

IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA

ANGIE LEIGH HORTON

\*

PLAINTIFF

\*

VS.

\*

CASE NO. DR-97-526-RSM

JONATHON WADE HORTON

\*

DEFENDANT

\*

AFFIDAVIT OF THE PLAINTIFF IN SUPPORT OF  
VERIFIED PETITION FOR EX PARTE RELIEF

Before me, the undersigned Notary Public in and for said State and County, personally appeared Angie Leigh Horton, who, after being duly sworn, deposes and says the following:

1. My name is Angie Leigh Horton.
2. I am the named Plaintiff in the above styled cause.
3. I am 23 years of age and am a resident of Etowah County, Alabama and have been for at least the last six months preceding the filing of the Verified Bill of Complaint for Divorce in this cause.
4. I am married to Jonathon Wade Horton and have been since December 28, 1992.
5. Jonathon Wade Horton and I separated Sunday, July 6, 1997.
6. I make this affidavit in support of the Verified Petition for Ex Parte Relief contained in the Verified Bill of Complaint for Divorce filed in this cause.
7. I have been subjected to physical and mental abuse at the hands of the defendant, my husband during the course of our marriage.
8. The last incidence of physical abuse was a violent physical assault by my husband on me Sunday night, July 6, 1997 wherein he hit me, pulled my hair.
9. I filed a police report regarding that incident.
10. My husband has further made threats against me life on several occasions and on some occasions has threatened to kidnap or take our children from me.

