

866

Verna I. Rabon.

)

vs.

) IN THE CIRCUIT COURT OF

Robert M. Rabon.

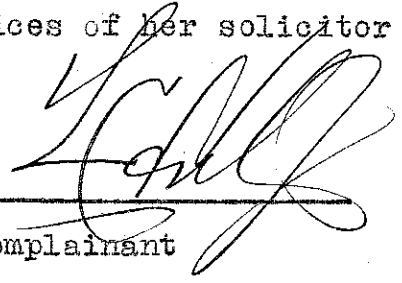
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BALDWIN COUNTY, ALABAMA.

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IN EQUITY.

Now comes the complainant in the above entitled cause and moves the court, to order a reference to be held in order to ascertain what would be a suitable and a proper amount to be allowed her as alimony pendente lite and permanent; also what would be a suitable amount to be allowed her for the services of her solicitor in this cause.

  
Solicitor for complainant

VERNA I. RABON,  
Complainant,

vs

ROBERT M. RABON,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Comes the Defendant in the above styled cause and for answer to Complainant's bill of complaint denies every material allegation therein contained, and demurring to Complainant's bill of complaint and as grounds of demurrers says that there is no equity in the bill.

  
ATTORNEYS FOR DEFENDANT.

**The State of Alabama,**  
Baldwin County

Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Robert M. Rabon

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Verne I. Rabon

against said Robert M. Rabon,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 19th day of December 1939

*T. W. Richerson*

Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Verna I. Baben.

vs.

Robert M. Baben.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Now comes the complainant in the above entitled cause and moves the court, to order a reference to be held in order to ascertain what would be a suitable and a proper amount to be allowed her as alimony pendente lite and permanent; also what would be a suitable amount to be allowed her for the services of her solicitor in this cause.

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Solicitor for complainant

Verna I. Rabon.                     )  
                  vs.                     )IN THE CIRCUIT COURT OF  
Robert M. Rabon.                    ) BALDWIN COUNTY. ALABAMA.  
  ) IN EQUITY.

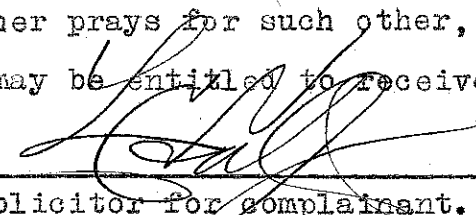
To the Honorable John D. Leigh Judge of the Circuit Court of  
Baldwin County, Alabama. In Equity.

The bill of complaint of Verna I. Rabon -versus- Robert M.  
Rabon, respectfully represents and shows unto your Honor as follows:

That oratrix and the defendant were lawfully married at Iron City  
Georgia, on or about to-wit, twenty-four years ago next prior to the  
time of the filing of this bill; that oratrix and the defendant are  
both over the age of twenty-one years; that oratrix is now and has  
been for more than one year next prior to the time of the filing of  
this bill a bona fide resident of Baldwin County, Alabama; that said  
defendant also resides in Baldwin County, Alabama; that the defendant  
in this cause on many occasions after his marriage to oratrix has  
cruelly cursed and abused her, and threatened to assault and beat her;  
that from the conduct of said defendant towards oratrix on all of said  
occasions, oratrix had grounds to reasonably apprehend, and did and  
now does reasonably apprehend from the conduct of said defendant to-  
wards her on all of said occasions as stated, that he would and now  
will inflict actual violence upon her person attended with danger to  
her life or health; that on other occasions since her marriage to the  
defendant in this cause, the said defendant has cruelly and violently  
assaulted and beat oratrix about her person with his fist; that each of  
the assaults committed and inflicted upon the person of oratrix by said  
defendant as stated were each attended with danger to her life or health  
that said defendant since his marriage to oratrix has committed divers  
acts of adultery with a woman in Baldwin County, Alabama, named Pearl  
Joiner; that there was born of the marriage of the parties to this cause  
among other children one Robert M. Rabon, Jr. now ten years of age; that  
said defendant is not a proper nor a suitable person to have the care,  
custody and control of said minor child; because of his ungovernable  
temper, and further because of the fact that he is practically addicted

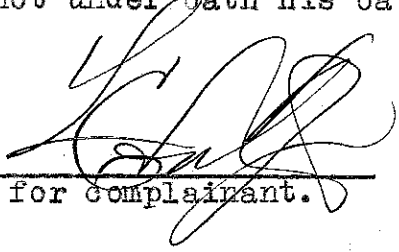
to habitual drunkenness, that complainant is a proper and a suitable person to have the care, custody and control of said minor child, and desires very much so to do, that oratrix has had the care custody and control of said minor child until a few days ago, when said defendant came and forcibly took possession of said minor child and he now has the possession of said child; that said child is ten years of age and needs the care, and protection of oratrix in this cause. That said defendant is an able bodied man, and is engaged in the turpentine business in this county, and also in the wholesale grocery business at Pensacola, Florida, operating there in connection with the firm by the name of Lurton and Company; that said defendants interest in said business is worth upwards of ten thousand dollars; that oratrix is not advised as to the value of said defendants turpentine business in Baldwin County, Alabama; but on information and belief she states the fact to be that the same is very valuable; and that this defendant derives from his property upwards of three hundred dollars per month; that oratrix has no money, property, or income, and that she is now entirely dependent upon her own personal efforts for her maintenance and support.

Wherefore oratrix prays that your Honor will take jurisdiction of the cause made by this bill; that said defendant be made party defendant to the same; and that said defendant by appropriate process to be issued and served on him be required to answer said bill; that it may please your Honor upon the hearing of said cause to decree that the bonds of matrimony now existing between oratrix and said defendant be dissolved; and that oratrix be permitted to marry again, and that your Honor will order a reference to be held in order to ascertain what would be a proper and suitable amount to be allowed her as alimony pendente lite and permanent; also what would be a suitable and proper amount to be allowed her for the services of her solicitor in this cause; and that your Honor will decree to her the care, custody and control of said minor child aforesaid, free from any interference whatsoever upon the part of said defendant, and oratrix further prays for such other, further and different relief as in justice she may be entitled to receive.

  
Solicitor for complainant.

FOOT NOTE:

The defendant is required to answer all of the allegations of the foregoing bill of complaint but not under oath his oath thereto being hereby expressly waived.

  
\_\_\_\_\_  
Solicitor for complainant.

Original Bill

Verna I Rabon  
vs

Robert M Rabon

Filed Dec 19<sup>th</sup>/429

T W Richardson  
Register

Foster K Hayles Jr  
Atty for Complainant



Original

SERVE ON \_\_\_\_\_  
Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

Verna I. Rabon

Vs.

Robert M. Rabon

Foster K. Hayles,

Solicitor for Complainant

Recorded in Vol \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this 8<sup>th</sup> ~~10<sup>th</sup>~~ 1929  
day of Dec

C. J. Irwin

Sheriff

Executed this 20<sup>th</sup> day of  
December 1929

by leaving a copy of the within Summons with

Robert M. Rabon

Defendant

C. J. Irwin

Sheriff

By \_\_\_\_\_  
Deputy Sheriff

Filed Dec 19<sup>th</sup> / 1929  
T. W. McIlwain  
Register