

1119

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

Kimmile Lee Johnson.
Complainant,
Vs. Theлма. Johnson.
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____
Theлма. Johnson.

by the Sheriff of Baldwin. County, on the 26th day of May.
194 4.

And it further appears to the Register, that the said Theлма Johnson.

_____, the Respondent_____, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of Horne & Hodnette. Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said _____

Theлма Johnson.

This 21st day of August., 194 4.

[Signature]
Register.

THE STATE OF ALABAMA, BALDWIN County

In the Circuit Court, In Equity.

Kemmie Lee Johnson Complainant

vs.

Thelma Mae Johnson Respondent

Now comes the Complainant by his Solicitor of Record and shows the court that on the 2~~8~~ 5th day of May, 1944 he filed his Bill of Complaint in the above stated cause, and a summons issued in said cause and was served by the Sheriff of Baldwin County on the Defendant more than thirty days prior to this date, and said Defendant has to this date failed to appear and demur, plead to, or otherwise answer the allegations of said Bill of Complaint as required by law, the Complainant by HIS Solicitor of Record now moves the Register of this Court to enter up or render a Decree Pro Confesso in this cause against said Defendant.

This 19 day of August, 1944.

Frank S. Harne

Solicitor for Complainant.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY } No. 1119.

CIRCUIT COURT BALDWIN COUNTY

May. TERM, 194 4

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Thelma Johnson.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

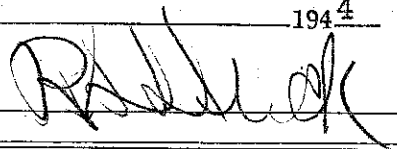
Thelma, Johnson.

Respondent.
~~Defendant~~

by Kimmie Lee Johnson.

Complainant.

Witness my hand this 15th day of May. 194 4


Clerk.

KIMMIE LEE JOHNSON, COMPLAINANT, VS. THELMA JOHNSON, RESPONDENT.	} } }	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY. NO _____.
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Now comes the Complainant, Kimmie Lee Johnson, humbly complaining of the Respondent, Thelma Johnson, in a matter of divorce as will hereinafter appear and represents and shows unto your Honor as follows:-

FIRST: That both the Complainant and Respondent are bona-fide residents of Baldwin County, Alabama, and have both so resided for more than one year next immediately preceding the date of the filing of this Bill of Complaint; that both the Complainant and Respondent are over the age of twenty-one years.

SECOND: That Complainant and Respondent were married to each other at Perdido, Baldwin County, Alabama, on, to-wit, the 4th day of January, 1933, and lived together thereafter until on, to-wit, the 1st day of May, 1944.

THIRD: That there was born to the union of the Complainant and Respondent four children, Mamie Lee Johnson, a girl now about nine years of age; Minnie Cloud Johnson, a girl now about six years of age; Shirley Ann Johnson, a girl now about four years of age; and Moses Jerry Johnson, a boy now about two years of age. That these children are now in the custody of the Complainant who loves them with the lasting love of a father and is a suitable person to be entrusted with their care and custody; while the Respondent owing to the fact that she lives a wild and dissolute life is not a suitable person to be entrusted with the care and custody of these children.

FOURTH: That on or about the 20th day of April, 1944, the Respondent committed acts of adultery with divers men whose names are unknown to the Complainant and that Complainant discovered her infidelity on, to-wit, the 1st day of May, 1944, and has not lived with her since and has not forgiven her for her conduct and that this adultery was not through any collusion between the parties.

PRAYER FOR PROCESS

To the end that equity may be had in the premises, Complainant prays that Thelma Johnson, be made party Respondent to this Bill of Complaint, and that a summons be issued and together with a copy of this Bill of Complaint, be served upon her and that she be required to plead, answer or demur to the within complaint within the time and under the penalties prescribed by law, and the rules of this Honorable Court.

PRAYER FOR RELIEF

Premises considered, Complainant prays that on a final hearing of this cause your Honor will make and enter a decree dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent and grant to the Complainant a full and absolute divorce from the said Respondent. Complainant prays that in and by virtue of the decree he will be granted the right to again contract marriage.

Complainant prays that in and by virtue of said decree he will be granted the custody of the minor children, Mamie Lee Johnson, Minnie Cloud Johnson, Shirley Ann Johnson and Jerry Moses Johnson, subject, however to the future orders of this Honorable Court.

Complainant prays all other, farther and additional relief to which he may be entitled the premises considered, and he will ever pray, etc. etc.

By *Sherry G. Hatwill*
Sherry G. Hatwill
SOLICITORS FOR COMPLAINANT

The State of Alabama

Baldwin. COUNTY

In Circuit Court, in Equity

Kimie Lee Johnson.

vs. Complainant,

Thelma. Johnson.

Respondent.

**MOTION FOR DECREE PRO CONFESSO
ON PERSONAL SERVICE.**

Filed August. 21 1954

R S Duck. Register

Recorded in

Record

Vol. _____ Page _____

Register

No. 1119

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

Kimmie Lee Johnson.

Complainant,

Vs.

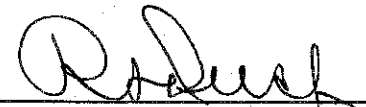
Thelma. Johnson.

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 21~~st~~ of August.

194 4



Register.