

STATE OF ALABAMA,

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - CHERTING:

WE COMMAND YOU, That you summon JESSIE LEE IVORY to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 CLAUD IVORY, JR. against JESSIE LEE IVORY, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent 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 11th day of December, 1941.

R. S. Duck
Register.

CLAUD IVORY, JR., Complainant,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

JESSIE LEE IVORY, Respondent.

IN EQUITY.

TO HONORABLE F. W. HANE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
IN EQUITY:

Now comes the Complainant, CLAUD IVORY, JR. and humbly complaining against the Respondent, JESSIE LEE IVORY, respectfully represents and shows unto your Honor and this Honorable Court, as follows:

1.

That your Complainant is over twenty-one years of age and a resident of Baldwin County, Alabama; That the Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama;

2.

That your Complainant and the Respondent were married at Bay Minette, Alabama, December 17, 1932, and lived together as husband and wife until, to-wit, December 1, 1939;

3.

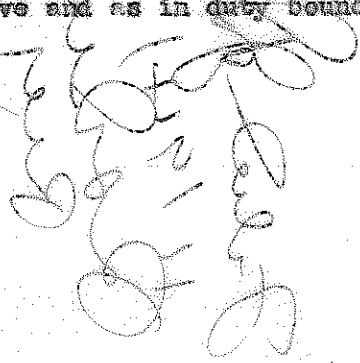
That on, to-wit, December 1, 1932, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.

Wherefore the premises considered, the Complainant prays that your Honor will by proper process make the said Respondent, JESSIE LEE IVORY, party respondent to this Bill of Complaint, requiring her to plead, answer, or demur to the same

within the time and under the penalties prescribed by law and the practice of this Honorable Court.

The Complainant further prays that upon a final hearing of this cause your Honor will make and enter a decree awarding to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that your Honor will give and grant unto him such other, further, different, and general relief as he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.

W. A. WHEATON, JR.
SOLICITOR AT LAW



SUMMONS & COMPLAINT

Beebe & Hain
Solicitor for Complainant.

WESSIE LEE L. HAYES
AS
CIVIL LIVERY & COMMISSION

W 200

140

CLAUD IVORY, JR. Complainant
VS.
JESSIE LEE IVORY, Respondent

NOTICE FOR CONTEST

SUMMONS & COMPLAINT

Handwritten signatures and dates: "H. R. Ivory" and "1914"

BEEBE & HALL, LAWYERS
Bay Minette, Ala.

...with love and...
...and good confidence...
...and your honor will give and grant into your honor's...
...the bonds of matrimony existing between him and the...
...your honor will make and enter a decree...
...the complaint...
...of this honorable Court...
...the laws and under the penalties prescribed by law and the practice

STATE OF ALABAMA,

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon JESSIE LEE IVORY to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 CLAUD IVORY, JR. against JESSIE LEE IVORY, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent 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 17th day of Dec, 1941.

R S Duck
Register.

CLAUD IVORY, JR., Complainant,
VS.
JESSIE LEE IVORY, Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

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

Now comes the Complainant, CLAUD IVORY, JR. and humbly complaining against the Respondent, JESSIE LEE IVORY, respectfully represents and shows unto your Honor and this Honorable Court, as follows:

1.

That your Complainant is over twenty-one years of age and a resident of Baldwin County, Alabama; That the Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama;

2.

That your Complainant and the Respondent were married at Bay Minette, Alabama, December 17, 1932, and lived together as husband and wife until, to-wit, December 1, 1939;

3.

That on, to-wit, December 1, 1932, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.

Wherefore the premises considered, the Complainant prays that your Honor will by proper process make the said Respondent, JESSIE LEE IVORY, party respondent to this Bill of Complaint, requiring her to plead, answer, or demur to the same

within the time and under the penalties prescribed by law and the practice of this Honorable Court.

The Complainant further prays that upon a final hearing of this cause your Honor will make and enter a decree awarding to him an absolute decree of ~~divorce~~ forever barring the bonds of matrimony existing between him and the Respondent; that your Honor will give and grant unto him such other, further, different, and general relief as he may be in equity and good conscience entitled to receive and as in duty bound he will ever pray.

Beebe V. Hase
Solicitor for Complainant.

780
(not here)

CLAUD IVORY, JR., Complainant,
VS.
JESSIE LEE IVORY, Respondent.

RECORDED

SUMMONS & COMPLAINT

Filed RR in the Town of

Filed Dec 11, 1941
Robert R. Ee

EEEBE & HALL, LAWYERS
Bay Minette, Ala.

Received in Sheriff's Office
this 12 day of Dec., 1941
W. R. STUART, Sheriff

Presented _____ 19____
by serving copy of within Summons and
Complaint on _____

After diligent search and
inquiry the Respondent
has been found not found in
my county. This is by reason of
W. R. Stuart, Sheriff
Bay Minette, Ala. 12/11/41