

3322

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons PARALEE HOLMAN 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 Wallace M. Holman, as Complainant, and against Paralee Holman, as Respondent.

WITNESS my hand this the _____ day of _____, 1954.

Register

WALLACE M. HOLMAN	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA,
VS	Ø	IN EQUITY
PARALEE HOLMAN	Ø	
RESPONDENT	Ø	

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

Your Complainant, Wallace M. Holman, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant, Wallace M. Holman, is over twenty-one years of age, a bond fide resident of Baldwin County, Alabama, and has been for more than ten years next preceding the filing of this bill of complaint; that the Respondent, Paralee Holman, is over twenty-one years of age, and a non-resident of the State of Alabama, her address cannot be ascertained after a diligent search and inquiry:

2.

That your Complainant and the Respondent married at Milton, Florida, on July 2, 1930, and lived together as husband and wife until in to-wit, 1935.

3.

That in 1935, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Paralee Holman 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.

Your Complainant further prays that upon a final hearing hereof Your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.

WALTER S. BRANTLEY

By:

Walter M Brantley
Solicitor for the Complainant

3327

WALLACE M. HOLMAN

COMPLAINANT

VS

PARADISE HOLMAN

RESPONDENT

BILL OF COMPLAINT

FILED
AUG 11 1954

ALICE J. DUCK, Register

THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT, IN EQUITY

No. _____, Term, 19____

Wallace M. Holman

Complainant

Vs.

Paralee Holman

Defendant

Motion is hereby made for a Decree Pro Confesso against _____

Paralee Holman

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 14th day of Dec, 1954

746 Code

Wallace M. Brantley Solicitor.

WALLACE M. HOLMAN
COMPLAINANT
VS
PARALEE HOLMAN
RESPONDENT

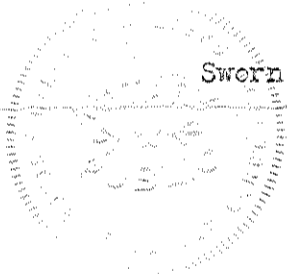
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

Before me, Harry J. Wilters, Jr., a Notary Public, in and for State of Alabama, at large, personally appeared Tolbert M. Brantley, Solicitor for Complainant in the above styled cause who being first duly sworn, deposes and says that he has been informed and believes and upon such information and belief says: That the Respondent in the above styled cause is a non-resident of the State of Alabama, that his place of residence is unknown; and that it cannot be ascertained after reasonable effort and inquiry, and further that in the belief of said affiant said Respondent is over the age of twenty-one years.

Tolbert M. Brantley

Sworn to and subscribed before me on this the 10 day of Aug, 1954.

Harry J. Wilters, Jr.
Notary Public,



3327

WALLACE M. HOLMAN

COMPLAINANT

VS

PARALEE HOLMAN

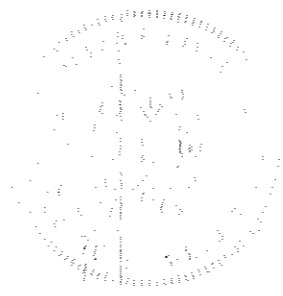
RESPONDENT

AFFIDAVIT OF NON RESIDENCE

FILED

AUG 11 1954

ALICE A. DUCK, Register



Handwritten notes and signatures, including the name 'ALICE A. DUCK' and a date 'AUG 11 1954'.

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

WALTER M. BRANTLEY

No. 3327

The State of Alabama,

Baldwin _____ County.

vs.

PARALEE POLMAN

Circuit Court, in Equity

This the 13th day of August 1945

In this cause it being made to appear to the Clerk of this Court by the affidavit of Walter M. Brantley

that the Defendant PARALEE POLMAN

is a non-resident of the State of Alabama and her place of residence is unknown

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Paralee Polman the said Respondent

to answer or demur to the Bill of Complaint in this cause by the 13th day of September 1945, or after thirty days therefrom a decree Pro Confesso may be taken against her

Register.

Walter M. Brantley,
Solicitors For Complainant

THE BALDWIN TIMES

BALDWIN COUNTY

Alabama's Best County's Best Newspaper

BAY MINETTE, ALABAMA

JIMMY FAULKNER
PUBLISHER

NOTICE TO NON-RESIDENT

WALLACE M. HOLMAN
No. 3327

vs.

PARALEE HOLMAN
STATE OF ALABAMA
COUNTY OF BALDWIN

Circuit Court, in Equity

This the 13th day of August,
1954

In this cause it being made to appear to the Clerk of this Court by the affidavit of Tolbert M. Brantley that the Defendant Paralee Holman is a non-resident of the State of Alabama and her place of residence is unknown and further, that, in the belief of said Affidavit the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Paralee Holman the said Respondent to answer or demur the Bill of Complaint in this cause by the 13th day of September 1954, or after thirty days therefrom a decree Pro Confesso may be taken against her.

Alice J. Duck, Register
Wilters & Brantley,
Solicitors for Complainant

32-4tc.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

E. R. Moussette, Jr., being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Wallace M. Holman vs. Paralee Holman

COST STATEMENT

167 WORDS @ 6 1/2 cents _____ \$ 10 85

I hereby certify this it correct, due and unpaid (paid).

E. R. Moussette, Jr.
PUBLISHER
EDITOR

was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication Aug. 26, 1954 Vol. 65 No. 32
Date of 2nd publication Sept. 2, 1954 Vol. 65 No. 33
Date of 3rd publication Sept. 9, 1954 Vol. 65 No. 34
Date of 4th publication Sept. 16, 1954 Vol. 65 No. 35

Subscribed and sworn before the undersigned this 16 day of Sept, 1954.

Dorothy Martin
Notary Public, Baldwin County.

E. R. Moussette, Jr.
PUBLISHER
EDITOR

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. _____, Term, 19____

Wallace M. Holman _____ Complainant

Vs.

Paralee Holman _____ Defendant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 26th day of August, 1954, in the Baldwin Times a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 26th day of August 1954 and _____

And it now further appearing to the Register Alice J. Duck that the said Paralee Holman

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant _____, ordered and decreed by the Register Alice J. Duck _____ that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Paralee Holman

This _____ day of _____ 19____

Register.