

## 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 /7 day of May, 1951.

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.

RICKARBY & RICKARBY Solicitors for Complainant

Cliott & Ringel

RECORDED.

EUGENE LUCIOUS, Complainant

MAUDINE LUCIOUS, Defendant

SUMMONS AND COMPLAINT

MAY LZ 1951

ALICE L. DUCK, Register

Received in Sheriff's Office this day of 195

Executed 5-26-51
By serving copy of
The within Summer

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Togler William Shen, 144 14 all P.5.

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RICKARBY & RICKARBY

EUGENE LUCIOUS,	Q.	
Complainant,	ő	IN THE CIRCUIT COURT OF
Vs.	χ	BALDWIN COUNTY, ALABAMA
MAUDINE LUCIOUS,	χ	IN EQUITY.
MAODINII 10010009,	Ÿ.	No. 2648.
Respondent.	Q	

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.

Delfairs. Mashberry Jr.

### 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.

Register.

EUGENE LUCIOUS,

Complainant

-vs-

EQUITY No. 2648

CIRCUIT CORRT OF

BALDWIN CONNTY, ALABAMA

MAUDINE LUCIOUS,

Respondent

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.

Reisea de Ring Carly Solicitors for Complainant.

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Rickarby & Ruckarby

ELLIOTT G. RICKARBY

# RICKARBY & RICKARBY FAIRHOPE, ALABAMA 16 May 1951.

E. G. RICKARBY, JR.

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,

Ellevil 15. China for

RICKARBY & RICKARBY

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	EUGENE LUCIOUS	Ĭ	IN THE CIRCUIT COURT OF
	Complainant		BALDWIN COUNTY, ALABAMA
-	Vs.	, Q	IN EQUITY
	MAUDINE LUCIOUS	<b>Q</b>	
	Respondent		displaying an internal and a second a second and a second

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 occured in Baldwin County, Alabama.

olicitors for Respondent

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# RECORDED

### DEMURRER

EUGENE LUCIOUS

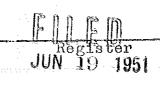
Complainant

MAUDINE LUCIOUS

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed June 19, 1951



Alles L Duck, Register

## RECORDED

### DEMURRER

EUGENE LUCIOUS

Complainant

MAUDINE LUCIOUS

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed June 19, 1951

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Allei I. Mick, Register

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