

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2626

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Thomas Gulley

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 _____

Thomas Gulley

, Defendant

by Eunice Kent Gulley

, Plaintiff

Witness my hand this 6th day of April 1951

Denise J. Smith, Clerk

No. 2626

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

EUNICE KENT GULLEY

vs.

Plaintiffs

THOMAS GULLEY

Defendants

SUMMONS and COMPLAINT

Filed 4-7, 1951

W. J. H. H. H., Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19

, Sheriff

I have executed this summons

this, 19

by leaving a copy with

Sheriff

Deputy Sheriff

EUNICE KENT GULLEY,) (
Complainant,) (IN THE CIRCUIT COURT OF
-vs-) (BALDWIN COUNTY, ALABAMA
THOMAS GULLEY,) (
Respondent.) (IN EQUITY

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, Sitting in Equity;

Your complainant, Eunice Kent Gulley, respectfully represents
and shows unto your Honor:

1. That complainant is over the age of twenty-one years and
is a resident of said State and County, and has been a bona fide
resident of said State for more than one year next preceding the
filing of this Bill of Complaint; that Thomas Gulley is over the
age of twenty-one years and his present address is not known to
the complainant, his last known address being Mobile, Alabama.

2. That your complainant and respondent were lawfully mar-
ried on or about, to-wit, June, 1944.

3. Complainant further avers that said respondent volun-
tarily abandoned the bed and board of complainant for more than
one year next preceding the filing of this Bill of Complaint, since
which time complainant and respondent have not lived together nor
in any way recognized each other as husband and wife. Complainant
further avers that there were no children born of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: your complainant prays that Thomas
Gulley be made a party defendant to this cause by the usual process
of this Honorable Court 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; that
upon a final hearing of this cause that your complainant be granted
a divorce from said respondent. Should your complainant be mistaken
in the relief prayed for, that there be granted to her such other,
different and general relief to which she may be entitled, and as
in duty bound, she will ever pray.

c. g. c.

Respondent's last known
address: Malbis Bakery,
Mobile, Alabama.


Solicitor for Complainant