

Mary E. King, Complainant )  
vs )  
Julius King, Respondent.)

In The Circuit Court of Baldwin  
County, Alabama.  
In Equity.

Comes, Julius King, the person named as defendant and respondent in the said cause now pending in the said Circuit Court of Baldwin - County, Alabama in Equity and for his answer to the Bill of Complaint herein say<sup>s</sup>: he denies each and every allegation therein made and he - demands strict proof of the same; he ,also, waived service of<sup>d</sup> subpoena by the sheriff on said Bill<sup>(also,)</sup> copy of interrogatories filed and notice of the filing of the same and waives notice of the time and place of the taking of testimony of witnesses on oral examination before the clerk of the Circuit Court of Baldwin County or before a commissioner that may be appointed for such purpose; also, the right to cross question said witnesses and he consents that the cause may be submitted in vacation to the Judge of said Circuit Court for a final decree on the note of testimony to be made by the Register or Clerk of said court.

Witnesses :

S. C. King  
Julius King

Julius King

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 JULIUS KING,

Atmore, Ala., -Escambia 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

MARY E. KING,

against said JULIUS KING,

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, M. A. Stone, Register of said Circuit Court, this 20th day of May 1938

R. S. Dush Register

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

Mary E. King, Complainant }  
vs }  
Julius King, Respondent }

In The Circuit Court of Baldwin  
County, Alabama.  
In Equity.

To the Honorable Francis W. Hare, Judge of the Twenty First Judicial  
Circuit of Alabama, which includes Baldwin County:-

Humbly complaining, your Oratrix, Mary E King, respectfully represents  
unto your Honor, as follows:-

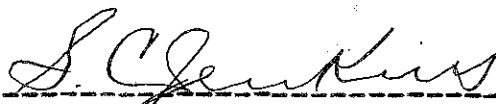
1. That your Oratrix, the said Mary E King, and Julius King, the said  
respondent, were legally married, on to wit, August 27th, 1932, at  
Brewton, Alabama, in Escambia county of said state; and they lived -  
together as husband and wife until February 18th, 1938, when the  
said Julius King, the respondent aforesaid, deserted your Oratrix and  
said he would live with her no more; said desertion or separation took  
place at Bay Minette, Alabama in Baldwin County, while your Oratrix and  
the said Julius King were living at Bay Minette, Alabama, where they  
had been living for the past three years, prior to said date of  
February 18th, 1938. That since said time of February 18th, 1938, they  
have not lived together as husband and wife. Your Oratrix continued to  
reside at Bay Minette and supported herself and her two children by  
working in restaurants and other jobs from time to time she managed to  
get. The respondent went to live at Atmore, Alabama, where he now  
resides. Your Oratrix is a resident of Bay Minette, Alabama, where  
she has resided as a bona fide citizen of Alabama for more than three  
years prior and preceeding the filing of her Bill of Complaint in  
this cause. Both your Oratrix and the respondent are bona fide citizens  
of the state of Alabama.

2. That at the time of the separation, between your Oratrix and the  
respondent, the respondent attempted to beat up your Oratrix, he slapp  
ed and struck your Oratrix and knocked her down; the eighteen year  
old son of your Oratrix, Dewey Bryan, came to the rescue of your  
Oratrix and prevented him from beating your Oratrix up; prior to this  
time respondent had treated your Oratrix cruelly and so cruelly that  
that your Oratrix had a reasonable apprehension that he would commit  
actual violence on her person such as would endanger her health and  
life and on March 18th, to wit, 1938 he did attack her with actual  
violence sufficient to endanger her health and life.

3. Your Oratrix further shows to your Honor that both your Oratrix and the respondent are over the age of twenty one years .

Wherefore, the premises considered, Your Oratrix, the said Mary E King, prays that a subpoena be issued and directed to the said Julius King, the respondent aforesaid, in this cause; that he brought into this Honorable Court; that he may be made a party defendant to the Bill of Complaint filed in this cause and that upon a final hearing of the evidence in this cause offered and at a final hearing therein, your Honor will order, adjudge, and decree that the bonds of matrimony heretofore existing between your Oratrix and the respondent, the said Julius King, be forever dissolved and that your Honor will, also, order, adjudge and decree that your Oratrix be permitted to marry again and that she be granted such other and further relief as may in equity and good conscience may seem meet and proper to your Honor.

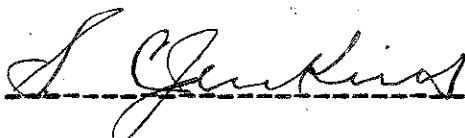
And your Oratrix will ever pray etc.



Solicitor for the Complainant.

Foot Note:

The respondent is required to answer each and every paragraph of the foregoing Bill of Complaint from item 1 to item 3 inclusive, but not under oath, his answer under oath is hereby expressly waived.



Solicitor for the Complainant.

RECORDED *Duch*  
7-483

TO :

**ANSWER & WAIVER**

[Faint, mostly illegible text, likely the body of the legal document]

Filed this 26 day May 1935

*R. S. Duch*  
Clerk-Register

100

100

(original)

*Atwood*

SERVE ON \_\_\_\_\_

Circuit Court of Baldwin County  
IN EQUITY

No. 421

SUMMONS

MARY E. KING,  
Complainant,

vs.

JULIUS KING,  
Respondent.

S. C. JENKINS,  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

RECORDED *Blue*

7-4-54

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this \_\_\_\_\_

day of \_\_\_\_\_ 193 \_\_\_\_\_

SHERIFF

Executed this 8 day of June 1938

by leaving a copy of the within Summons with

*Julius King*

Defendant

*J. A. Roby*

Sheriff

By *W. W. W. King*

Deputy Sheriff

RECORDED  
9-4534  
Duel

MARY E. KING,  
Complainant,

vs.

JULIUS KING,  
Respondent.

BILL OF COMPLAINT.

Filed this 20 day May 1935

R. S. Duell

Clerk-Register