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 )  
 ANNIE TISDALE BRUNSON, )  
 Complainant. )  
 )  
 -vs- )  
 )  
 JAMES AMOS BRUNSON, )  
 Defendant. )  
 )  
 -----X

IN THE CIRCUIT COURT OF BALDWIN COUNTY  
 STATE OF ALABAMA-IN EQUITY.

Cause Number \_\_\_\_\_

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,  
 EQUITY SIDE, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, SITTING IN EQUITY

Comes your Complainant, Annie Tisdale Brunson, and files this, her original Bill of Complaint for divorce and respectfully alleges and shows against the Defendant, James Amos Brunson, the following;

FIRST.

That both the complainant and defendant are over the age of twenty-one years, are bona fide residents of Baldwin County, Alabama, where they have resided for more than two years next immediately preceeding the filing of this bill of complaint.

SECOND.

That complainant and defendant were married on, to-wit; November 25th, 1909 at Brunson Chapel, Crenshaw County, Alabama and lived together as man and wife until about, to-wit; December 3d, 1919, when the complainant was compelled by the actions of the defendant to seeksafety elsewhere than at their home.

THIRD.

That the defendant has been guilty of extreme cruelty towards the complainant, both in words and actions; that these acts have been repeated from time to time. That on, to-witl December 3d, 1919, the defendant choked the complainant, slammed her against the wal, cursed and abused her. That the defendant has committed actual violence on her person, attended with danger to life and health and that fromthe conduct of the defendant there is a reasonable apprehension on the part of the complainant of a continuation of such violence.

FOURTH.

That there was born to them by said marriage one female child named Helen Francis Brunson, now eight years of age, who resides with yaur

complainant in this county. That the defendant is not a proper or fit person to have the care, custody and control of said child because of his violent temper and immoral habits but that your complainant, the mother of said child is a fit and proper person to have such custody and control of said child.

FIFTH.

That the defendant is a man of considerable means, is able bodied, healthy and able to earn and does earn a good living; that complainant is a woman of not very good health, is weak in body and unable to earn her own living and that of her child or educate properly the said child. That Defendant is well able to support your complainant and the said child and to educate said child, suitable to their condition in life.

PRAYER FOR PROCESS.


THE PREMISES CONSIDERED, complainant prays that such order and decree be made by this court as are necessary to make the defendant, James Amos Brunson, a party respondent to this bill of complainant; also that your Honor <sup>adjudge</sup> and decree that a reference be held before the Register of this court to enquire into the earning capacity and estate of the defendant and to ascertain a suitable amount to be paid by the defendant to the complainant and said child for the support of complainant and said child and for the education of said child and for counsel and solicitor's fee for the complainant in the prosecution of this cause, suitable to their condition in life and the estate and earning capacity of the defendant.

PRAYER FOR RELIEF.

Complainant prays that upon a holding of the reference by the Register that your Honor will decree and suitable amount to the complainant as alimony "pendente lite" and solicitors fees during the pendency of this cause, suitable to the condition in life of the complainant and the estate and earning capacity of the defendant.

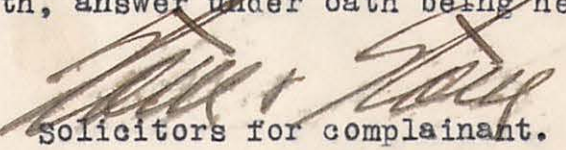
That upon a final hearing of this cause that your Honor will render, adjudge and decree a suitable amount to the complainant from the estate and earning capacity of the defendant as permanent alimony and for the support, maintenance and education of said child, Helen Francis

Brunson, suitable to their condition in life and the earning capacity and estate of the defendant and that your Honor will further render and decree that the bonds of matrimony heretofore existing between the complainant and the defendant be forever dissolved and that your complainant be again permitted to contract the marriage relation if she so desires and that your Honor will render and decree that the custody, care and control of the said child, Helen Francis Brunson be given to the complainant. And as in duty bound, she will ever pray, etc., etc.,

  
Solicitors for complainant.

FOOT NOTE:-

The defendant is required to answer each and every paragraph of the foregoing bill of complaint, from "FIRST" to "FIFTH", both inclusive, but not under oath, answer under oath being hereby expressly waived.

  
Solicitors for complainant.

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 James Amos Brunson

of Butler 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

Annie Tisdale Brunson

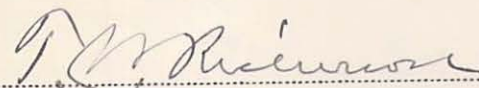
against said

James Amos Brunson,

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, T. W. Richerson, Register of said Circuit Court, this 17th, day of January,

1920, 191



Register.

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

*Original*

Copy on James Amos Brunson,

Serve on ..... at Butler Springs, Butler Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

Received in office this.....

day of ..... 191.....

No.....

Sheriff.

SUMMONS.

Executed this 12<sup>th</sup> day of

Feb 1910

by leaving a copy of the within Summons with

J. A. Brunson

Defendant

R. K. Murphy

Sheriff

By

Geo Murphy

Deputy Sheriff.

vs.

James Amos Brunson,

Stone and Stone.

Solicitor for Complainant.

Recorded in Vol..... Page.....

*Original*