(3580)

DIVORCE DECREE

PRINTED BY MOORE PTG CO.

# The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

ROBERT H. WILMER, Complainant

vs.

CONSTANCE WILMER, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on publication and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the said ROBERT H. WILMER is forever divorced from the said CONSTANCE WILMER for and on account of Voluntary abandonment

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that ROBERT H. WILMER the Complainant pay the cost herein to be taxed, for which executed may issue.

This 15 day of December, 19 55.

Hubert M Hall

Judge Circuit Court, In Equity.

I, _____, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day of _____, 19____

_____

Register of Circuit Court, In Equity.

No._____ Page_____

THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

ROBERT H. WILMER

Complainant

vs.

CONSTANCE WILMER

Respondent

# DIVORCE DECREE

FILED
DEC 13 - 1955
ALICE J. DUCK, Register

| | | |
|---|---|---|
| ROBERT H. WILMER<br>COMPLAINANT<br>VS<br>CONSTANCE WILMER<br>DEFENDANT | I<br>I<br>I<br>I<br>I<br>I<br>I<br>I<br>I<br>I | IN THE CIRCUIT COURT OF<br>BALDWIN COUNTY, ALABAMA<br>IN EQUITY |

ORIGINAL BILL

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT:

Your complainant, Robert H. Wilmer, represents and shows unto your Honor as follows:

1. That he is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama, and has been such for three years next preceding the filing of this his bill of complaint, and is now serving in the armed forces of the United States.

2. That Constance Wilmer, the defendant, is over the age of twenty-one years and is a resident of Boston, Massachusetts.

3. That your complainant and respondent were lawfully married in Boston, Massachusetts, on the 22nd day of May, 1953, and lived together as husband and wife until she abandoned him as hereinafter set forth.

4. Complainant further avers that said respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, since which time complainant and respondent have not lived together nor in any way recognized each other as husband and wife.

The Premises Considered, your complainant makes the said Constance Wilmer a party respondent to this Bill of Complaint, and in order that the complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to issue, directed to the said Constance Wilmer, commanding her to answer, plead or demur to this Bill of Complaint within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, granting the complainant the right to remarry; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper.

RICKARBY AND RICKARBY

BY _____

E. G. Rickarby, Jr.
Solicitor for Complainant

The State of Alabama
Baldwin County } Circuit Court Equity

To Constance Wilmer

12 Chelsea Street,

Boston, Mass

You are hereby commanded to appear and plead, answer or demur, within thirty days from the service hereof, as provided by an Act of the Legislature of Alabama, approved September 25th, 1919, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, against you, Defendant....., by Robert H. Wilmer Complainant.....

A copy of which Bill of Complaint is hereto attached.

Witness by hand, this 16th day of August, 195

Register

| | |
|---|---|
| ROBERT H. WILMER<br>COMPLAINANT<br>VS<br>CONSTANCE WILMER<br>RESPONDENT | IN THE CIRCUIT COURT OF<br>BALDWIN COUNTY, ALABAMA<br>IN EQUITY |

ANSWER AND WAIVER

Comes the respondent, CONSTANCE WILMER, in the above styled cause and for answer to the Bill of Complaint heretofore filed in said cause, and to each and every paragraph thereof, says:

She denies each and every allegation contained therein and demands strict proof thereof.

Respondent hereby submits herself to the jurisdiction of this Honorable Court and waives notice of the time and place for taking testimony in said cause, waives the issuance of a formal commissioner to take testimony in said cause and consents that testimony may be taken without further notice to her and further waives notice of the time and place of submission of said cause and consents that said cause may be submitted for final decree at any time or place without further notice to her of such submission.

Mrs Constance Wilmer
Constance Wilmer, Respondent

STATE OF Massachusetts
~~Suffolk~~ COUNTY

I, Alfred Black, a Notary Public in and for said County, in said State, hereby certify that CONSTANCE WILMER, whose name is signed to the foregoing instrument and who is known to me to be the Respondent above named, acknowledged before me on this date that she executed the foregoing instrument voluntarily with knowledge of its contents.

WITNESS my hand and official seal this the 23rd day of July, 1955.

FILED
JUL 28 1955
ALICE J. DUCK, Register

Alfred Black
Notary Public
My Commission Expires May 4, 1956

| | | |
|---|---|---|
| ROBERT H. WILMER,<br><br>COMPLAINANT<br><br>VS<br><br>CONSTANCE WILMER,<br><br>RESPONDENT | ‖ | IN THE CIRCUIT COURT OF<br>BALDWIN COUNTY, ALABAMA<br>IN EQUITY |

NOTE OF EVIDENCE

This cause is submitted for final decree on Complainant's Bill, Decree Pro Confesso on publication, deposition of Complainant, and testimony in open court of W. T. WILMER.

RICKARBY & RICKARBY

BY _____
E. G. Rickarby, Jr.
Solicitor for Complainant

Rice Sudrick
Register

Answers to the questions asked by the Circuit Court of Baldwin County, Alabama

1. Robert H. Wilmer, Age 27, Permanent address box 649, Fairhope, Alabama.
2. Yes
3. No
4. Constance M. Wilmer, Address 12 Chelsea Street, Charlestown, Mass. Age 24.
5. Boston, Mass. May 22, 1953.
6. 11 Months and 20 Days.
7. May 20, 1954 when I transferred to Virginia.
8. Yes.
9. Yes. I rented an apartment at Virginia Beach for 3 months on a years lease, arranged for furniture to be shipped and wrote her to come down to Virginia to live. She did not come down at any time, because she did not want to live in Virginia.
10. No, I did have two letters but have lost them someplace.
11. None at all.
12. I saw her in Boston, Mass., on July 17, 1954, twice when I went up to find out why she had not come down.
13. 12 Chelsea Street, Charlestown, Massachusetts.

Signed by Robert H Wilmer

Subscribed and sworn to me this day of 1955.

Notary Public Richard N. Pennington

Witness Thomas D. Brooks

Answers to the questions asked by the Circuit
Court of Baldwin County, Alabama

1. Robert H. Wilmer, Age 27, Permanent address box 649, Fairhope, Alabama.
2. Yes
3. No
4. Constance M. Wilmer, Address 12 Chelsea Street, Charlestown, Mass. Age 24.
5. Boston, Mass. May 22, 1953.
6. 11 Months and 20 Days.
7. May 20, 1954 when I transferred to Virginia.
8. Yes.
9. Yes. I rented an apartment at Virginia Beach for 3 months on a years lease, arranged for furniture to be shipped and wrote her to come down to Virginia to live. She did not come down at any time, because she did not want to live in Virginia.
10. No, I did have two letters but have lost them someplace.
11. None at all.
12. I saw her in Boston, Mass., on July 17, 1954, twice when I went up to find out why she had not come down.
13. 12 Chelsea Street, Charlestown, Massachusetts.

Signed by Robert H. Wilmer

Subscribed and sworn to me this day of 1955.

Notary Public

Witness

Answers to the questions asked by the Circuit Court of Baldwin County, Alabama

1. Robert H. Wilmer, Age 27, Permanent address box 649, Fairhope, Alabama.
2. Yes
3. No
4. Constance M. Wilmer, Address 12 Chelsea Street, Charlestown, Mass. Age 24.
5. Boston, Mass. May 22, 1953.
6. 11 Months and 20 Days.
7. May 20, 1954 when I transferred to Virginia.
8. Yes.
9. Yes. I rented an apartment at Virginia Beach for 3 months on a years lease, arranged for furniture to be shipped and wrote her to come down to Virginia to live. She did not come down at any time, because she did not want to live in Virginia.
10. No, I did have two letters but have lost them someplace.
11. None at all.
12. I saw her in Boston, Mass., on July 17, 1954, twice when I went up to find out why she had not come down.
13. 12 Chelsea Street, Charlestown, Massachusetts.

Signed by Robert H. Wilmer

Subscribed and sworn to me this day of 1955.

Notary Public

Witness

| | | |
|---|---|---|
| ROBERT H. WILMER, COMPLAINANT, | ‖ | IN THE CIRCUIT COURT OF |
| VS. | ‖ | BALDWIN COUNTY, ALABAMA |
| CONSTANCE WILMER, RESPONDENT | ‖ | IN EQUITY |

Comes your Complainant, ROBERT H. WILMER, by his attorney, and respectfully shows that he is now in Norfolk, Virginia and his address is 829 East 25th Street, Norfolk, Virginia and he desires to offer his testimony in the above mentioned cause as witness in his own behalf and files the following interrogatories so that his testimony may be reduced to writing and filed in this cause:

Interrogatory No. 1. State your name and age and your permanent residence.

Interrogatory No. 2. Do you regard Baldwin County, Alabama as your home?

Interrogatory No. 3. Have you taken up a permanent residence outside of Baldwin County, Alabama?

Interrogatory No. 4. What is your wife's name, where does she live and how old is she?

Interrogatory No. 5. When and where were you married?

Interrogatory No. 6. After you were married, how long did you and your wife live together?

Interrogatory No. 7. When did you and your wife separate?

Interrogatory No. 8. After you and your wife separated, did you get an apartment for her?

Interrogatory No. 9. Did you ask her to come down and live with you, and if you did, did she come down?

Interrogatory No. 10. Do you have any letters of her's refusing to come down and live with you?

Interrogatory No. 11. Did you give her any just cause and legal excuse not to come down and live with you?

Interrogatory No. 12. Since she failed to come and live with you, as above stated, have you ever seen her?

Interrogatory No. 13. Where is your wife now living?

Complainant suggests that Mr. Richard D. Springle of Monticello Auto Company, 20th and Monticello Avenue, Norfolk, 10, Virginia, will be a suitable person to act as commissioner in this cause, he not being of counsel or kin to either of the parties to this action or their attorney.

Solicitor for Complainant

COMMISSION TO TAKE DEPOSITIONS B.T.-500-11-54

**THE STATE OF ALABAMA**
**Baldwin County**

**Circuit Court**

TO: Mr. Richard D. Sprinkle,
Monticello Auto Company,
20th and Monticello Avenue,
Norfolk, 10, Virginia

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Robert H. Wilmer

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Robert H. Wilmer, Complainant

and Constance Wilmer Respondent

on oath, to be by you administered, upon him to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 28th day of November, 195 5

Register.

Commissioner's Fee, $

Witness' Fees, $

| | | |
|---|---|---|
| ROBERT H. WILMER, COMPLAINANT, | I | IN THE CIRCUIT COURT OF |
| VS. | I | BALDWIN COUNTY, ALABAMA |
| CONSTANCE WILMER, RESPONDENT | I | IN EQUITY |

Comes your Complainant, ROBERT H. WILMER, by his attorney, and respectfully shows that he is now in Norfolk, Virginia and his address is 829 East 25th Street, Norfolk, Virginia and he desires to offer his testimony in the above mentioned cause as witness in his own behalf and files the following interrogatories so that his testimony may be reduced to writing and filed in this cause:

Interrogatory No. 1. State your name and age and your permanent residence.

Interrogatory No. 2. Do you regard Baldwin County, Alabama as your home?

Interrogatory No. 3. Have you taken up a permanent residence outside of Baldwin County, Alabama?

Interrogatory No. 4. What is your wife's name, where does she live and how old is she?

Interrogatory No. 5. When and where were you married?

Interrogatory No. 6. After you were married, how long did you and your wife live together?

Interrogatory No. 7. When did you and your wife separate?

Interrogatory No. 8. After you and your wife separated, did you get an apartment for her?

Interrogatory No. 9. Did you ask her to come down and live with you, and if you did, did she come down?

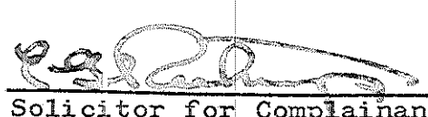
Interrogatory No. 10. Do you have any letters of her's refusing to come down and live with you?

Interrogatory No. 11. Did you give her any just cause and legal excuse not to come down and live with you?

Interrogatory No. 12. Since she failed to come and live with you, as above stated, have you ever seen her?

Interrogatory No. 13. Where is your wife now living?

Complainant suggests that Mr. Richard D. Springle of Monticello Auto Company, 20th and Monticello Avenue, Norfolk, 10, Virginia, will be a suitable person to act as commissioner in this cause, he not being of counsel or kin to either of the parties to this action or their attorney.



Solicitor for Complainant

**RECEIPT FOR**
**REGISTERED ARTICLE NO.** 58 Date 8-17-55

Value $ 5.00 Special delivery fee ¢

Fee $ 40 Return receipt fee 07 ¢

Surcharge $ Restricted delivery fee 30 ¢

Postage $ 03 ☐ Airmail

From Alice J. Duck clk
Box ala.
(Address)

Addressed to Constance Gulmer
12 Chelsea St Boston Mass
(Address) (Accepting employee)

BAY MINETTE AUG 17 1955 ALA.
POSTMARK

GPO c9—16—12666-8

35-82

INTERROGATORIES

ROBERT H. WILMER, COMPLAINANT

VS.

CONSTANCE WILMER, DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

FILED

NOV 28 1955

ALICE J. BUCK, Register

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

July 28, 1955

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Robert H. Wilmer
vs
Constance Wilmer
Our File: 3049

With this we are handing you waiver in the above case. Please file, and I am going ahead and take the testimony.

Yours very truly,

EGR/fm
Encl.

8-9-55

LAW OFFICES
RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

ELLIOTT G. RICKARBY

E. G. RICKARBY, JR.

November 22, 1955

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Wilmer vs. Wilmer
Our File: 3049

With this we are handing you interrogatories we have filed in the Wilmer case.

We have already taken a decree pro confesso, so I ask that you issue commission as requested in this to Mr. Richard D. Springle.

Yours very truly,

EGR/fm
Encl.

cc: Mr. Robt. H. Wilmer

Decree Pro Confesso of Publication. MPCO

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

No. _____ _____, Term, 19____

ROBERT H. WILMER
Complainant

Vs.

CONSTANCE WILMER
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 8 day of Sept., 1955, 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 6 day of Sept 1955 and _____

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

CONSTANCE WILMER

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

Constance Wilmer

This 28 day of Nov. 1955.

Alice J. Duck Register.

**NOTICE TO NON-RESIDENT**

The Baldwin Times, Bay Minette, Alabama

ROBERT H. WILMER,

Complainant

No.

vs.

CONSTANCE WILMER,

Defendant

The State of Alabama,

Baldwin County.

Circuit Court, in Equity

This the 31st day of August, 1955

In this cause it being made to appear to the Clerk of this Court by the affidavit of Complainant

that the Defendant CONSTANCE WILMER

is a non-resident of the State of Alabama

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 the Defendant the said CONSTANCE WILMER

to answer or demur to the Bill of Complaint in this cause by the 30th day of September 1955, or after thirty days therefrom a decree Pro Confesso may be taken against the said CONSTANCE WILMER.

Alice J. Duck

ALICE DUCK Register.

ROBERT H. WILMER
COMPLAINANT

VS.

CONSTANCE WILMER
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

STATE OF Virginia

Norfolk, COUNTY

A F F I D A V I T

Personally appeared before me the undersigned officer, authorized to administer oath of military personnel, ROBERT H. WILMER, a member of the Armed Force of the United States and complainant in the above styled cause, who being first duly sworn, deposes and says that:

Constance Wilmer the defendant in the above entitled cause, is a non-resident of the State of Alabama and that her residence and post office address is 12 Chelsea Street, Boston, Massachusetts, and that said defendant is in the belief of the affiant, over the age of twenty-one years.

Robert H. Wilmer
Affiant

Sworn to and subscribed to before me this the 18th day of July, 1955.

M. X. Feck
M. X. FECK, LTJG, USNR, Summary Court Officer*
Name and style of officer

*Authorized to administer oaths to members of the Armed Forces on Active Duty in accordance with Article 136 of the Uniform Code of Military Justice.

LAW OFFICES
ELLIOTT G. RICKARBY
RICKARBY & RICKARBY
FAIRHOPE, ALABAMA
E. G. RICKARBY, JR.

July 26, 1955

Mrs. Alice Duck
Clerk of the Circuit Court
Baldwin County
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Wilmer vs. Wilmer
Our File: 3049

Please issue both publication and registered mail against this defendant.

Enclosed is our check for $25.00 to cover costs. If this is not enough, please advise.

Yours very truly,

EGR/fm
Encl.
8-4-55

cc: Mr. Robert H. Wilmer

Telephone not to publication - Send. 8-11-55

TY FAULKNER
PUBLISHER

ICE TO NON-RESIDENT
State of Alabama,
dwin County.
uit Court, in Equity this the
ay of August, 1955.
BERT H. WILMER, Com-
nt, vs. CONSTANCE WIL-
Defendant.
this cause it being made
ear to the Clerk of this
by the affidavit of Com-
nt that the Defendant, Con-
Wilmer, is a non-resident
State of Alabama and fur-
hat, in the belief of said Af-
he Defendant is over the
21 years; it is, therefore,
d that publication be made
Baldwin Times, a news-
published in Bay Minette,
in County, Alabama, once
ek for four consecutive
requiring the Defendant
d Constance Wilmer to an-
r demur to the Bill of Com-
in this cause by the 30th
September, 1955, or after
days therefrom a decree
onfesso may be taken
the said Constance Wil-

ALICE J. DUCK,
Register.
RBY & RICKARBY,
ors for Complainant. 34-4tc

THE BALDWIN TIMES
BALDWIN COUNTY
Alabama's Best County's Best Newspaper
BAY MINETTE, ALABAMA -3580

# AFFIDAVIT OF PUBLICATION

**STATE OF ALABAMA,**
**BALDWIN COUNTY.**

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

Robert H. Wilmer vs.
Constance Wilmer

**COST STATEMENT**

172 WORDS @ 6½ cents $ 11.18

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

E. R. Morrissette Jr.
Editor ~~Publisher~~.

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

Date of 1st publication Sept 8, 1955 Vol. 66 No. 34

Date of 2nd publication Sept 15, 1955 Vol. 66 No. 35

Date of 3rd publication Sept 22, 1955 Vol. 66 No. 36

Date of 4th publication Sept 29, 1955 Vol. 66 No. 37

Subscribed and sworn before the undersigned this 29 day of Sept, 1955

Dorothy Martin
Notary Public, Baldwin County.

E. R. Morrissette Jr.
Editor ~~Publisher~~.

| | | |
|---|---|---|
| ROBERT H. WILMER | ) | IN THE CIRCUIT COURT OF |
| COMPLAINANT | ) | BALDWIN COUNTY, ALABAMA |
| VS. | ) | |
| | ) | IN EQUITY |
| CONSTANCE WILMER | ) | |
| DEFENDANT | ) | |

Comes the Complainant in the above entitled cause and shows to this Honorable Court that publication has been made against the defendant, CONSTANCE WILMER, requiring her to plead, answeror demur to the Bill by the 30th of October, 1955, and that as shown by Proof of Publication on file in this cause, and that the said defendant has not so answered, therefore, Complainant moves that a Decree Pro Confesso be entered against the defendant, Constance Wilmer.

Solicitor for Complainant

LAW OFFICES
RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

ELLIOTT G. RICKARBY

E. G. RICKARBY, JR.

August 31, 1955

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

Inre: Wilmer vs. Wilmer
Our File: 3049

Talked to Mr. Wilmer and, as you have not sent the ad to the Fairhope paper, please send it to the Bay Minette Times.

Yours very truly,

EGR/fm

ROBERT H. WILMER, COMPLAINANT

VS.

CONSTANCE WILMER, DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

The State of Alabama
Baldwin County } Circuit Court Equity

To Constance Wilmer

12 Chelsea Street,

Boston, Mass

You are hereby commanded to appear and plead, answer or demur, within thirty days from the service hereof, as provided by an Act of the Legislature of Alabama, approved September 25th, 1919, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, against you, Defendant....., by Robert H. Wilmer ..... Complainant.....

A copy of which Bill of Complaint is hereto attached.

Witness by hand, this 16th day of August 1955

Register

| | |
|---|---|
| ROBERT H. WILMER<br>COMPLAINANT<br>VS<br>CONSTANCE WILMER<br>DEFENDANT | IN THE CIRCUIT COURT OF<br>BALDWIN COUNTY, ALABAMA<br>IN EQUITY |

ORIGINAL BILL

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT:

Your complainant, Robert H. Wilmer, represents and shows unto your Honor as follows:

1. That he is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama, and has been such for three years next preceding the filing of this his bill of complaint, and is now serving in the armed forces of the United States.

2. That Constance Wilmer, the defendant, is over the age of twenty-one years and is a resident of Boston, Massachusetts.

3. That your complainant and respondent were lawfully married in Boston, Massachusetts, on the 22nd day of May, 1953, and lived together as husband and wife until she abandoned him as hereinafter set forth.

4. Complainant further avers that said respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, since which time complainant and respondent have not lived together nor in any way recognized each other as husband and wife.

The Premises Considered, your complainant makes the said Constance Wilmer a party respondent to this Bill of Complaint, and in order that the complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to issue, directed to the said Constance Wilmer, commanding her to answer, plead or demur to this Bill of Complaint within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, granting the complainant the right to remarry; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper.

RICKARBY AND RICKARBY

BY _____

E. G. Rickarby, Jr.
Solicitor for Complainant

ROBERT H. WILMER

COMPLAINANT

vs

CONSTANCE WILMER

DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ORIGINAL BILL

FILED
JUL 12 1955
ALICE J. BUCK, Register

J. DUCK, Circuit Clerk

Owin County

MINETTE. ALA.



RETURN RECEIPT REQUESTED

Deliver to Addressee Only

st ered

Delivery Only To Person
hom Addressed

rn Receipt Requested

Constance Wilmer,
12 Chelsea Street,
Boston, Massachusette

REGISTERED
NO. 58

BAY MINETTE ALA. AUG 17 1955

BAY MINETTE ALA. AUG 22 1955

BOSTON, MASS. REGISTRY SECTION AUG 20 1955

BAY MINETTE ALA. AUG 17 1955

BOSTON, MASS. AUG 22 1955 EAST BOSTON