

The State Of Alabama } Circuit Court of Baldwin County, In Equity.
Baldwin County }

To Any Sheriff of the State of Alabama—GREETINGS:

WE COMMAND YOU, That you summon
CHARLES GALLAWAY,

of Steamship USS Leonard Wood, New York City, New York
of County, to be and appear before the Judge of the Circuit
Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of
Summons; and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited

by
ARRIE BELL SIMS GALLAWAY

against said CHARLES GALLAWAY

and further to do and perform what said Judge shall order and direct in that behalf. And this the
said Defendant shall in no wise omit, under penalty, etc. And we further command that you return
this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. Duck, Register of said Circuit Court, this 23rd
July, 194 1.

R. S. Duck, Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

ARRIE BELL SIMS GALLAWAY : IN THE CIRCUIT COURT OF
 COMPLAINANT :
 VS : BALDWIN COUNTY, ALABAMA
 : IN EQUITY
 CHARLES GALLAWAY :
 RESPONDENT :

TO THE HONORABLE JUDGE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY & ALABAMA, SITTING IN EQUITY.

Your Complainant, Arrie Bell Sims Gallaway, shows unto your Honor that she is a resident of the County of Baldwin, State of Alabama, over the age of twenty-one and that Charles Gallaway, Respondent, is a resident of New York c/o Steamship USS Leonard Wood and is over the age of twenty-one; and shows unto the Court as follows:

ONE: That Complainant is a bona fide resident of Alabama for one year next preceding the filing of this Bill of Complaint.

TWO: That Complainant and Respondent intermarried on or about July 10, 1939 at St Bernard Parish Louisiana and ever since have been and now are husband and wife.

THREE: That there have been no children born of this marriage.

FOUR: That on diverse dates since November 11, 1939 Respondent has become addicted to the habitual use of intoxicants and that he was not so addicted at the time of and prior to Complainants marriage to Respondent.

FIVE: That on or about November 11, 1939 Respondent abandoned Complainant and since that date has left her bed and board and has not provided for her care or support.

PRAYER FOR PROCESS

Complainant prays your Honor to grant to her appropriate and legal process and that the same be directed to the said Charles Gallaway, Respondent, commanding him to personally appear before the Honorable Court within the time required by law, and to then and there answer fully and completely the several paragraphs of this Bill of Complaint and that he be required to abide and obey all orders and decrees of this Court, which to your Honor may seem meet and proper.

Arrie Bell Sims Gallaway

County, Alabama, to be held for said County at the place of holding the same, then and there to answer this Bill of Complaint.

Witness my hand this-_____day of _____, 1941.

Register in Chancery.

Complainant requires a strict answer to Paragraphs One to Five of this Bill of Complaint but hereby expressedly waives the requirement that the answer be under oath.

Respondent is a Seaman aboard USS Leonard Wood now docked in New York City NY.

STATE OF ALABAMA,)
BALDWIN COUNTY,)

I, R. S. Duck, Register of the Circuit Court of Said State and County, hereby certify that ~~-----~~I have, on the date written below, mailed a copy of the Bill of Complaint filed in this cause, together with copy of summons, to the Respondent, Charles Gallaway, C/o Steamship USS Leonard Wood, New York City, N. Y., by registered mail, with postage prepaid, with return receipt requested, and marked for delivery only to the person to whom addressed.

Witness my hand this the 23rd day of July, 1941.

R. S. Duck
R. S. DUCK, Register.

740

Bill of Complaint

RECORDED

*Filed July 23, 1941
R. S. Duck, Register*

ARRIE BELL SIMS GALLAWAY	:	IN THE CIRCUIT COURT OF
COMPLAINANT	:	
	:	BALDWIN COUNTY, ALABAMA
VS	:	
	:	IN EQUITY
	:	
CHARLES GALLAWAY	:	
RESPONDENT	:	

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Arrie Bell Sims Gallaway

PRAYER FOR RELIEF

Complainant prays that the bonds of matrimony between herself and Respondent be forever dissolved.

Complainant prays that she be allowed to resume her maiden name, Arrie Bell Sims.

Complainant and Respondent ask to be permitted to remarry within 60 days after the final judgment in this cause is rendered.

Complainant prays for such other, further and general relief as she may be entitled to in equity and good conscience.

Arrie Bell Sims Gallaway
Complainant
Richard D. Denevee
Solicitor for Complainant.

STATE OF ALABAMA
COUNTY OF BALDWIN

Arrie Bell Sims Gallaway, being duly sworn, says that she is the Complainant whose name is subscribed to the foregoing Bill of Complaint; that she has heard the above Bill of Complaint read, and knows the contents thereof; that the said Bill of Complaint is true of her own knowledge except as to matters and things therein stated to be upon information and belief, and as to those matters and things she believes them to be true.

Arrie Bell Sims Gallaway
Complainant and Affiant.

Subscribed and sworn to before me this 21st day of July 1941.
Richard D. Denevee
Notary Public, Baldwin Co. Ala.

STATE OF ALABAMA :
COUNTY OF BALDWIN : To any sheriff in the State of Alabama.

You are commanded to summon, Charles Gallaway by Registered Mail, Return Receipt Requested, care of USS Leonard Wood New York City N. Y. to appear within 30 days from the service of this Writ in the Circuit Court of Baldwin

RECEIPT FOR REGISTERED ARTICLE No. _____

15 fee paid. 1.00 class postage paid. 7-23, 1941 (Date)

Declared value 5.00 Surcharges paid, \$ _____

From R. H. Dyer (Sender) Civ. Clerk (Post office and State)

Addressed to Charles Hallam (Post office and State)

Hampton Road Woodbury, N.J. (Address)

(Street and number) (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee 3 { in person _____ or order _____ } Special delivery fee _____

Delivery restricted to addressee { Fee paid 1.00 } Postmaster, per [Signature]

••• 16-12668

