

1737

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA: EQUITY SIDE

TO

BEVERLY NICHOLAS

You are hereby notified to appear and plead, answer or demur within thirty days of the receipt hereof to the Bill of Complaint filed in this Court at Bay Minette, Alabama, against you as Defendant by Vera Nicholas as Complainant.

WITNESS my hand this the 7th day of October, 1946.

*R. S. Duck*

Register

Register, Circuit Court

*Arcey J. Duck*  
D.A.

TO THE

HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA: IN EQUITY:

Comes VERA NICHOLAS, and by this her Bill of Complaint, presented against BEVERLY NICHOLAS, respectfully shows:

FIRST: That Complainant and Defendant are both over the age of twenty-one years; that both are now and have been for more than five years bona fide residents of Baldwin County, Alabama.

SECOND: That Complainant and Defendant were married in Baldwin County on January 14, 1939, but have not lived together since September 19, 1946.

THIRD: That in late years Defendant has treated Complainant with great cruelty. He has beaten her repeatedly and on two occasions drew a gun on her. On one occasion, the exact date of which she does not recall but it is within the year 1945, he struck her severely on the side with the barrel of a twenty-two caliber rifle. On another occasion, he fired a shotgun at her through her window. In February, 1946, she left him because of his cruel treatment, but came back to him after he had been badly hurt in an automobile wreck on promise of his reform, which he has not kept, and she has again left him for fear of her life.

FOURTH: Complainant further shows that she and the said BEVERLY NICHOLAS jointly own a home provided by her labor as well as his, together with the furniture in it; also, considerable chickens and livestock.

THE PREMISES CONSIDERED, Complainant prays that BEVERLY NICHOLAS be made party defendant to this cause, and by proper process required to answer this Bill within the time prescribed by Law.

Complainant further prays that a suitable allowance be made to her out of the estate of the Defendant to cover her counsel fees in this cause and that a division be made of the property owned by the parties jointly in which her rights will be protected, and that to this end, an order of reference be made to ascertain the proper allowance to be made her for such purpose.

Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from said BEVERLY NICHOLAS, granting her the right to marry again should she so desire, and to have such other, further or different relief as to equity may seem meet.

*R. S. Early & R. S. Early*

Solicitors for Complainant.

1787

VERA NICHOLAS,  
Complainant

vs

BEVERLY NICHOLAS,  
Defendant

-----  
BILL OF COMPLAINT  
-----

*Filed*

*10-7-46*

*R-S. Nichols*

*Rm*

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA: EQUITY SIDE

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*R. S. Luck*

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*Richard D. Richardly*

Solicitors for Complainant.

1787

VERA NICHOLAS,  
Complainant

vs

BEVERLY NICHOLAS,  
Defendant

-----  
BILL OF COMPLAINT  
-----

*Filed*

*7-10-46*

*R.S. Lusk*  
*By Alice J. Lusk*

ELLIOTT G. RICKARBY

LAW OFFICES  
RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

October 8, 1946

Mr. Robert S. Duck  
Register  
Bay Minette, Alabama

Dear Sir:

NICHOLAS vs NICHOLAS: So far we have  
heard nothing from the Defendant in this  
case, so please put summons in the hands  
of the Sheriff for service.

Very truly yours,

for

*Elliott G. Rickarby*  
RICKARBY & RICKARBY

EGR:esm  
2610

*None*  
*10-10-46*

**RECEIPT**

No. 817

**THE STATE OF ALABAMA, BALDWIN COUNTY**

Equity Division, Circuit Court.

Case No. 1737

Date 10-7, 1946

RECEIVED OF Rickard (Nicholas vs. Nicholas)  
the sum of 1000

Trial Tax	\$
	\$
	\$
	\$
	\$
	\$
	\$
	\$

R. S. Which  
As Register, Baldwin County, Ala

TOTAL: \$ 1000

By \_\_\_\_\_



ELLIOTT G. RICKARBY

LAW OFFICES

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

October 5, 1946

Mr. Robert S. Duck  
Register  
Bay Minette, Alabama

Dear Sir:

NICHOLAS vs NICHOLAS: With this fine  
Bill of Complaint in duplicate, which please  
file and check for \$10.00 costs.

We have written Nicholas asking him to  
see us and if he comes in and signs Answer,  
no service will be required, so do not put  
copy in the hands of the sheriff until you  
hear from us further.

Very truly yours,

*Elliott G. Rickarby*

for

RICKARBY & RICKARBY

EGR:csn  
2610