

NOV 10 1947  
P. E. GRAHAM  
Clerk  
Deputy

FOLTZ & RENOLD  
ATTORNEYS AT LAW  
211 EAST MAIN STREET  
STOCKTON, CALIFORNIA

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA,  
IN AND FOR THE COUNTY OF SAN JOAQUIN.

11 LOUISE TELLER, )  
12 Plaintiff )  
13 vs. )  
14 GEORGE W. TELLER, )  
15 Defendant. )

No. 42523  
Dist. # 3  
COMPLAINT

17 Plaintiff complains of Defendant and for cause of  
18 action allegues:

I.

20 That Plaintiff herein is now and has been for a  
21 period of three months immediately preceding the commencement of  
22 this action, a resident of San Joaquin County, California, and  
23 has been a resident of the State of California for a period of one  
24 year immediately preceding the commencement of this action.

II.

26 That Plaintiff and Defendant herein intermarried in  
27 the City of Reno, Washoe County, State of Nevada, on the 7th day  
28 of August, 1940, and ever since said time have been, and now are,  
29 husband and wife; that Plaintiff and Defendant herein separated on  
30 the 2nd., day of August, 1947, and that a period of six  
31 years, eleven months and twenty-five days has elapsed  
32 between the date of marriage of said parties, and the date of

1 their separation.

2 III.

3 That there are two children the issue of said  
4 marriage, namely, Arline Rose Teller, a daughter, born April 26,  
5 1941, and Rachel Eleanor Teller, a daughter, born September 5,  
6 in Plaintiff's custody, clothing for which is withheld by Defendant  
7 1342; that Plaintiff herein is a fit and proper person to be awarded  
8 the care, custody and control of said minor children.

9 IV.

10 That Plaintiff and Defendant own certain community  
11 property, both real and personal under the control of Defendant,  
12 which Plaintiff is informed and believes, and upon such information  
13 and belief alleges to be of the value of more than \$10,000.00.

14 V.

15 That Defendant has no money or property with which to  
16 support herself and the minor children of the parties hereto, herein-  
17 before mentioned, either permanently or during the pendency of this  
18 action, and has no means with which to pay her attorneys' fees or  
19 the costs of defending this action, and has employed Folts & Rendon,  
20 Attorneys at Law, Stockton, California, to represent her in this  
21 action; that Defendant is steadily employed and is now earning and  
22 receiving wages approximating \$400.00 a month and that he will con-  
23 tinue to receive and earn like wages, and that said Defendant is  
24 earning sufficient wages and is able to pay this Plaintiff a reason-  
25 able sum for the support and maintenance of herself and the minor  
26 children of the parties hereto, and to pay a reasonable sum as and  
27 for her attorneys' fees and costs herein; that the sum of \$100.00  
28 per month is a reasonable sum to be allowed Plaintiff for alimony  
29 herein, and that the sum of \$150.00 is a reasonable sum to be allowed  
30 Plaintiff for the support and maintenance of the minor children of  
31 the parties hereto, during the pendency of this action and permanently;  
32 that the sum of \$500.00 is a reasonable sum as and for attorneys'  
fees of Plaintiff herein; and that the sum of \$50.00 is a reasonable

1 sum and for Plaintiff's costs of suit herein.

2 VI.

3 That subsequent to the aforesaid date of the marriage  
4 of Plaintiff and Defendant, and prior to their separation, Defendant  
5 contrary to his marital vows, has been guilty of extreme cruelty  
6 toward Plaintiff and has wrongfully inflicted upon Plaintiff grievous  
7 mental suffering and grievous bodily injury, without any fault or  
8 provocation on the part of said Plaintiff.

9 VII.

10 That the defendant has threatened to sell, assign, or  
11 encumber the community property of the parties hereto for the purpose  
12 of defeating Plaintiff's right and claim thereto as his wife, and  
13 for the purpose of embarrassing, hindering, and delaying the  
14 satisfaction of any orders made herein for the support and maintenance  
15 of Plaintiff, and for suit money to enable Plaintiff to prosecute this  
16 action, and to prevent the enforcement of any decree or judgment  
17 made herein affecting Plaintiff's rights or claims in and to said  
18 property, and providing for the support and maintenance of said  
19 Plaintiff; that Plaintiff is informed and believes, and upon such  
20 information and belief alleges the fact to be, that the defendant  
21 intends to and will, unless restrained by an order of the court from  
22 so doing, carry out his said threats and promises as hereinabove  
23 alleged; that by reason of the fact of said Defendant's threats  
24 hereinabove mentioned, this Plaintiff requests this Honorable Court  
25 for an order or orders restraining, temporarily enjoining and per-  
26 manently enjoining said Defendant, the Stockton Savings and Loan  
27 Bank, Stockton, California, and Defendant's agents, employees and  
28 depositories, from selling, transferring, assigning, encumbering, or  
29 in any manner disposing of said property, until this court has  
30 rendered its judgment distributing or disposing of same.

31 WHEREFORE, Plaintiff prays judgment as follows:

- 32 1. That the bonds of matrimony heretofore and now exist-

- 1 ing between Plaintiff and Defendant herein be dissolved;
- 2 2. That Plaintiff be awarded the care, custody and control
- 3 of the minor children of the parties hereto, namely, Arlene Rose
- 4 Teller and Rachel Eleanor Teller; together with their clothing.
- 5 3. That Defendant be ordered to pay to Plaintiff, as and
- 6 for alimony the sum of \$100.00 per month during the pendency of this
- 7 action, and permanently; the further sum of \$150.00 per month as and
- 8 for maintenance and support of the minor children of the parties
- 9 hereto; the further sum of \$500.00 for her attorneys' fees herein;
- 10 and the further sum of \$50.00 for Plaintiff's costs of suit herein;
- 11 or such other and further sum or sums as to the above-entitled Court
- 12 may seem meet, just and proper in the premises.
- 13 4. That Plaintiff be awarded the community property of
- 14 the parties hereto.
- 15 5. That the Defendant be ordered to appear before this
- 16 Court at a time to be fixed by the Court and show cause, if any
- 17 he has, why he should not be ordered to make said payments.
- 18 6. That an order pendente lite be granted to Plaintiff
- 19 enjoining and restraining the Defendant, the Stockton Savings & Loan
- 20 Bank, Stockton, California, and Defendant's agents and employees from
- 21 selling, transferring, conveying, assigning, or otherwise disposing
- 22 of and from mortgaging, hypothecating, or otherwise encumbering any or
- 23 all of the community property belonging to the parties hereto,
- 24 particularly the community property of the parties hereto in the
- 25 possession of the Stockton Savings and Loan Bank, Stockton,
- 26 California.
- 27 7. And for such other and further relief as to this
- 28 Court may seem meet and equitable in the premises.

29 *Galt & Randall*  
30 Attorneys for Plaintiff.  
31  
32

12/20/47  
#1

Stockton Calif.

Dec 20<sup>th</sup> 1947

Mr R. E. Graham

Dear Sir:

Case #42525

Dept 3 set for hearing Dec 23<sup>rd</sup> 1947

I wish to inform you Mr George W. Teller  
and my self have gone back to-gether  
and at the present time are living  
to-gether as married please remove my  
case from the court on that date.

Yours truly

Louise Teller.

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*Md. Jan 12, 1948*  
**R. E. GRAHAM**  
CLERK  
*F. P. Stanley*  
DEPUTY

**FOLTZ & RENDON**  
ATTORNEYS AT LAW  
811 EAST MAIN STREET  
STOCKTON, CALIFORNIA

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LOUISE TELLER, )  
Plaintiff )  
vs. )  
GEORGE W. TELLER, )  
Defendant. )

No. 42525

To the Clerk:

Heretofore I mailed you a letter authorizing you  
to dismiss the above action. I have changed my mind and  
I do not want that action dismissed and hereby instruct you  
accordingly.

Dated this 12th day of January, 1948.

*Mrs. Louise Teller*  
Plaintiff.