

3235

CARO IKNER
COMPLAINANT

VS.

LULA D. IKNER
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

NO. _____

Comes the Respondent in the above styled cause and appears specially for the purpose of filing this plea of abatement and for no other purpose, and files said plea separately and severally to each paragraph heretofore filed in the said cause and represents and shows unto the Court the following:

(1) That the Respondent is a resident citizen of Atmore, Escambia County, Alabama, and has been such a resident citizen all of her life.

(2) That the Respondent at the time of the filing of this cause of action and at all times prior thereto is and has been a resident citizen of Escambia County, Alabama.

(3) The Respondent and the Complainant last resided as husband and wife in the City of Atmore, Escambia County, Alabama and were bona fide resident citizens of Atmore, Escambia County, Alabama at the time ~~at~~ their separation occurred. Respondent therefore represents and shows unto the Court that the bill of complaint heretofore filed against her in the Court of Equity of Baldwin County, Alabama shall be abated because it was improperly filed and is in violation of Section 28 of title 34, of the Code of Alabama for 1940.

WITNESSES TO SIGNATURE BY MARK:

Wanda Smith
Ans White

STATE OF ALABAMA

ESCAMBIA COUNTY

Her mark

LULA D. X IKNER.
RESPONDENT, LULA D. IKNER

Before me, *Ans White*, a Notary Public in and for said County, and said State, personally appeared Lula D. Ikner the Respondent in the above styled cause, who, after being by me first duly sworn, says on oath that the facts set fourth in the foregoing plea are true and correct.

WITNESSES TO SIGNATURE BY MARK:

Wanda Smith
Ans White

Her mark

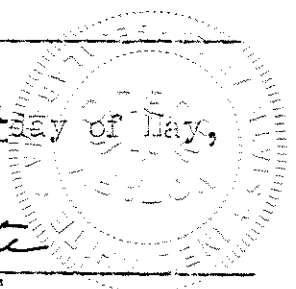
LULA D. X IKNER.

1954.

Sworn to and subscribed before me this the 11th day of May,

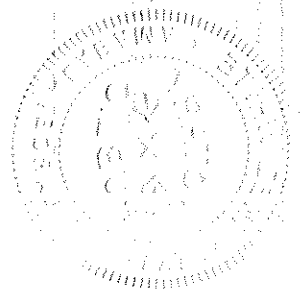
Notary Public, State of Alabama at Large
My commission expires Feb. 25, 1957.
Bonded by The Employers Liability Assurance Corporation

Ans White
NOTARY PUBLIC



3238
Shiner
VS
Shiner

FILED
JUN 14 1954
ALICE J. DICK, Register



TO ANY SHERIFF OF THE STATE OF ALABAMA:

Witness my hand this the 16th day of March, 1954.

Alice J. French
Register.

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY SITTING:

2.

That your Complainant and Respondent are residents of Baldwin County, Alabama, both are over the age of 21 years.

2.

That your Complainant and the Respondent married in Monroe County, Alabama, on, to-wit, September 15, 1936, and lived together as husband and wife until on to-wit, January 20, 1953.

3.

That on, to-wit January 20, 1953, while your Complainant and the Respondent were living at Atmore, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

Your complainant further avers and alleges that said Respondent has been guilty of adultery with divers parties and persons whose names to your Complainant are unknown.

5.

That there was born as fruits of this marriage between the Complainant and the Respondent six children: Junior Ikner, age 18 years, John L. Ikner, age 16 years, Willard Ikner, age 14 years, Lula Mae Ikner, age 3 years, Theodore Ikner, age 1½ years and Billie Ikner, age 3 months; That the mother of

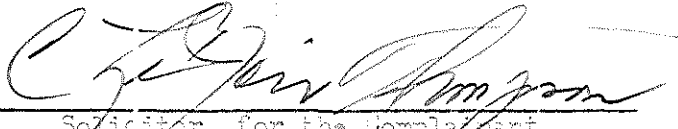
said children is a suitable, fit and proper person to have the care, custody and control.

6.

That your Complainant is purchasing 10 acres of land in Escambia County which your Complainant is ready, able and willing to convey to the Respondent as home for the Respondent and the children and further that your Complainant is employed and earns the sum of \$30.00 a week and is willing to pay over to the said Respondent as maintenance and support for the said children the sum of \$15.00 per week being one-half of the Complainant's earnings.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper procedure make the said Lula D. Eber, party Respondent to this bill of complaint requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

That upon final hearing of this cause your Honor will render a decree granting to each of the parties to this cause a divorce, and that your Complainant prays for such other, further and general relief, which he may be entitled and your complainant further prays, etc.


Solicitor for the Complainant

Respondent's Address is:

Route 3, Box 71
Almore, Alabama

703235

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

KARO THOMAS,

COMPLAINANT,

VS

LULA D. THOMAS,

RESPONDENT.

Bill of Complaint

FILED

APR 30 1954

ALICE L. BUCK, Register

C. Lenoir Thompson
Attorney At Law
Bay Minette, Alabama

Received 16 day of April 1954
and on 21 day of April 1954

I served a copy of the within
on Lula D. Thomas

By service on _____

J. L. Wilkins
TAYLOR WILKINS, Sheriff
By C. Shanks D.S.