

3377

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, } Circuit Court, Baldwin County
Baldwin County. } No.
..... TERM, 19....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~xEdna~~ Clyde James Eldiwitw

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

Clyde James Eldiwitw, Defendant.....

by Edna Eldiwitw

....., Plaintiff.....

Witness my hand this 13th day of October 19 54

Edna Eldiwitw, Clerk

EDNA P. ELDIWITW,
 Complainant,
 -vs-
 CLYDE JAMES ELDIWITW,
 Respondent.

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA
 IN EQUITY

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TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Comes your Complainant, Edna P. Eldiwitw, and files this her Bill of Complaint for Divorce against Clyde James Eldiwitw, and respectfully represents and shows unto your Honor:

1. That your Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such a resident citizen for more than one year next preceeding the filing of this Bill of Complaint; that Clyde James Eldiwitw is over the age of twenty-one years and is a resident of the State of Alabama.

2. The Complainant and Respondent were lawfully married on, to-wit:- May 17, 1953.

3. Your Complainant further avers and alleges that the Respondent has been guilty of adultery with divers parties or persons whose names are unknown to your Complainant, and that there has been no condonation by Complainant.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Clyde James Eldiwitw be made a party defendant to this cause by the usual process of this Honorable Court, by Personal Service, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided. The Complainant further prays that upon final hearing of this cause that she be granted a divorce from the Respondent, and that should your Complainant be mistaken in the relief prayed for that she be granted such other, further, different and general relief to which she may be

entitled and as in duty bound she will ever pray.



Solicitor for Complainant

FILED

OCT 13, 1915

ALICE I. BUCK, Register

Respondent works for:

Jackson & Hope Towing Company
Water Street (near shipyard)
Mobile, Alabama