

1163

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

WE COMMAND YOU, that you summon JANIE MC CARTNEY to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising chancery jurisdiction within sixty days after the service of the summons, and there to plead, answer or demur without oath to a bill of complaint lately exhibited by WILLIAM T. MC CARTNEY, Complainant, against the said JANIE MC CARTNEY and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc.. And we further command that you return this writ, with your endorsement thereon, to our said court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this the 19 day of July, 1944.

R. S. Duck
Register

WILLIAM T. MC CARTNEY,
COMPLAINANT
VS
JANIE MC CARTNEY,
RESPONDENT.

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

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

Now comes your Complainant, William T. McCartney, and humbly complaining against the Respondent, Janie McCartney, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

The Complainant is over 21 years of age, and a bona fide resident of Baldwin County, Alabama, living at Fairhope; that the Respondent is over 21 years of age, and a bona fide resident of the State of Alabama, living at 602 Virginia Street, Mobile, Alabama;

2.

That the Complainant and the Respondent are husband and wife having married at Norfolk, Virginia, on December 24, 1939; that they lived together as husband and wife until on to-wit, November, 1942; that they were living at Fairhope, Alabama, Baldwin County, at the time of the separation; that on, to-wit,

November, 1942, the Respondent voluntarily abandoned the bed and board of the 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 Janie McCartney 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.

Complainant further prays that upon a final hearing of this cause an order and decree be made granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that your complainant prays for such other, further different and general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

BY 

Solicitors for Complainant

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WILLIAM E. MC CARTNEY

COMPLAINANT

VS

X *at* *mother*

JANIE MC CARTNEY

RESPONDENT

\$600
Dunham Street
Mobile Ala

Personal

200 July 19 1944
J. H. [unclear]

~~Handwritten scribble~~

Received 24 Day of July 1944
and on 24 Day of July 1944
I served a Copy of the within 24
at Janie Mc Cartney
by service on _____

W. H. HOLCOMBE, Sheriff
K. Matthews D.S.