

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY } No. 983.

CIRCUIT COURT BALDWIN COUNTY

Aug. TERM, 1943

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Ruby B Johnson.

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

Ruby B Johnson.

, Defendant

by Ira Lee Johnson.

Plaintiff

Witness my hand this 12th day of August, 1943

Clerk.

IRA LEE JOHNSON
COMPLAINANT

VS

RUBY B. JOHNSON
RESPONDENT

) In the Circuit Court

) Baldwin County

) Alabama

) IN EQUITY

To THE HONORABLE F. W. HARE, Judge of said Court, sitting in
Equity:

Comes Your Complainant, Ira Lee Johnson, and respectfully
exhibits this, His Bill of Complaint, against Ruby B. Johnson,
and shows unto Your Honor as follows:

First: Complainant, who is past the age of 21 years and who
has been a resident for more than one year past and continues
to be such resident at this date, intermarried with the Resp-
ondent, on January 2nd 1929 at Alama, Georgia, and the parties
hereto lived together thereafter as husband and wife until
June 15th 1941 at which time, Respondent voluntarily abandoned
Complainant and has continued said abandonment ever since to
the date hereof with total neglect of the marital covenant on
her part to be performed.

Second: The Respondent is, at present, a resident of the State
of Pennsylvania, living at Number 1131 Chestnut Street, Lebanon,
Pennsylvania.

Prayer for Process:

The premise considered, Complainant prays that Respondent, Ruby
B. Johnson, be made defendant to this Bill and, by appropriate
process, be required to answer the same within the time prescri-
bed by law, that as a part of said service, that the Register
of Your Honorable Court be required to mail a copy hereof,
together with a summons, to Respondent, by registered mail, at
the said place of her residence in said State of Pennsylvania
and that said Respondent be required to obey such orders or
decrees as may be entered against her.

Prayer for Relief:

Complainant prays that, upon the hearing of this cause, a decree
be rendered forever divorcing Complainant from Respondent; grant-
ing Complainant the right to remarry should he so desire and
granting Complainant such other, further and different relief
as may appear proper in the premises.

E. Tramer
Solicitor for Complainant.

Respondent resides at
1131 Chestnut Street
Lebanon, Pennsylvania,
for service by registered
mail.

IRA LEE JOHNSON,
Complainant,
VS.
RUBY B. JOHNSON,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 983.

DEMURRER

Now comes the Respondent and for Demurrer to the Bill of
Complaint says:

1. There is no equity in the bill.

J. B. Blackburn
Solicitor for Respondent.

[Faint, mirrored text from the reverse side of the page, including names like 'J. B. Blackburn' and 'Solicitor for Respondent']

DEMURRER

IRA LEE JOHNSON,

Complainant,

VS.

RUBY E. JOHNSON,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 983.

*Accepted
September 20 1945
R. E. Johnson
Respondent*

COLLECTOR FOR RESPONDENT.

I. There is no equity in the bill.

Complaint says:

Now comes the respondent and for answer to the bill of

demurrer

respondent:

IRA E. JOHNSON

VS.

Complaint:

IRA LEE JOHNSON

IN EQUITY. NUMBER 983.

BALDWIN COUNTY, ALABAMA.

IN THE CIRCUIT COURT OF

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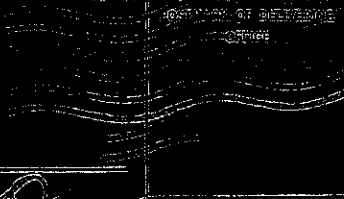
Complaint

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Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USES TO VOID PAYMENT OF POSTAGE AND



Return to *R. S. Dusk*
(NAME OF SENDER)

Street and Number,
or Post Office Box

REGISTERED ARTICLE

326 Post Office

INSURED PARCEL

NO. *167-2401* State

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1

By name or name of addressee

2

Signature of addressee or agent thereof (agent thereof's name on this card)

Date of delivery 194...

Handwritten scribbles and markings on the right side of the card, including what appears to be a large 'A' and some illegible cursive text.

RECIEPT FOR REGISTERED ARTICLE No. 376

15 fee paid. 1 class postage paid. 8-12, 1943 (Date)

Declared value, \$ 200.00 Surchage paid, \$ _____

From P. S. Smith (Sender)

B. M. (Street and number) (Post office and State)

Addressed to Ruby B. Johnson (Addressee)

1131 Chestnut St. Lebanon, Pa (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 10 Postmaster, per W. O. J.



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No. 983.

CIRCUIT COURT BALDWIN COUNTY

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Ruby B Johnson., Defendant

by Ira Leel Johnson.