

(1773)

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

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

CIRCUIT COURT BALDWIN COUNTY

\_\_\_\_\_ TERM, 194\_\_\_\_\_

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon

Ray m. Ray

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

Ray m. Ray

\_\_\_\_\_, Defendant \_\_\_\_\_

by \_\_\_\_\_

Anna Mae Ray

\_\_\_\_\_, Plaintiff \_\_\_\_\_

Witness my hand this

26<sup>th</sup>

day of

November 1946

Archie J. Duck

Clerk.

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

**THE STATE OF ALABAMA**  
BALDWIN COUNTY  
**CIRCUIT COURT**

*Anna Mae Ray*

Plaintiffs

vs.

*Ray M. Ray*

Defendants

**SUMMONS AND COMPLAINT**

Filed 11-26 1946

*Alice J. Newick* Clerk

Plaintiff's Attorney

Defendant's Attorney

Moore Printing Co., Bay Minette, Ala.

Defendant lives at

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this

by leaving a copy with

*Ray M. Ray*

194

Sheriff

Deputy Sheriff

ANNA MAE RAY

Complainant

-vs-

ROY M. RAY

Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Comes your Complainant, Anna Mae Ray, and exhibits this, her Bill of Complaint for divorce against Roy M. Ray, and shows unto your Honor and this Court as follows:-

FIRST:

That your Complainant is over the age of twenty-one years and is a bona fide resident of the State of Alabama, her present address being Foley, Alabama; that the Respondent is a resident of Canoe, Escambia County, Alabama, and that he is over the age of twenty-one years.

SECOND:

That your Complainant and the Respondent were married on, heretofore, to-wit, April 9, 1946, and lived together as man and wife until November 16, 1946, when because of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that after marriage Respondent became addicted to habitual drunkenness and on many occasions has used threatening language to your Complainant so that she was apprehensive of her safety and that on several occasions Respondent struck your Complainant and kicked her so that she was sorely bruised.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Roy M. Ray be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Complainant be granted

a divorce from the said Respondent.

Should your Complainant be maistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled, and as in duty bound she will ever pray.

  
Solicitor for Complainant