

JESSIE RAY BOLLING

Complainant,

- VS -

MARGIE MOORE BOLLING

Respondent

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your Complainant Jessie Ray Bolling, respectfully represents and shows unto your Honor:-

1. That your Complainant is over the age of twenty-one years and is a resident of said County and State; that Margie Moore Bolling is over the age of twenty-one years and is presently residing at 3404 Belmont Street, Pensacola, Florida.

2. That your Complainant the the Respondent were married in November of 1949, and lived together as man and wife until September, 1951. There are no children of this marriage.

3. Complainant further avers that the said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceeding 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 has been a resident of Alabama during this entire period.

PRAYER FOR PROCESS AND RELIEF

The PREMISES CONSIDERED, your Complainant prays that Margie Moore Bolling be made a party defendant of this cause by the usual process of this Honorable Court, by service by Registered Mail, requiring her 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 that he be granted a divorce from the said Respondent. Should your Complainant be mistaken in the relief prayed for that he be granted such other, further and different and general relief to which he may entitled and as in duty bound he will ever pray.

Solicitor for Complainant

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