

3631

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons ELLA BOLAR to appear and plead, answer or demur within thirty days from the service hereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Robert Bolar as Complainant and against Ella Bolar, as Respondent.

WITNESS my hand this the 13 day of October, 1955.

Alfred J. Smith
Register

ROBERT BOLAR
COMPLAINANT
VS
ELLA BOLAR
RESPONDENTS

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

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

Your Complainant, Robert Bolar, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident citizen of Baldwin County, Alabama, and has been for two years next preceding the filing of this bill of Complaint, and over twenty-one years of age; that the Respondent is over twenty-one years of age, and a resident of Ensley, Jefferson County, Alabama.

2.

That your Complainant and the Respondent married at Birmingham, Alabama, on to-wit, January 20, 1941, and lived together as husband and wife until on to-wit, September 20, 1946.

3.

That on to-wit, September 20, 1946, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

There has been no children born to this union; the Complainant and the Respondent own no joint property to be divided in this proceeding.

WHEREFORE, the premises considered, Your Complainant prays that Your Honor will by proper process make the said Ella Bolar 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.

~~Your Complainant further prays that upon a final hearing hereof, Your~~
Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY:

Albert M Brantley
Solicitor for the Complainant

Received to
this 13 day of Oct 1955
TAYLOR WILKINS, Sheriff

OCT 20 1955

EXECUTED this the _____

day of _____ 1955

by leaving a copy of this within with

Ella Bolan

HOLT A. McDOWELL, Sheriff
Jefferson County, Alabama

by Mr Jones

The Sheriff claims 12
miles at 10c per mile for a total of

\$ 1.20

HOLT A. McDOWELL, Sheriff

ROBERT BOLAR

COMPLAINANT

VS

ELLA BOLAR

RESPONDENT

SUBPOENS AND COMPLAINT

FILED

OCT 18 1955

ALICE J. BUCK, Register

Baldwin Clk
3631

AM Thurs

OK

1711 21st

OCT 18 1955

J