

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

RALPH COOPER

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

AUDREY COOPER,

against said RALPH COOPER.

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 10th day of May 193 8

R. S. Duck Register

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

AUDREY COOPER,
Complainant,

vs.

RALPH COOPER,
Respondent.

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

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

Comes your Complainant, Audrey Cooper, and humbly
complaining against the Respondent, Ralph Cooper, respectfully
represents and shows unto your Honor and this Honorable Court as
follows:

1: That Your Complainant and the Respondent are both
over twenty-one years of age and residents of Hobartdale, in
Baldwin County, Alabama.

2: That your Complainant and the Respondent were married
at Pensacola, in the State of Florida, on, to-wit: October 12th,
1930, and lived together as husband and wife until February 23rd,
1938.

3: That the Respondent is a man of ungovernable temper; that
on to-wit, February 23rd, 1938, and various times prior thereto, the
Respondent has cursed, abused and threatened the Complainant; that
on February 23rd, 1938, he did actual violence to her person by
striking and choking her; that his conduct in such that Complainant
has every reasonable apprehension to believe, and does actually
believe, that if she continues to live with him, he will continue
to carry out his threats and do further violence to her person which
will necessarily endanger her life and health.

4: That there was born to said marriage one child, a boy
six years old, Keith Cooper; that said minor child has all of his
life been with your Complainant, his mother, and that the Complainant
is ready, able and capable of caring for said minor child; that the
Respondent is not at this time properly situated to care for the
child.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said Ralph Cooper, 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.

Complainant further prays that upon a final hearing of this cause, this Honorable Court will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent, Ralph Cooper; that your Honor will enter a further order and decree awarding to her the care, custody and control of said minor child Keith Cooper; for at least half time alternating for six month periods, that your Honor will allow a reasonable attorney fee for her Solicitor and tax the cost of this proceeding to the Respondent; that your Honor will give and grant unto her such other, further, different and/or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Audrey Cooper
Complainant.

Chris A. Brown
Solicitor for Complainant.

FOOT NOTE:

The Respondent, RALPH COOPER, is required to answer each and every allegation contained in the foregoing Bill of Complaint in paragraph 1 to 4, inclusive, but not under oath, oath being hereby expressly waived.

Audrey Cooper
Complainant.

Chris A. Brown
Solicitor for Complainant.

(005)

AUDREY COOPER,
Complainant,

vs.

RALPH COOPER,
Respondent.

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

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

Comes your Complainant, Audrey Cooper, and humbly
complaining against the Respondent, Ralph Cooper, respectfully
represents and shows unto your Honor and this Honorable Court as
follows:

1: That Your Complainant and the Respondent are both
over twenty-one years of age and residents of Robertsdale, in
Baldwin County, Alabama.

2: That your Complainant and the Respondent were married
at Pensacola, in the State of Florida, on, to-wit: October 12th,
1930, and lived together as husband and wife until February 23rd,
1938.

3: That the Respondent is a man of ungovernable temper; that
on to-wit, February 23rd, 1938, and various times prior thereto, the
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Complainant.

Chris M. Brown
Solicitor for Complainant.

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Audrey Cooper
Complainant.

Chris M. Brown
Solicitor for Complainant.

Admitted RECORDED *Book*
7-452

AUDREY COOPER,
Complainant,
vs.

RALPH COOPER,
Respondent.

BILL OF COMPLAINT.

Filed this 10 DAY May 1935
R. S. [Signature]
Clerk-Registrar

RECORDED *Deed*
(original) 7-257

Serve on _____

Circuit Court of Baldwin County
IN EQUITY

No. _____

SUMMONS

AUDREY COOPER,

Complainant

vs.

RAITH COOPER,
Respondent.

Orville M. Brown
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this 16th day of

May 1938

by leaving a copy of the within Summons with

Ralph Cooper
Defendant

W. V. Vickins
Sheriff

By *John R Davis*
Deputy Sheriff