

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

EQUITY SIDE

TO

MAUDINE LUCIOUS

You are hereby notified to appear and plead, answer or demur within thirty days of the receipt hereof to the Bill of Complaint, filed in this Court at Bay Minette, Alabama, against you as Defendant, by EUGENE LUCIOUS, as Complaint.

WITNESS My hand this the 17th day of May, 1951.

Eugene Lucious
Register, Circuit Court.

TO THE

HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA: IN EQUITY:

Comes EUGENE LUCIOUS, and by this his Bill of Complaint, presented against MAUDINE LUCIOUS, respectfully shows:

FIRST: That Complainant and Defendant are both over the age of twenty-one years; that both are now and have been for more than five years prior to the filing of this Bill, bona fide residents of the State of Alabama.

SECOND: That Complainant and Defendant were married at Daphne, Alabama, on June 10, 1947, but have not lived together since August 14, 1949.

THIRD: That since August 14, 1949 Defendant has abandoned the bed and board of Complainant without just cause which abandonment has continued to the present time with no resumption of marital relations whatsoever.

THE PREMISES CONSIDERED, Complainant prays that MAUDINE LUCIOUS be made party defendant to this cause, and by proper process required to answer this Bill within the time prescribed by Law.

Complainant further prays that upon the hearing of this cause, a decree be rendered forever divorcing him from said MAUDINE LUCIOUS, granting him the right to marry again should he so desire, and to have such other, further or different relief as to equity may seem meet.

Elliott L. Rickaby
for
RICKARBY & RICKARBY
Solicitors for Complainant.

700 2648
RECORDED

EUGENE LUCIOUS,
Complainant

vs

MAUDINE LUCIOUS,
Defendant

SUMMONS AND COMPLAINT

FILED

MAY 17 1951

ALICE J. DUCK, Register

RICK ARBY & RICK ARBY

Received in Sheriff's Office
this 17 day of May 1951
TAYLOR WILKINS, Sheriff

Executed 5-26-51
By serving copy of
the within Summons
& complaint on
Maudine Lucious

Taylor Wilkins Sheriff
147 Hall P.S.

EUGENE LUCIOUS,

Complainant,

vs.

MAUDINE LUCIOUS,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

NO. 2648.

This cause coming on to be heard on the demurrer filed by the Respondent to the Bill of Complaint filed in the above styled cause, and the court being of the opinion that such demurrer should be sustained, it is therefore,

ORDERED, ADJUDGED AND DECREED by the Court that the demurrer to the Bill of Complaint be, and the same is hereby sustained.

Dated this 5th day of February, 1952.

Jeffery M. Madhery, Jr.
Judge.

DECREE SUSTAINING DEMURRER

EUGENE LUCIOUS,

Complainant,

vs.

MAUDINE, LUCIOUS,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

No. 2648.

Filed: February 5, 1952.

Alice J. Hensch

Register.

EUGENE LUCIOUS,

Complainant

-vs-

MAUDINE LUCIOUS,

Respondent

EQUITY No. 2648

CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

Comes the Complainant and by leave of the Court,
amends his bill of complaint by interpolating at the end of the
third line of Paragraph Three of said bill the words "the County
of Baldwin of" and prays that the Register of this Court interline
said words between the third and fourth lines of said Third
Paragraph.

Risley & Risley
Solicitors for Complainant.

RECORDED

Equity No. 2648

Eugene Lucious,
Complainant

-vs-

Maudine Lucious,
Respondent

Amendment to Bill

FILED

NOV 9 1951

ALICE J. DICK, Registrar

Rickaby & Rickaby

ELLIOTT G. RICKARBY

LAW OFFICES

RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

16 May 1951.

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

Dear Mrs. Duck:

LUCIOUS VS LUCIOUS: With this find Bill
of Complaint in this case.

Court costs will follow in a few days.

Very truly yours,

Elliott G. Rickaby
for
RICKARBY & RICKARBY

EGR:HB

Enc - 1

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NO 2648

Eugene Lucivius

vs.

Maudine Lucivius

Service

Filed 55. 17. 57

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AMERICAN BAR ASSOCIATION

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EUGENE LUCIOUS

Complainant

VS.

MAUDINE LUCIOUS

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the Respondent in the above styled cause and demurs to the Bill of Complaint filed in said cause and to each and every paragraph thereof, separately and severally and assigns the following separate and several grounds viz:

1. That said Complaint does not state a cause of action.

2. That it is not alleged that the respondent was, at the time of the filing of the Bill of Complaint, a resident citizen of Baldwin County, Alabama.

3. That it is not alleged in the Bill of Complaint that the separation occurred in Baldwin County, Alabama.

Hasan
By [Signature]
Solicitors For Respondent.

no 2648

RECORDED

DEMURRER

EUGENE LUCIOUS

Complainant

MAUDINE LUCIOUS

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed June 19, 1951

FILED

Register

JUN 19 1951

ALICE I. DUCK, Register

no 2648

RECORDED

DEMURRER

EUGENE LUCIOUS

Complainant

MAUDINE LUCIOUS

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed June 19, 1951

FILED

Register

JUN 19 1951

ALICE L. DUCK, Register

2648