

2454

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon, Rachael James, to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by Willie James, as Complainant and against Rachael James, as Respondent.

WITNESS my hand this 15th day of March, 1950.

David L. Ketch
Register

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WILLIE JAMES
COMPLAINANT
VS.
RACHAEL JAMES
RESPONDENT

XX

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO HON. THOMAS J. MASHEBURN JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

Your Complainant, Willie James, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant and the Respondent are both over twenty-one years of age, a bona fide residents of Baldwin County, Alabama.
2. That your Complainant and the Respondent married at Stockton, Alabama, in 1914, and lived together as husband and wife until on July 4, 1947.
3. That on July 4, 1947, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered your Complainant prays that your Honor will by proper process make the said Rachael James 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.

Complainant further prays that upon a final hearing hereof your Honor will make and enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that she be granted such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

W. L. Jones
Solicitor for the Complainant

#2454

Received in Sheriff's Office
this 15 day of Apr, 1950
TAYLOR WILKINS, Sheriff

Executed April 15 1950
by serving copy of within Summons and
Complaint on

Rachael James

Taylor Wilkins Sheriff
H F Hall Deputy Sheriff

RECORDED

WILLIE JAMES

COMPLAINANT

VS.

RACHAEL JAMES

vaughn

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

SUMMONS AND COMPLAINT

FILED

APR 15 1950

ALICE J. DUCK, Register

ANSWER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof, separately and severally says:

1. That she admits the allegations of the first paragraph of the Bill of Complaint.

2. That she admits the allegations of the second paragraph of the Bill of Complaint.

3. That she denies the allegations of the third paragraph of the Bill of Complaint and demands strict proof thereof.

4. For further answer to said Bill of Complaint the Respondent says that on or about July 4, 1947, the Complainant threatened her and drove her out of their home in which they had lived for many years; that she has been working for a number of years and had accumulated about \$500.00 which amount the Complainant caused her to invest in their home; that your Respondent is sick and unable to earn a living and she has been living with her oldest son who has been helping to support her; that she has no money or property with which to support herself or to employ a Solicitor to defend this suit.

WHEREFORE, Respondent prays that this Court will order and decree that the Complainant shall pay her a reasonable amount as alimony and that the Court will order that the home in which she was living at the time the Complainant drove her out be turned over to her and that your Honor will ascertain and fix a reasonable Solicitors fee to be paid her Solicitors, Chason & Stone, for their services in this matter.

Chason & Stone

By; John Chason
Solicitors for Respondent.

WILLIE JAMES,

Complainant,

vs.

RACHEL JAMES,

Respondent.

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

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof, separately and severally says:

1. That she admits the allegations of the first paragraph of the Bill of Complaint.
2. That she admits the allegations of the second paragraph of the Bill of Complaint.
3. That she denies the allegations of the third paragraph of the Bill of Complaint and demands strict proof thereof.
4. For further answer to said Bill of Complaint the Respondent says that on or about July 4, 1947, the Complainant threatened her and drove her out of their home in which they had lived for many years; that she has been working for a number of years and had accumulated about \$500.00 which amount the Complainant caused her to invest in their home; that your Respondent is sick and unable to earn a living and she has been living with her oldest son who has been helping to support her; that she has no money or property with which to support herself or to employ a Solicitor to defend this suit.

WHEREFORE, Respondent prays that this Court will order and decree that the Complainant shall pay her a reasonable amount as alimony and that the Court will order that the home in which she was living at the time the Complainant drove her out be turned over to her and that your Honor will ascertain and fix a reasonable Solicitors fee to be paid her Solicitors, Chason & Stone, for their services in this matter.

Chason & Stone

By: 
Solicitors for Respondent.