

CAROL [REDACTED],
COMPLAINANT,
VS:
PAUL [REDACTED],
DEFENDANT.

IN THE LIMESTONE COUNTY COURT, IN EQUITY.

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes the Complainant, Carol [REDACTED], and exhibits this her Bill of Complaint against Paul [REDACTED] and respectfully represents unto the Court:

1. The Complainant and Respondent are each over the age of 21 years. The Complainant is a bona fide resident of Jefferson County, Alabama, and the Defendant is a non-resident of the State of Alabama, his Post Office address being 277 Park Avenue, New York.

2. The Complainant and the Defendant were lawfully married on July 16th, 1943, and lived together thereafter as husband and wife until, to-wit May 15, 1951, at which time they separated, and have not, since that date, lived together as man and wife, and are now living separate and apart. There are no children as a result of said marriage.

3. The Complainant alleges that on or about the 15th day of May, 1951, the Respondent voluntarily abandoned the bed and board of Complainant without just cause or fault on her part, and that they have never lived or resided together as man and wife since such voluntary separation and abandonment, which said abandonment has been continuous to this time, and which time is more than twelve months next preceding the filing of this Petition.

4. The parties have entered into an agreement as to the support of the Complainant by the Defendant. In the event a decree of divorce is rendered in this matter, Complainant prays that said agreement be ratified and made a part of said decree.