

GORDON & GORDON

ATTORNEYS AT LAW

1607-1610 MERCHANTS NATIONAL BANK BUILDING

MOBILE II, ALABAMA

ROBT. E. GORDON
A. FLETCHER GORDON

September 10, 1951

2714

Clerk, Circuit Court
Bay Minette, Alabama

Dear Sir:

We herewith hand you a Bill of Complaint seeking a divorce, and we would appreciate your giving it to the Clerk on the Equity side, and get publication subpoenaing the Respondent. We will guarantee the costs of such a publication.

Thanking you in advance for your kindness, and asking that you sign and return the enclosed card so that we may have something on our files showing that it is properly filed, we are

Very respectfully yours,

GORDON & GORDON

BY:

Robt E Gordon

REG/pjb

Encl. 3
Bill of Complaint
Copy of Bill
Card to be signed by Clerk

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

James Bolden

No. 2714

The State of Alabama,

Baldwin County.

vs.

Frances Bolden

Circuit Court, in Equity

This the 11th day of

Sept, 1957

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

James Bolden

that the Defendant Frances Bolden

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper pub-

lished in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

Frances Bolden the said Defendant

to answer or demur to the Bill of Complaint in this cause by the 11th day of

Oct 1957 or after thirty days therefrom a decree Pro Confesso may be

taken against her

Henry J. Gordon
Register.

Gordon & Gordon
Attorneys

JAMES BOLDEN,)	
	(IN THE CIRCUIT COURT OF
Complainant,)	
	(BALDWIN COUNTY, ALABAMA,
-vs-)	
	(IN EQUITY.
FRANCES BOLDEN,)	
	(
Respondent.)	

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF
THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Now comes your Complainant, James Bolden, and files this his Bill of Complaint against Frances Bolden, Respondent, and shows unto your Honor and to the Court as follows:

F I R S T

That the Complainant is a bona fide resident of Baldwin County, State of Alabama, and has been such resident for a period of more than one year next prior to the filing of this Bill of Complaint and that he is over the age of twenty-one years. That the said Frances Bolden is over the age of twenty-one years and is a resident of Pensacola, Florida, and that she resides at 307 East Leonard Street in Pensacola, Florida, being a non-resident of the State of Alabama.

S E C O N D

That the Complainant and Respondent, Frances Bolden, were lawfully married at Fairhope on February 18, 1941, and they lived together as man and wife for some time thereafter. That the Respondent, Frances Bolden, did voluntarily abandon the bed and board of the Complainant, James Bolden, more than one year next prior to the filing of this Bill of Complaint, and since which time, they have not lived together in any manner whatsoever, and that the Respondent had no just cause or legal excuse for so abandoning him.

PRAYER FOR PROCESS

WHEREFORE, your Complainant, James Bolden, prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and will cause notice to be served and had upon the said Frances Bolden in accordance with the rules of this Honorable Court and the laws in such matters providing, making her a party Respondent hereto and requiring her to answer, plead or demur to this Bill of Complaint within the time allowed by law.

PRAYER FOR RELIEF

Your Complainant, James Bolden, further prays that upon the hearing of this cause, your Honor will grant him an absolute divorce, dissolving the bonds of matrimony now existing between the said Frances Bolden and the Complainant, giving him the right to marry again, and such other and further relief as he may be entitled to, the premises considered.

OF GORDON & GORDON
SOLICITORS FOR COMPLAINANT

James Bolden
COMPLAINANT

STATE OF ALABAMA §
COUNTY OF MOBILE §

Personally appeared before me, W. H. L. Landon,
a Notary Public, in and for said State and County, James Bolden, who is known to me, and who after having been by me first duly sworn, deposes and says that he is informed and believed and upon such information and belief states that said Respondent, Frances Bolden, is a non-resident of the State of Alabama, that her address is 307 East Lenord Street, Pensacola, Florida, and that said Respondent, Frances Bolden, is over the age of twenty-one years.

James Bolden

Subscribed and sworn to before me on
this the 10th day of September, 1951.

W. H. L. Landon
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

W 2714

James Bolden

vs.

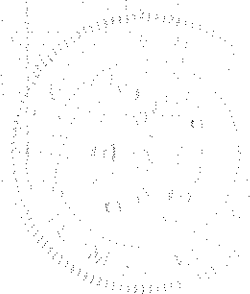
Frances Bolden

Bill of Complaint

FILED

SEP 11 1951

ALICE J. DUCK, Clerk



ALABAMA'S BEST COUNTY'S-

BAY MINETTE, ALABAMA

BEST NEWSPAPER

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

Jimmy Faulkner, being duly sworn, deposes and says
that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper pub-
lished at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

James Bolden vs.

Frances Bolden

LEGAL NOTICE

NOTICE TO NON-RESIDENT
THE STATE OF ALABAMA, BALDWIN
COUNTY.
CIRCUIT COURT, in Equity
JAMES BOLDEN, NO. 2714
vs.
FRANCES BOLDEN

This the 11th day of September, 1951
In this cause it being made to appear
to the Clerk of this Court by the af-
fidavit of James Bolden that the De-
fendant Frances Bolden 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 news-
paper published in Bay Minette, Bald-
win County, Alabama, once a week
for four consecutive weeks, requiring
Frances Bolden, the said Defendant, to
answer or demur to the Bill of Com-
plaint in this cause by the 11th day
thereof or October 1951, or after thirty days
therefrom a decree Pro Confesso may
be taken against her.

ALICE J. DUCK

Register

GORDON & GORDON
Attorneys For Complainant

34-4tc

COST STATEMENT

156 WORDS @ 6 1/2 cents --- \$ 10 16

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

Jimmy Faulkner
Publisher.

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

Date of 1st publication Sept. 13, 1951 Vol. 62 No. 34

Date of 2nd publication Sept. 20, 1951 Vol. 62 No. 35

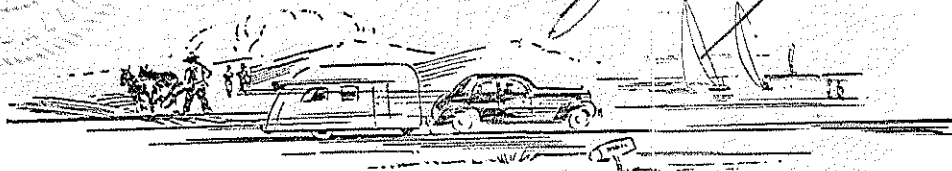
Date of 3rd publication Sept. 27, 1951 Vol. 62 No. 36

Date of 4th publication Oct. 4, 1951 Vol. 62 No. 37

Subscribed and sworn before the undersigned this 4 day of Oct, 1951.

Dorothy Martin
Notary Public, Baldwin County.

Jimmy Faulkner
Publisher.



2714
RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1

Frances Beld

(Signature or name of addressee)

2

Deliver to Addressee Only

(Signature of addressee's agent—Agent should enter addressee's name or line ONE above)

Date of delivery _____, 19____

FILED
SEP 17 1941
OFFICE 1. REC, REGISTER

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300
(GPO)

POSTMARK OF DELIVERING
OFFICE

Return to Wm. J. Smith
(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE

No. 739

Post Office

Hay Market, Ala.

INSURED PARCEL

No. _____

16-12421

State

