

STATE OF ALABAMA)
)
BALDWIN COUNTY)

IN THE CIRCUIT COURT - IN EQUITY

[illegible]

You are hereby commanded to summon Maggie Hayes 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 Howard Hayes, as Complainant, against Maggie Hayes, as Respondent.

Witness my hand this 21st day of June, 1954.

~~Accession register.~~

HOWARD HAYES

Comme l'inant,

708

PAGE FIVE

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN SIGHT

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AND
TO THE HONORABLE HUBERT M. HALL, JUDGE THEREOF:

Comes your Complainant, the undersigned Howard Hayes, and respectfully represents and shows unto your Honor and unto this Honorable Court as follows:

FIRST

That he is over the age of twenty-one years and a resident citizen of the State of Alabama, his more particular address being Rosinton, Alabama, and that he has resided in the State of Alabama all of his life. That the Respondent, Maggie Hayes, is presently residing in Orlando, Florida, but that your Complainant does not know whether or not she is a resident of that State or of the State of Alabama, in which latter State she resided until March of 1953.

SECOND:

That your Complainant and the Respondent were married on November 20, 1934, in Bay Minette, Alabama, and they lived together as man and wife until, to-wit; March, 1953, when the Respondent voluntarily abandoned the bed and board of your Complainant and said abandonment has continued since said date and for more than one year next preceding the filing of this Bill of Complaint.

THIRD:

That there were born to your Complainant and the Respondent three children: Elmer J. Hayes, who is presently fourteen years of age, Carolyn J. Hayes, who is presently eight years of age and Martha S. Hayes, who is presently five years of age. That said minor children are presently residing with your Complainant in the home of his sister, Annie McCullough, in Rosinton, Alabama. That your Complainant is a fit and proper person to have the care, custody and control of said children and the Respondent is not a fit and proper person to have such care, custody and control of said minor children.

PRAYER FOR PROCESS:

The premises considered your Complainant respectfully prays that your Honor will cause the usual writ of process to be issued out of this Court directed to the said Respondent and requiring her to plead, answer or demur to this Bill of Complaint within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF:

The premises considered your Complainant respectfully prays that your Honor will, upon the filing of this Bill of Complaint, enter an order or decree awarding to your Complainant the temporary and full custody and control of said minor children pending a final determination of this cause. That on a final hearing of this cause that your Honor will enter an order or decree forever dissolving the bonds of matrimony which have heretofore existed between your Complainant and the Respondent and grant to him a absolute divorce from said Respondent for and on account of voluntary abandonment.

Your Complainant further prays that in and by the terms of said decree that your Honor will award to your Complainant the complete and permanent care, custody and control of the said Elmer J. Hayes, Carolyn J. Hayes and Martha S. Hayes, the minor children of your Complainant and the Respondent. And your Complainant prays for such other, further and different orders and decrees as in the premises will be meet and proper.

Howard Hayes
Complainant.

CHASON & STONE

By: Melvin P. Stone, Jr.
Solicitors for Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Norborne C. Stone, Jr., a Notary Public, in and for said County in said State, personally appeared Howard Hayes, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is Howard Hayes and that he is one and the same person as the Complainant in the foregoing Bill of Complaint and that his name is signed thereto as such. That the facts alleged in the foregoing Bill of Complaint are true and correct.

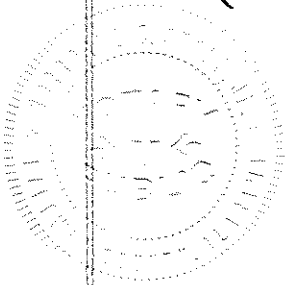
Dated this 21st day of June, 1954.

Howard Hayes
Howard Hayes

Sworn to and subscribed

before me this 21st day
of June, 1954.

Melvin P. Stone, Jr.
Notary Public, Baldwin County, Ala.



HOWARD HAYES,

Complainant,

vs.

MAGGIE HAYES,

Respondent.

I

I

I

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

ORDWR

This day came Howard Hayes and filed his Bill of Complaint under oath in this Court seeking a divorce from the Respondent and the permanent custody of the children born to said Complainant and the Respondent and praying that this Court enter an order awarding to the Complainant the temporary care, custody and control of said minor children pending a final determination of this cause. And the Court having considered the same is of the opinion that said Complainant should have the care, custody and control of said minor children pending a final determination of this cause, it is, therefore

ORDERED AND DECREED by the Court that Howard Hayes be, and he hereby is, awarded the temporary care, custody and control of Elmer J. Hayes, Carolyn J. Hayes, and Martha S. Hayes, the minor children born to the Complainant and the Respondent, pending the final determination of this cause and subject to such other and further orders and decrees as may be entered from time to time herein.

It is further ORDERED AND DECREED that a copy of this order be served upon the Respondent, Maggie Hayes, along with the Bill of Complaint heretofore filed by the Complainant.

Dated this 27 day of June, 1954.

Hubert M. Hall
Circuit Judge.

ALICE J. DUCK, Circuit Clerk

Baldwin County
BAY MINETTE, ALA.



3858
9/27

REASON CHECKED
Unclaimed _____
Unknown _____
Insufficient address _____
Moved, Left no address _____
No such office in state _____
Do not remove from this envelope

Deliver to Addressee Only

Registered

For Delivery Only to person
To Whom Addressed

Return Receipt Requested

Maggie Hayes
2717 Taylor Street,
Orlando, Fla.



*Unknown
Not at
no record
110
on
69*



RETURN RECEIPT REQUESTED



HOWARD HAYES,
Complainant,
vs.
MAGGIE HAYES,
Respondent.

I
I
I
I
I
I

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ORDER

This day came Howard Hayes and filed his Bill of Complaint under oath in this Court seeking a divorce from the Respondent and the permanent custody of the children born to said Complainant and the Respondent and praying that this Court enter an order awarding to the Complainant the temporary care, custody and control of said minor children pending a final determination of this cause. And the Court having considered the same is of the opinion that said Complainant should have the care, custody and control of said minor children pending a final determination of this cause, it is, therefore

ORDERED AND DECREED by the Court that Howard Hayes be, and he hereby is, awarded the temporary care, custody and control of Elmer J. Hayes, Carolyn J. Hayes, and Martha S. Hayes, the minor children born to the Complainant and the Respondent, pending the final determination of this cause and subject to such other and further orders and decrees as may be entered from time to time herein.

It is further ORDERED AND DECREED that a copy of this order be served upon the Respondent, Maggie Hayes, along with the Bill of Complaint heretofore filed by the Complainant.

Dated this 22 day of June, 1954.

Hubert M. Hall
Circuit Judge.

Stevens M. Steel
Circuit Judge.

Dated this 21 day of June, 1954.

Complaint heretofore filed by the Complainant.

be served upon the Respondent, Maggie Hayes, along with the Bill of
It is further ORDERED AND DECREED that a copy of this order
in.

further orders and decrees as may be entered from time to time here-
final determination of this cause and subject to such other and
children born to the Complainant and the Respondent, pending the
Minor J. Hayes, Carolyn J. Hayes, and Martha S. Hayes, the minor
he hereby is, awarded the temporary care, custody and control of

ORDERED AND DECREED by the Court that Howard Hayes be, and
fore

children pending a final determination of this cause, it is, there-
Complaint should have the care, custody and control of said minor
And the Court having considered the same is of the opinion that said
of said minor children pending a final determination of this cause.
awarding to the Complainant the temporary care, custody and control
and the Respondent and praying that this Court enter an order.

and the permanent custody of the children born to said Complainant
under oath in this Court seeking a divorce from the Respondent

This day came Howard Hayes and filed his Bill of Complaint.

ORDER

FILED
JUN 22 1954
ALICE L. DUCK, Register

Respondent.	I	IN ROUTE
MAGGIE HAYES,	I	
as.	I	BALDWIN COUNTY, ALABAMA
Complainant,	I	IN THE CIRCUIT COURT OF
HOWARD HAYES,	I	

STATE OF ALABAMA)
BALDWIN COUNTY) IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Maggie Hayes 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 Howard Hayes, as Complainant, against Maggie Hayes, as Respondent.

Witness my hand this 21st day of June, 1954.

Archie J. Hensley
Register.

HOWARD HAYES,		
Complainant,		IN THE CIRCUIT COURT OF
vs.		BALDWIN COUNTY, ALABAMA
MAGGIE HAYES,		IN EQUITY
Respondent.		

TO THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AND
TO THE HONORABLE HUBERT M. HALL, JUDGE THEREOF:

Comes your Complainant, the undersigned Howard Hayes, and respectfully represents and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That he is over the age of twenty-one years and a resident citizen of the State of Alabama, his more particular address being Rosinton, Alabama, and that he has resided in the State of Alabama all of his life. That the Respondent, Maggie Hayes, is presently residing in Orlando, Florida, but that your Complainant does not know whether or not she is a resident of that State or of the State of Alabama, in which latter State she resided until March of 1953.

SECOND:

That your Complainant and the Respondent were married on November 20, 1934, in Bay Minette, Alabama, and they lived together as man and wife until, to-wit; March, 1953, when the Respondent voluntarily abandoned the bed and board of your Complainant and said abandonment has continued since said date and for more than one year next preceding the filing of this Bill of Complaint.

THIRD:

That there were born to your Complainant and the Respondent three children: Elmer J. Hayes, who is presently fourteen years of age, Carolyn J. Hayes, who is presently eight years of age and Martha S. Hayes, who is presently five years of age. That said minor children are presently residing with your Complainant in the home of his sister, Annie McCullough, in Rosinton, Alabama. That your Complainant is a fit and proper person to have the care, custody and control of said children and the Respondent is not a fit and proper person to have such care, custody and control of said minor children.

PRAYER FOR PROCESS:

The premises considered your Complainant respectfully prays that your Honor will cause the usual writ of process to be issued out of this Court directed to the said Respondent and requiring her to plead, answer or demur to this Bill of Complaint within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF:

The premises considered your Complainant respectfully prays that your Honor will, upon the filing of this Bill of Complaint, enter an order or decree awarding to your Complainant the temporary and full custody and control of said minor children pending a final determination of this cause. That on a final hearing of this cause that your Honor will enter an order or decree forever dissolving the bonds of matrimony which have heretofore existed between your Complainant and the Respondent and grant to him a absolute divorce from said Respondent for and on account of voluntary abandonment.

Your Complainant further prays that in and by the terms of said decree that your Honor will award to your Complainant the complete and permanent care, custody and control of the said Elmer J. Hayes, Carolyn J. Hayes and Martha S. Hayes, the minor children of your Complainant and the Respondent. And your Complainant prays for such other, further and different orders and decrees as in the premises will be meet and proper.

Howard Hayes
Complainant

CHASON & STONE

By:

Norborne C. Stone, Jr.
Solicitors for Complainant.

Orlando, Fla.
2115 Taylor St.
2115 Taylor St.

FILED

JUN 18 1954

WIT 1 MCK, Notary

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Norborne C. Stone, Jr., a Notary Public, in and for said County in said State, personally appeared Howard Hayes, who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is Howard Hayes and that he is one and the same person as the Complainant in the foregoing Bill of Complaint and that his name is signed thereto as such. That the facts alleged in the foregoing Bill of Complaint are true and correct.

Dated this 21st day of June, 1954.

Howard Hayes
Howard Hayes

Sworn to and subscribed

before me this 21st day
of June, 1954.

Norborne C. Stone, Jr.
Notary Public, Baldwin County, Ala.

NOTARY PUBLIC, BALDWIN COUNTY, ALA.
Charles G. Stone

of June, 1924.

before me this 5th day

Sworn to and subscribed

Howard Hayes
Howard Hayes

Dated this 5th day of June,

in the foregoing Bill of Complaint are true and correct
and that his name is signed thereto as such. That the
same person as the Complainant in the foregoing Bill of

That his name is Howard Hayes and that he is on
legally sworn, did depose and say under oath as follows
Hayes, who is known to me and who, after being by me li
in and for said County in said State, personally appear

before me, *Charles G. Stone, Jr.*, a Notary

BALDWIN COUNTY

STATE OF ALABAMA

BY:

Charles G. Stone, Jr.
Solicitor for Complainant.

CHAS. G. STONE

NO 3279

2717 Taylor St.
Orlando, Fla.

Howard Hayes
Complainant

Premises will be met and proper.

such other, further and different orders and decrees as
Complainant and the Respondent. And your Complainant
Carlson J. Hayes and Martha S. Hayes, the minor child
and permanent care, custody and control of the said Bill

RECEIPT FOR REGISTERED ARTICLE No. 214

Fee paid 30

9-23, 1954
(Date)

Class postage paid 1

Return receipt fee 7

Special delivery fee ✓

Declared value, \$ none

Surcharge paid, \$ _____

Restricted delivery
(Accepting employee will place
initials in proper space)

in person ✓

or order _____

Fee paid 70

From Alvin J. Duck
(Sender)

(Street and number)

(Post office and State)

Addressed to Maggie Hoyer
(Addressee)

(Street and number)

(Post office and State)

Postmaster, per RAF

