

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes the complainant, FRANCES SURY, and humbly complaining against the respondent, FRANK SURY, respectfully represents and shows unto your Honor as follows:

FIRST:

That both your complainant and the respondent are bona fide residents of Baldwin County, Alabama, and have been for more than three years next preceding the filing of this bill of complaint; that both are over twenty-one years of age.

SECOND:

That the complainant and the respondent were married in Austria in 1910; that they have lived together as husband and wife since that time.

THIRD:

That on, to-wit, June 11, 1933, and at various times prior thereto, the respondent cursed and abused the complainant, and on various occasions has done actual violence to her person by striking her, which was attended with danger to her life or health; that from his conduct she has reason to believe that such acts of violence will continue if she attempts to live with him; that his conduct, as alleged, has rendered it impossible for her to longer live with him as husband and wife.

WHEREFORE, the premises considered, complainant prays that your Honor will, by proper process, make the said Frank Sury party respondent to this bill of complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your complainant further prays that upon a final hearing of this cause your Honor will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony exist-

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ing between her and the respondent, Frank Sury.

Your complainant prays for such other, further or different relief as in equity and good conscience she may be entitled to receive. And complainant will ever pray.

Beebe & Stoll

Solicitors for Complainant.

FOOT NOTE:

Respondent is required to answer each and every allegation of the foregoing bill of complaint, Paragraphs FIRST to THIRD inclusive, but not under oath; oath being hereby expressly waived.

Beebe & Stoll

Solicitors for Complainant.

[Handwritten signature]
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JUN 13 1933

BY

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JUN 13 1933

Filed June 13/1933

W. H. Beebe

Stoll

Copy

FRANCES GURY,
Complainant,

vs.

FRANK GURY,
Respondent.

IN THE CIRCUIT COURT OF
BRIDGEMAN COUNTY, ALABAMA
IN EQUITY.

BILL OF COMPLAINT.

Filed June 23, 1933.

D. W. Richardson

Register

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NOTE:

Bill of Complaint

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Original

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BALDWIN COUNTY, ALABAMA.
IN EQUITY.

BILL OF COMPLAINT.

Filed

June 23, 1933

T. W. Richardson

Clerk.