

EDNA JONES,

Complainant,

-vs-

GEORGE W. JONES,

Respondent.

3344
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:

Comes your Complainant, Edna Jones, and files this her Bill of Complaint for divorce against George W. Jones, and respectfully represents and shows unto your Honor:-

1. That the Complainant is over the age of twenty-one years and a resident citizen of the State of Alabama, Baldwin County, having been such a resident citizen for more than one year. That George W. Jones is over the age of twenty-one years and is not a resident of Alabama, and that his last known address was c/o Eddie Lee Jones, General Delivery, Sneads, Florida.

2. That the Complainant and Respondent were married on, to-wit February 27, 1950.

3. That the Complainant further avers that the Respondent has, since her marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

PRAYER FOR PROCESS AND RELIEF

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

CECIL G. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

November 18, 1953

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint in the Divorce
action of Jones -vs- Jones.

Yours very truly,


C. G. Chason

CGC:fm

encls. 2

The State of Alabama
Baldwin County

Circuit Court

Equity

To

George W. Jones

You are hereby commanded to appear and plead, answer or demur, within thirty days from the service hereof, as provided by an Act of the Legislature of Alabama, approved September 25th, 1919, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, against you, Defendant....., by *Edna Jones* Complainant.....

A copy of which Bill of Complaint is hereto attached.

Witness by hand, this *20th* day of *Nov* 195 *3-*

Reice J. Muck
Register

ALICE J. DUCK, Circuit Clerk

Baldwin County

BAY MINETTE, ALA.

Not here

Registered
For Delivery Only
to Person to whom addressed.

Return receipt requested.

3144

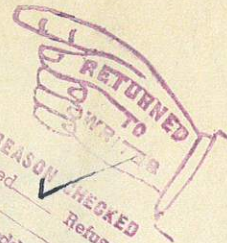


REASON CHECKED
Unclaimed ☒ Refused
Unknown ☐
For better address ☐
Moved, Left no address ☐
No such office in state ☐

~~Mr. George W. Jones~~
~~Eddie Lee Jones~~
~~Gen. Del.~~
~~Sneads, Florida~~

Deliver to Addressee Only

RETURN RECEIPT REQUESTED



REASON CHECKED
Unclaimed ☒ Refused
Unknown ☐
For better address ☐
Moved, Left no address ☐
No such office in state ☐





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EDNA JONES,

-vs-

GEORGE W. JONES,

Complainant,

Respondent.

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

GEORGE W. JONES

-vs-

EDNA JONES

BILL OF COMPLAINT

FILE

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

Comes your Complainant, Edna Jones, and files this her Bill
of Complaint for divorce against George W. Jones, and respectfully
represents and shows unto your Honor:-

1. That the Complainant is over the age of twenty-one years
and a resident citizen of the State of Alabama, Baldwin County,
having been such a resident citizen for more than one year. That
George W. Jones is over the age of twenty-one years and is not a
resident of Alabama, and that his last known address was c/o Eddie
Lee Jones, General Delivery, Sneads, Florida.

2. That the Complainant and Respondent were married on, to-wit
February 27, 1950.

3. That the Complainant further avers that the Respondent
has, since her marriage with him, become addicted to habitual
drunkenness, and that said habit has continued to the filing of
this bill.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that George
W. Jones be made a party defendant to this cause by the usual pro-
cess of this Honorable Court, by service by Registered Mail, req-
uiring 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 that
she be granted a divorce from the said Respondent. Should your
Complainant be mistaken in the relief prayed for that she be granted
such other, further and different and general relief to which she
may be entitled and as in duty bound she will ever pray.



Solicitor for Complainant

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willing him to bread, answer or demand within the time and under the
cess of this Honorable Court, by service by registered mail, red-
M. Jones be made a party defendant to this cause by the next bro-

THE PREMISES CONSIDERED, your complaint prays that George

PRAYER FOR PROCESS AND RELIEF

this bill.

drunkenness, and that said spirit has continued to the killing of
has, since her marriage with him, become addicted to habitual

3. That the complainant further avers that the Respondent
February 27, 1920.

5. That the Complainant and Respondent were married on, to-wit,
the Jones, General Delivery, Mesquite, Florida.

Resident of Alabama, and that his last known address was c/o Eddie
George W. Jones is over the age of twenty-one years and is not a
having been such a resident citizen for more than one year. That
and a resident citizen of the State of Alabama, Baldwin County,

1. That the Complainant is over the age of twenty-one years
representation and avows unto your Honor:-

of complaint for divorce against George W. Jones, and respectfully
comes your Complainant, Edna Jones, and files this per Bill

COURT, ALABAMA, sitting in Equity:
TO THE HONORABLE M. M. HATT, JUDGE OF THE CIRCUIT COURT OF BALDWIN

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

EDNA JONES,
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-vs-
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FILED

NOV 20 1953

ALICE J. DUCK, Register