

SUMMONS AND COMPLAINT

2230

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY
No. 2230

-----TERM, 194-----

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon

Lucille Paige

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Lucille Paige

, Defendant....

by

Luther Paige Jr.

, Plaintiff....

Witness my hand this

29th

day of

January

194*9*

Heinz L. Luck

, Clerk.

LUTHER PAIGE, JR.,
Complainant,
-vs-
LUCILLE PAIGE,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, Sitting in Equity;

Your complainant, Luther Paige, Jr., respectfully
represents and shows unto your Honor

1. That complainant is over the age of twenty-one
years and is a resident of said State and County, and has been a
bona fide resident of said State for more than twenty years next
preceding the filing of this bill of complaint; that Lucille Paige
is over the age of twenty-one years and is a non-resident of the
State of Alabama, her last known post office address being 1321
North Davis Street, Pensacola, Florida.

2. That your complainant and respondent were lawfully
married on or about, to-wit, September 13, 1943.

3. Complainant further avers that said respondent vol-
untarily 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.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: your complainant prays that
Lucille Paige be made a party defendant to this cause by the usual
process of this Honorable Court requiring her to plead, answer or
demur within the time and under the penalties prescribed by the
rules of this Court and the statutes in such cases made and pro-
vided; that service be had upon the respondent by registered mail
with return receipt requested as provided by the statutes and rules
of this Court; that upon a final hearing of this cause, that your
complainant be granted a divorce from said respondent. Should your
complainant be mistaken in the relief prayed for, that there be
granted to her such other, different and general relief to which she
may be entitled and as in duty bound she will ever pray.


Attorney for Complainant

may be omitted and as in such bond she will ever stay.

Stated to her such other, the present and General relief to which she complains be mistaken in the relief prayed for, that there be complaint be granted a divorce from said respondent. Should your of this Court; that upon a final hearing of this cause, that your with return receive redressed as provided by the statutes and rules aided; that service be had upon the respondent by registered mail wife of this Court and the as before in such cases made and pro- given, within the time and under the penalties prescribed by the process of this Honorable Court redressing her to pray, answer or Lucille Paige be made a party defendant to this cause by the name

THE PETITIONERS COME DEMAND: your complaint prays that
BEYOND FOR A PROCESS TWO DOLLARS

in any way recognized each other as husband and wife, which crime complaint and the content have not lived together nor one year next preceding the filing of this bill of complaint, since unlawfully abandoned the bed and board of complaint for more than

3. Complaint is proper where that said respondent not

entered on or about December 13, 1943

that your complaint and respondent were lawfully

North Duke Street, Birmingham, Alabama

State of Alabama for 1944

the last day of January, 1944

being the filing of this bill of complaint

point the residence of said respondent

years and his residence at Birmingham, Alabama

respondent and your complaint

LUTHER PAIGE, JR.,
Complainant,
-VS-
LUCILLE PAIGE,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED
JAN 27 1949
ALICE J. DUCK, Register

COURT OF BALDWIN COUNTY, ALABAMA
TO THE HONORABLE JUDGE OF THE CIRCUIT

Respondent

LUCILLE PAIGE

As

Complainant

LUTHER PAIGE, JR.

BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Cecil G. Chason, a Notary Public in and for said County in said State, personally appeared Luther Paige, Jr., who after being by me first duly and legally sworn, deposes and says under oath as follows:

That his name is Luther Paige, Jr.; that he is over the age of twenty-one years and a bona fide resident of Foley, Baldwin County, Alabama, having been a resident of Baldwin County for more than twenty years; that on September 13th, 1943, he married Lucille Paige; that more than one (1) year ago Lucille Paige voluntarily abandoned the affiant; that she is not a resident of the State of Alabama; that her last known address was 1321 North Davis Street, Pensacola, Florida; that she has moved from that address and that her place of residence or post office address is not known to affiant nor can it be ascertained by affiant who has made inquiry as to her present residence and post office address; that affiant believes the said Lucille Paige to have no intention of returning to the State of Alabama.

Luther J. Paige Jr.
Affiant

Sworn to and subscribed before me,
a Notary Public, on this the 18th
day of February, 1949.

Cecil G. Chason
Notary Public, Baldwin County
State of Alabama

LUTHER PAIGE, JR.,

Complainant,

-vs-

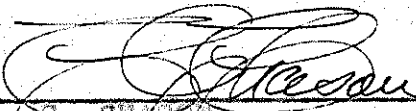
LUCILLE PAIGE,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

In this cause it being made to appear to the Clerk of this Court by the affidavit of Luther Paige, Jr., the complainant, that the defendant, Lucille Paige, is a non-resident of the State of Alabama and that her post office address is unknown and cannot be ascertained; it being further shown by said affidavit that the defendant is over the age of twenty-one years; it is therefore ordered, that publication be made in the Foley Onlooker, a newspaper published in Foley, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Lucille Paige to plead, answer or demur to the bill of complaint filed in this cause by the 7th day of April, 1949, or after thirty days thereafter a decree pro confesso may be taken against her.


C. G. CHASON,
Attorney for Complainant.

Alice J. Duck, Register

LUTHER PAIGE, JR.,

Complainant,

-VS-

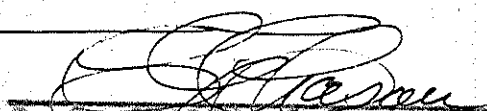
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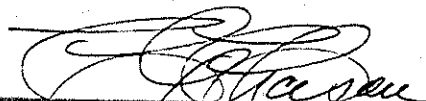
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IN THE CIRCUIT COURT OF
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IN EQUITY

MOTION FOR SERVICE ON NON-RESIDENT DEFENDANT BY PUBLICATION

Comes the complainant in the above entitled cause and shows unto this Honorable Court that affidavit has been made as required by law showing the respondent to be a non-resident of the State of Alabama and showing her place of residence to be unknown, wherefore, motion is hereby made and complainant prays that the Court will make and enter an order of publication authorizing and directing service upon said non-resident defendant through publication once a week for four consecutive weeks in the Foley Onlooker, a newspaper published in Baldwin County, Alabama, and shall order a copy of said notice to be posted at the door of the Courthouse of Baldwin County, Alabama, all as provided by law in such cases.

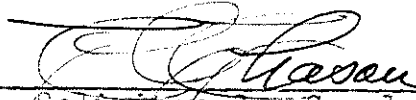

Solicitor for Complainant

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