

CORINNE WATERS,
Complainant,
VS.
BOWMAN WATERS,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN CHANCERY.

TO HONORABLE P. W. HARR, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN CHANCERY.

Comes your Complainant, CORINNE WATERS, and humbly complaining against the Respondent, BOWMAN WATERS, respectfully represents and shews unto your Honor and this Honorable Court as follows:

FIRST:

That both the Complainant and Respondent are bona fide residents of Baldwin County, Alabama, over twenty-one years of age.

SECOND:

That the Complainant and Respondent were married at Summedale, in Baldwin County, Alabama, on to-wit, August 25th, 1923, and lived together, in Baldwin County, Alabama, as husband and wife, until on to-wit, September 15th, 1936.

THIRD:

That on to-wit, September 15th, 1936, the Respondent cursed, abused and threatened the Complainant, and on several occasions, including on to-wit, September 15th, 1936, committed actual violence to the person of the Complainant, which necessarily endangered her life and health.

FOURTH:

That the Complainant and Respondent have four minor children: ^{Oscar Waters} B. B. Waters, Freddie Waters and Maxreen Waters, who are now and have been all their lives with your Complainant; that the Respondent drinks heavily and has a violent temper and is not a suitable person to have the custody, care and control of the said minor children.

-2-

FIFTH:

That the Respondent is an able-bodied man and capable of earning his livelihood for himself, the Complainant, and the minor children; that the Complainant has no means of income with which to support herself or the said minor children, *or to employ Counsel*

WHEREFORE, the premises considered, the Complainant prays that your Honor will, by proper process, make the said BOWMAN WATERS 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; that your Honor will order a reference to determine a reasonable alimony pendente lite to be paid by the Respondent to the Complainant and also a reasonable attorney's fee to be paid by the said Respondent to the Complainant.

Complainant 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 existing between her and the Respondent, BOWMAN WATERS; that your Honor will enter a further order and decree awarding to the Complainant the custody, care and control of the said minor children: B. B. Waters, Freddie Waters, Oscar Waters and Maureen Waters; that your Honor will enter a further order and decree awarding such reasonable permanent alimony to be paid by the Respondent to the Complainant as to your Honor seems just and proper; that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Becher & Beecher
Solicitors for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs FIRST to FIFTH, inclusive, but not under oath, oath being hereby expressly waived.

Becher & Beecher
Solicitors for Complainant.

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 BOWMAN WATERS,

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

CORINNE WATERS

against said BOWMAN WATERS

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, Robert S. Duck, Register of said Circuit Court, this 28th day of September 1936

R. S. Duck

Register

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

FIFTH:

That the Respondent is an able-bodied man and capable of earning his livelihood for himself, the Complainant and the minor children; that the Complainant has no means of income with which to support herself or the said minor children, *or by employment Councils.*

WHEREFORE, the premises considered, the Complainant prays that your Honor will, by proper process, make the said BOWMAN WATERS 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; that your Honor will order a reference to determine a reasonable alimony pendente lite to be paid by the Respondent to the Complainant and also a reasonable attorney's fee to be paid by the said Respondent to the Complainant.

Complainant 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 existing between her and the Respondent, BOWMAN WATERS; that your Honor will enter a further order and decree awarding to the Complainant the custody, care and control of the said minor children: B. B. Waters, Freddie Waters, Oscar Waters and Maureen Waters; that your Honor will enter a further order and decree awarding such reasonable permanent alimony to be paid by the Respondent to the Complainant as to your Honor seems just and proper; that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Bebe Heller Bebe
Solicitors for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs FIRST to FIFTH, inclusive, but not under oath, oath being hereby expressly waived.

Bebe Heller Bebe
Solicitors for Complainant.

CORINNE WATERS,
Complainant,
vs.
BOWMAN WATERS,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN CHANCERY.

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

Comes your Complainant, CORINNE WATERS, and humbly com-
plaining against the Respondent, BOWMAN WATERS, respectfully repre-
sents and shows unto your Honor and this Honorable Court as follows:

FIRST:

That both the Complainant and Respondent are bona fide
residents of Baldwin County, Alabama, over twenty-one years of
age.

SECOND:

That the Complainant and Respondent were married at
Summerdale, in Baldwin County, Alabama, on to-wit, August 25th,
1923, and lived together, in Baldwin County, Alabama, as husband
and wife, until on to-wit, September 15th, 1936.

THIRD:

That on to-wit, September 15th, 1936, the Respondent
cursed, abused and threatened the Complainant, and on several oc-
casions, including on to-wit, September 15th, 1936, committed
actual violence to the person of the Complainant, which necessarily
endangered her life and health.

FOURTH:

That the Complainant and Respondent have four minor
children: B. B. Waters, Freddie Waters^{Oscar Waters} and Maureen Waters, who
are now and have been all their lives with your Complainant; that
the Respondent drinks heavily and has a violent temper and is not
a suitable person to have the custody, care and control of the
said minor children.

Virginia

RECORDED
Quick
6-504

Serve on Bowman Waters

Circuit Court of Baldwin County
IN EQUITY

No. 260

SUMMONS

Gorlme Waters,

Complainant,

vs.

Bowman Waters,

Respondent.

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this 25

day of Sept, 1934

W. H. Baldwin
SHERIFF

Executed this 5th day of

October 1934

by leaving a copy of the within Summons with

Bowman Waters

Defendant

M. H. Wilkins
Sheriff

By *Louis R. Evans*
Deputy Sheriff

REEBER, HALL & REEBER
Solicitor for Complainant

Recorded in Vol. _____ Page _____

