

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA

You are hereby commanded to summons BILLIE EDWARD WATSON, to appear, and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by MYRTLE SUE WATSON, as Complainant and Billie Edward Watson, as Respondent.

Witness my hand this the 10 day of June, 1951.

Register

MYRTLE SUE WATSON

COMPLAINANT

VS

BILLIE EDWARD WATSON

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

Your Complainant, Myrtle Sue Watson, respectfully represents unto
your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age, a bona fide resident of Perdido, Baldwin County, Alabama, and has been for more than two years, next preceding the filing of the bill of complaint; that the Respondent is over twenty-one years of age and a resident of Pensacola Florida, his particular address not being unknown and cannot be ascertained after a diligent search and inquiry.

2.

That your Complainant and the Respondent married at Pensacola, Florida on March 19, 1946, and lived together as husband and wife until August 14, 1949.

3.

That on August 14, 1949, while your Complainant and the Respondent were living together the Respondent voluntarily abandoned the bed and board of your Complainant, and has remained away voluntarily and continuously since that time.

4.

That the Complainant and the Respondent have no children.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Millie Edward Watson party respondent to this cause of action, requiring him to plead, answer and demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

~~Complainant further prays that upon a hearing hereof your Honor~~
will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that she be granted such other, further different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

W 7-6-57
RECORDED

MYRTLE SUE WATSON

COMPLAINANT

VS

WILLIAM EDWARD WATSON

RESPONDENT

2667

FILE OF COMPLAINT

FILED
JUN 6 1951
ALICE J. DUCK, Clerk