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GEORGIA BELLE TOLER,	IN THE CIRCUIT COURT OF
Complainant,	BALDWIN COUNTY, ALABAMA,
LLOYD GEORGE TOLER,	IN EQUITY.
Respondent.	

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

Comes your Complainant and humbly complaining against the Respondent, Lloyd George Toler, respectfully represents and shows unto your Honor and this Honorable Court as follows:

# FIRST:

That she is a bona fide resident of Baldwin County, Alabama, and has been for more than three years next preceding the filing of this Bill of Complaint; that the Respondent is a resident of the State of North Carolina, but is presently residing in Washington, D. C., his post office address being: C/o Postal Telegraph Company, Operating Room, 1420, New York Avenue; that both the Complainant and the Respondent are over twenty-one years of age.

# SECOND:

That the Complainant and the Respondent were married on July 20th, 1936, at Frederick, Maryland, and lived together as husband and wife until December 25th, 1936.

### THIRD:

That the Respondent is anhabitual user of strong drinks, and when under the influence of it, has a violent and uncontrollable temper; that he, on December 25th, and various times prior thereto, cursed, abused and threatened the Complainant, and that from his conduct, the Complainant has every reasonable apprehension to believe and does believe that he will carry out his threats and do actual violence to her, which will be attended with danger to her life and health should she continue to live with him.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said Lloyd George Toler party respondent to this bill of complaint, requiring him to plead, answer or demur to the same with-

in the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that your Honor will, upon a final hearing of this cause, give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony heretofore existing between her and the Respondent; that your Honor will enter a further order and decree restoring to her her maiden name: Georgia Belle Armstrong; 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.

Solicitors for the Complainant.

FOOT NOTE:

The Respondent, Lloyd George Toler, is required to enswer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs First to Third, inclusive, but not under oath, oath being hereby expressly waived.

Solicitors for the Complainant.

# The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

WE COMMAND YOU, That you s	ummon	Lloyd	George.	Toler.		
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CIRCUIT COURT, BALDWIN COUNTY, ALA.
IN EQUITY BILL OF COSTS

PLAINTIFF DEFENDANT

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Serve on \_\_\_\_\_\_\_Circuit Court of Baldwin County
IN EQUITY

THE STATE OF ALABAMA,

BALDWIN COUNTY

No.

No.

IN EQUITY

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Received in office this -

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Recorded in Vol.

Solicitor for Complainant

LLOYD GEORGE TOLER,

Respondent.

IN THE CIRCUIT COURT OF

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BALDWIN COUNTY, ALABAMA,



