

1141

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Robert Johnson to appear within thirty days from the service of this Writ in the Circuit Court, Equity Side, to be held for said county at the place of holding same, then and there to demur, plead to or answer the Bill of Complaint of Myra Belle Johnson.

Witness my hand this 22 day of June, 1944.

*R. L. Duck*

Register.

Respondent, Robert Johnson, resides at Belforest, Alabama.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your Oratrix, Myra Belle Johnson, presents this Bill of Complaint against Robert Johnson, and thereupon your Oratrix complains and shows unto the Court and your Honor as follows:

1. Your Oratrix is over twenty-one years of age and a bona fide resident citizen of Baldwin County, Alabama, where she has resided continuously for more than one year next preceding the filing of this Bill of Complaint. The Respondent, Robert Johnson, is over twenty-one years of age and a resident of Baldwin County, Alabama.

2. Your Oratrix and the Respondent were lawfully married in Belleville, Alabama in January, 1927 and lived together as man and wife until April, 1938 when the Respondent voluntarily abandoned your Oratrix without fault on her part. Your Oratrix and the said Respondent have not lived together since the said date.

3. Your Oratrix is the mother, and the Respondent is the father of Leroy Johnson, a minor fourteen years of age, who is now in the custody and under the control of your Oratrix who is in all respects a fit and proper person to have the custody and control of the said minor.

#### PRAYER FOR PROCESS

Your Oratrix prays that the Court will take jurisdiction of the cause made by this Bill of Complaint and that due notice thereof be given to the Respondent, Robert Johnson, in the form and manner prescribed by law requiring him to plead, answer or demur to the said Bill of Complaint within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

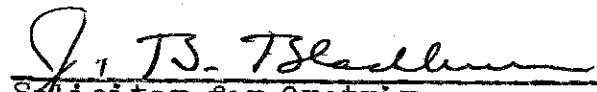
#### PRAYER FOR RELIEF

THE PREMISES CONSIDERED your Oratrix respectfully prays for the following relief:

1. That the bonds of matrimony now existing between your Oratrix and the said Respondent, Robert Johnson, be dissolved and that your Oratrix be forever divorced from him.

2. That your Oratrix be granted the right to remarry.
3. That your Oratrix be given the permanent custody and control of the minor child, Leroy Johnson.
4. Your Oratrix further prays for such other, further and general relief as she may be equitably entitled to the premises considered.

Respectfully submitted,

  
Solicitor for Oratrix.

11415

Executed June 23 1944  
by serving copy of within Summons and

Complaint on  
*Robert Johnson*

*W.R. Stewart* Sheriff

By *O.B. Spencer* Deputy Sheriff

BILL OF COMPLAINT

MYRA BELLE JOHNSON,

Complainant,

VS.

ROBERT JOHNSON,

Respondent.

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

*Filed June 22 1944  
W.R. Stewart,  
Deputy Sheriff*