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ETHEL J. STYRON,
Complainant,
VS.
HENRY T. STYRON,
Respondent.

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

This cause coming on to be heard is submitted upon the Prayer of the Complainant that a reference be held to determine the facts hereinafter set out, and it appearing to the Court that the Complainant is entitled to the relief prayed for:

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the cause be and is hereby referred to the Register of the Circuit Court of Baldwin County, Alabama, to ascertain the following facts:

1. The amount to be paid by the Respondent to the Complainant, as alimony, pendente lite.
2. The amount to be paid by the Respondent to the Complainant as attorney's fee in prosecuting said cause.

The Register is ordered to forthwith hold said reference to ascertain the said facts, and that immediately upon the ascertainment thereof to report his findings to the Court for its consideration.

Done at Maunserille, Alabama, this 9th day of July, 1938.

F. W. Hare
Judge.

ORDER OF REFERENCE.

HENRY I. STYRON,
 Complainant,
 vs.
 HENRY I. STYRON,
 Respondent.

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

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Done at _____, Alabama, this _____ day of July, 1938.

 Judge.

ETHEL J. STYRON,
Complainant,
VS.
HENRY T. STYRON,
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, ETHEL J. STYRON, and humbly complaining against the Respondent, HENRY T. STYRON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant and Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age; that they were married at Pensacola, Florida, on July 25th, 1936, and lived together as husband and wife, in Baldwin County, Alabama, until on to-wit, Monday, May 30th, 1938.
2. That on to-wit, May 30th, 1938, and various times prior thereto, the Respondent threatened and abused the Complainant and did actual violence to her person by striking her and also drove her away from their home; that the conduct of the Respondent was such that the Complainant had every reasonable apprehension to believe and she does believe that if she continues to live with him, he will carry out his threats and do further violence to her person, which would necessarily endanger her life and health;
3. That the Complainant and Respondent have five minor children, by a former marriage, to-wit: Ralph, fourteen, Ray, eleven, Lovetta, seven, Gerald, four, and Sam, three; that the said children have been with the Complainant all their lives until May 30th, when the Respondent drove her away from home; that the children are now with the Respondent; that the Complainant is capable, ready and willing to care for the said children; that the Respondent has no place nor any person to take care of the said children and on account of having to work out is not in position to properly care for them; that he is not a suitable, fit or proper person to have the care, custody or control of the said minor children.
4. That the Respondent is an able-bodied man, capable of making at

least Twenty-five Hundred (\$2500.00) Dollars per year; that he has real and personal property of the value of at least Six Thousand (\$6,000.00) Dollars; that the Complainant has neither property nor money, nor any means of making a livelihood for herself other than by manual labor; that she has no funds to employ counsel to prosecute this suit.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said HENRY T. STYRON 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; that your Honor will order a reference to determine a reasonable attorney's fee to be paid by the Respondent for the use of the Complainant and also as alimony, pendente lite.

Complainant further prays that upon a final hearing of this cause, your Honor will give and grant unto her a decree of divorce forever barring the bonds of matrimony existing between her and the Respondent, HENRY T. STYRON; that your Honor will award to her the care, custody and control of the said minor children: Ralph, Ray, Lovetta, Gerald and Sam; and that your Honor will enter a further decree awarding to the Complainant such reasonable alimony, permanent, to be paid by the Respondent to and for the use of the Complainant; Complainant prays for 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.

Ethel J. Styron
Complainant.

Beckwith & Bebe
Solicitors for Complainant.

FOOT NOTE:

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

Ethel J. Styron
Complainant.

Beckwith & Bebe
Solicitors for Complainant.

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Complainant,

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Complainant,

Solicitors for Complainant.

FOOT NOTE:

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

Complainant.

Solicitors for Complainant.