

STATE OF ILLINOIS)
 COUNTY OF PEORIA)

IN THE CIRCUIT COURT
 OF PEORIA COUNTY
 JANUARY TERM, A. D. 1946.

GERTRUDE PRYOR,)
 PLAINTIFF,)
 -VS-)
 LEROY PRYOR,)
 DEFENDANT.)

IN CHANCERY.
 GEN. NO. 30372
 ACTION FOR DIVORCE.

BILL OF COMPLAINT

Now Comes, Gertrude Pryor, Plaintiff, by Wm. D. Conway, her attorney, and complains of Leroy Pryor, the Defendant, and alleges:

(1) The Plaintiff, respectfully represents unto this Honorable Court, that she is a resident of the City of Peoria, County of Peoria and State of Illinois, and has been for a period of more than one year, last past, and prior to the filing of this, her Bill of Complaint.

(2) The Plaintiff further represents unto this Honorable Court, that on the 24th day of December, A. D. 1943, in the City of Peoria, County of Peoria and State of Illinois, she was lawfully married to the said Leroy Pryor, Defendant herein, and continued to live with the said Defendant as his wife ever since the said marriage until the 31st day of December, A. D. 1945, when she was compelled to leave the Defendant for fear of her own safety.

(3) That during the said period of time and while the Plaintiff and Defendant, lived and cohabited together as husband and wife, the Plaintiff, in all respects, observed and fulfilled all of her marriage vows and obligations and always conducted herself in a manner becoming an affectionate and virtuous wife in an effort to make their home comfortable and happy.

(4) That as a result of this marriage no issue was born but the Plaintiff and the Defendant are the parents of one child, namely, to-wit: Richard Thomas, aged five years, who was born out of wedlock and who was subsequently recognized by the Plaintiff and the Defendant as their own child.

(5) That the said Defendant, during the past year has been guilty of extreme and repeated cruelty, and has at different times abused her in the manner following:

That on the 21st day of December, A.D. 1945, the Plaintiff was attacked in her own home by the Defendant, who kicked her in the face and struck her severely bruising her.

That again on or about the 29th day of December, A. D. 1945, this Plaintiff was attacked by this Defendant, who struck her and beat her about the face and body until she was compelled to seek refuge with friends.

That on or about the 27th day of November, A. D. 1945, this Plaintiff was also attacked by this Defendant, who threw a chair at her, severely bruising her, and beat her about the face and body and threatened her compelling her to seek refuge with neighbors and friends.

(6) That there are no property rights involved in the matter between the parties hereto.

WHEREFORE, PLAINTIFF, Gertrude Fryor, prays judgment that the said marriage between the Plaintiff, Gertrude Fryor and the Defendant, Leroy Fryor, may be dissolved and declared null and void by the Decree of this Honorable Court according to the Statute in such case made and provided; that the Plaintiff shall have the care, custody and control of their said minor child, Richard Thomas; and that this Plaintiff may have such other and further relief in the premises as Equity may require.

[Signature]
 Attorney for Plaintiff
 215 1/2 South Fifth Street
 Springfield, Illinois.

X *[Signature]*
 Plaintiff.

*I hereby request a summons
 in the above entitled cause
 Atty for Gertrude Fryor*

COURT OF PROBATE
DIVISION OF ILLINOIS

The Defendant, Leroy Pryor, further states that Plaintiff is not entitled to any of the relief prayed for in the Prayer for Relief contained in the Complaint for Divorce filed in this cause.

COUNTERCLAIM FOR DIVORCE

Comes now Leroy Pryor, Defendant above named, and counter-Plaintiff in this counterclaim, and complaining of the above named Plaintiff and Counter-defendant, alleges:

1. That the said Leroy Pryor is an actual resident of the City of Peoria, County of Peoria and State of Illinois, and has been an actual resident of the State of Illinois for more than one whole year last past prior to the filing of the original complaint and the Counterclaim for Divorce in this cause.

2. That on the 24th day of December, A. D. 1943, said Leroy Pryor and said Gertrude Pryor were lawfully joined in marriage at Peoria, Illinois; and that the said Gertrude Pryor lived and cohabited with the said Leroy Pryor as his wife until the latter part of December A. D. 1945, when said Gertrude Pryor, without any reason or provocation, left the said Leroy Pryor and the City of Peoria, Illinois.

3. That the said Gertrude Pryor in utter disregard of her marriage vows and obligations, on or about the 20th day of March, A. D. 1945, on or about the 15th day of April, A. D. 1945, and on or about the 28th day of December, A. D. 1945, committed adultery and had carnal knowledge with a male person, who, for the purposes of this Counterclaim for Divorce shall be known as John Dow; and that said Gertrude Pryor has at divers other times and places to your Counter-Plaintiff

THE DEFENDANT'S PLEA IN ANSWER TO THE PLAINT

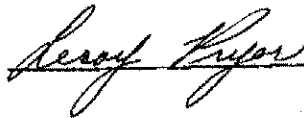
known since their marriage, committed adultery with divers other persons to your counter-plaintiff unknown.

4. That the minor child mentioned in paragraph number four of the original complaint filed in this cause was taken from the home of the said Leroy Pryor by Gertrude Pryor and removed from the City of Peoria; and that after many attempts to see said child and the said Gertrude Pryor at other places came to no avail, said Gertrude Pryor filed the original complaint for divorce in this cause, thus disclosing her whereabouts.

5. That the said Gertrude Pryor is an unfit person to have custody and control of the said minor child, Richard Thomas; and that she has in the past abandoned said child at various times in the City of Peoria, Illinois.

6. That the said Leroy Pryor has recently returned from service with the Army of the United States and is a fit and proper person to have custody and control of the said minor child, Richard Thomas.

7. WHEREFORE, your counter-plaintiff prays judgment that the said marriage between Plaintiff and Defendant may be dissolved and declared null and void by the Decree of this Honorable Court according to the statutes in such cases made and provided; that the said Defendant and Counter-plaintiff be awarded the care, custody and control of the said minor child, Richard Thomas; and that this Counter-plaintiff, Leroy Pryor, have such other and further relief in the premises as Equity and good conscience may require.



Leroy Pryor

STATE OF ILLINOIS)
 COUNTY OF PEORIA)

IN THE CIRCUIT COURT
 OF PEORIA COUNTY
 JANUARY TERM, A. D. 1946

GERTRUDE FRYOR,)
 PLAINTIFF,)
 -VS-)
 LEROY FRYOR,)
 DEFENDANT.)

IN CHANCERY
 GEN. NO.
 ACTION FOR DIVORCE

AFFIDAVIT OF NON-MILITARY SERVICE

Gertrude Fryor, being first duly sworn upon her oath deposes and states the she is a resident of the City of Peoria, County of Peoria and State of Illinois.

AFFIANT FURTHER STATES that she was married to one Leroy Fryor, on the 24th day of December, A. D. 1943, in the City of Peoria, County of Peoria and State of Illinois.

AFFIANT FURTHER STATES that since the 31st day of December, A.D. 1945, she has not lived with Leroy Fryor.

AFFIANT FURTHER STATES that the said Leroy Fryor is not now a member of the military service of the United States.

FURTHER AFFIANT SAYETH NOT.

Gertrude Fryor
 AFFIANT.

Subscribed and sworn to before me this 17 day of
 January, A. D. 1946.

John J. Conway
 Notary Public.

My Commission expires Oct 22, 1946

The Court further finds that the Plaintiff and Defendant were married in Peoria, Illinois, on the 26th day of March, A. D. 1915, in the City of Peoria, Illinois; and that the parties lived together as husband and wife until subject to the acts complained of in this cause for divorce.

STATE OF ILLINOIS)
)
 COUNTY OF PEORIA)

IN THE CIRCUIT COURT OF
 PEORIA COUNTY, ILLINOIS

GERTRUDE PRYOR,
 Plaintiff and
 Counter-defendant

vs.
 LEROY PRYOR,
 Defendant and
 Counter-Plaintiff

No. 30372
 In Chancery.
 DECREE FOR DIVORCE.

This cause coming on to be heard this 26th day of March, A. D. 1946, upon the complaint heretofore filed by the Plaintiff, the answer and counter-claim for divorce filed by the defendant; and the court having heard the sworn testimony of the witnesses in open court and having heard the arguments of counsel doth find that the matters and things set out in the counter-claim for divorce in this cause are true and that the equities in the said cause are with the defendant and counter-plaintiff; and the complaint heretofore filed is herewith dismissed for lack of equity; and the court further finds that it has jurisdiction of the parties hereto and of the matters hereof.

The Court further finds that the Plaintiff - Counter-Defendant and Defendant counter-plaintiff are actual residents of the County of Peoria and State of Illinois, and that they have been actual residents of the State of Illinois for more than one whole year last past prior to the filing of the complaint and counter-complaint for divorce in this cause.

The Court further finds that the Plaintiff and Defendant were lawfully joined in marriage December 24, A. D. 1943, in the City of Peoria, Illinois; and that the parties lived together as husband and wife until subsequent to the acts complained of in this cause for divorce and the said Counter-claim for divorce.

The Court further finds that during the time that said Counter-Plaintiff lived and cohabited with the said Counter-defendant as her husband, he always conducted himself toward her as a true, loving, affectionate and dutiful husband.

The Court further finds that the said Counter-defendant, Gertrude Pryor, not regarding her marriage

vows and obligations has committed adultery subsequently to her marriage with the said Counter-Plaintiff as charged in the counter-complaint filed in this cause.

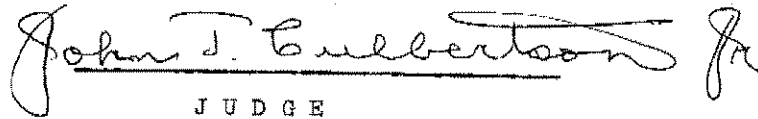
The Court further finds that the said Counter-defendant has at various times deserted and abandoned the minor child of said marriage, Richard Thomas Pryor; and that the said minor child is at the present time abandoned by the said counter-defendant in Springfield, Illinois, at the present time.

The Court further finds that of the said marriage between the parties to this cause, one child, Richard Thomas Pryor, age 5 years, was born.

The Court further finds that the said Counter-Plaintiff is a fit and proper person to have the custody and control of the said minor child, Richard Thomas Pryor; and that the said Counter-defendant is an unfit person to have the custody and control of the said minor child.

THE COURT ORDERED JUDGE SPER AND THE DISTRICT CLERK

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED
by the Court that the marriage between the Plaintiff -
Counter-defendant and Defendant - Counter-Plaintiff be
dissolved and the same is hereby dissolved accordingly.
The Court has awarded custody, control and education of the said minor
child, Richard Thomas Pryor, without any interference on the
part of the said Counter-defendant, Gertrude Pryor, until
further order of this Court.


J U D G E