

3559

T. S. BAKER,
Complainant,
vs.
BESSIE BAKER,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the Respondent in the above styled cause and demurs to the Bill of Complaint filed in said cause and each and every paragraph thereto separately and severally and assigns the following separate and several grounds:

1. That said Bill of Complaint does not state a cause of action.
2. That paragraph 1 of said Bill of Complaint fails to allege that the Respondent is a resident citizen of Baldwin County, Alabama.
3. That paragraph 2 of the Bill of Complaint fails to allege that the Complainant and the Respondent married each other.
4. That paragraph 2 of the Bill of Complaint fails to sufficiently state the date of marriage.
5. That said Complaint fails to allege the date that Respondent is alleged to have abandoned the Complainant.
6. That said Complaint does not allege that such abandonment was without just cause or legal excuse.
7. That said Complaint does not allege that the Complainant is a fit and proper person to have the care, custody and control of said minor.

CHASON & STONE

By:


Solicitors for Respondent.

DEMURRER

T. S. BAKER,

Complainant,

vs.

BESSIE BAKER,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY - 3559

Filed August 4, 1955.

Alice J. Duck
Register. *W.*

STATE OF ALABAMA)
*
BALDWIN COUNTY)

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bessie Baker to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, in Equity, at the place of holding same, then and there to plead, answer or demur to the Bill of Complaint filed by T. S. Baker.

Dated this 6th day of July, 1955.

Arcif. Rensch
Register

Respondent's address is C/o Hinote Meat Packing Plant, Rosinton, Alabama.

* * * * *

T. S. BAKER,	}	
Complainant,		IN THE CIRCUIT COURT OF
VS.		BALDWIN COUNTY, ALABAMA
BESSIE BAKER,		IN EQUITY
Respondent.	}	

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

Your Complainant, T. S. Baker respectfully represents and shows unto the court and your honor as follows:

1. That he is over the age of twenty-one years and a resident of Baldwin County, Alabama, and has been a bona fide resident citizen of Baldwin County, Alabama, for more than one year next preceding the filing of this Bill of Complaint. That the Respondent is over the age of twenty-one years and a resident of Baldwin County, Alabama.
2. That your Complainant and Respondent were lawfully married in the year 1948, in Lucedale, Mississippi.
3. There was born to this marriage one child, a daughter, Sara Jane Baker, six years of age. The said child is now in the care, custody and control of the Respondent, Bessie Baker.

Complainant further avers that the said Respondent voluntarily abandoned the bed and board of your Complainant for

more than one years next preceding the filing of this Bill of Complaint, since which time Complainant and Respondent have not lived together or any way recognized each other as husband and wife, the premises considered, your Complainant makes the said Bessie Baker a party respondent to this Bill of Complaint, and in order that your Complainant may have the relief herein prayed for, may it please the court to cause the States Writ of Subpoena to be issued, directed to the said Bessie Baker, commanding her to plead, answer or demur, to this complaint, within the time required by law and that on a final hearing of this cause that the court will make and enter a decree granting to the Complainant an absolute divorce from the said Respondent, and will order that the Complainant be granted the care, custody and control of said minor child for a certain period of time each year which may seem proper to the court and that the court will grant such other, further and different relief as may be meet and proper, the premises considered.

James R. Owen
Solicitor for Complainant

SUMMONS AND BILL OF COMPLAINT

Received 6 day of July 1955
and on 14 day of July 1955
served a copy of the within Bill of Complaint

By service on Bessie Baker

TAYLOR WILKINS, Sheriff

By Edleigh Steadler D. S.

T. S. BAKER,

Complainant,

VS.

BESSIE BAKER,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

FILED

JUL 6 1955

ALICE L. DICK, Register

T. S. BAKER,

Complainant,

vs.

BESSIE BAKER,

Respondent.

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

This matter coming on to be heard on the demurrer filed by the Respondent to the Bill of Complaint filed in said cause, and the Court having considered the same is of the opinion that the demurrer should be sustained.

It is, therefore, ORDERED, ADJUDGED, and DECREED by the Court that the demurrer to the Bill of Complaint filed in said cause be and the same hereby is sustained.

Done this January 17, 1956.

Thurman H. Allen

Judge.

T. S. BAKER,

Complainant,

VS.

BESSIE BAKER,

Respondent.

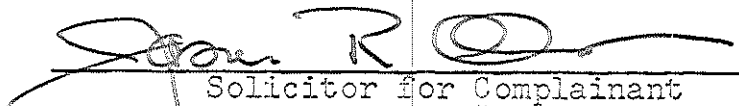
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

MOTION TO DISMISS

Now comes the Complainant, by his attorney, and moves the Court to dismiss this said cause with the consent of the Respondent.


Solicitor for Complainant

* * * * *

ORDER

This cause having been presented to the Court on this date and it appearing to the Court that the Complainant desires to dismiss this cause with the consent of the Respondent, it is, therefore,

ORDERED, ADJUDGED AND DECREED that this cause be and it hereby is dismissed.

ORDERED, ADJUDGED AND DECREED on this the 4 day of August, 1956.


Judge.

MOTION TO DISMISS

T. S. BAKER,
Complainant,
VS.
BESSIE BAKER,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

COURT FOR BALDWIN COUNTY

[Handwritten signature]

T. S. BAKER,

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VS.

BESSIE BAKER,

Respondent.

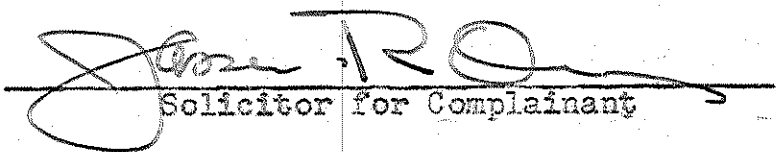
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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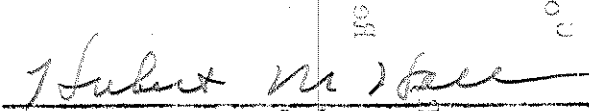
* * * * *

ORDER

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ORDERED, ADJUDGED AND DECREED on this the 4 day of August, 1956.


Judge.

BESSIE BAKER

AS

J. S. BAKER

MOTION TO DISMISS

MOTION TO DISMISS

3559

T. S. BAKER,

VS.

BESSIE BAKER,

Complainant,

Respondent.

Judge

IN THE CIRCUIT COURT OF

ALABAMA

BALDWIN COUNTY, ALABAMA

IN EQUITY

August, 1908

ORDERED, ADJUDGED AND DECREED that this cause be and it

ORDERED, ADJUDGED AND DECREED on this day of

to be dismissed.

ORDER

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Solicitor for Complainant

Respondent.

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MOTION TO DISMISS

Respondent.

BESSIE BAKER,

VS.

Complainant,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

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T. S. BAKER,