STATE OF ALABAMA DE BALDWIN COUNTY DE DE LA COUNTY DE LA



TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon PARALEE EARL, 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 EDDIE EARL, as Complainant and against PARALEE EARL, as Respondent.

WITNESS my hand this 23md day of March, 1949.

EDDIE EARL IN THE CIRCUIT COURT OF

COMPLAINANT IN BALDWIN COUNTY, ALABAMA

VS. IN EQUITY

PARALEE EARL IN RESPONDENT

TO HON. TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

Your Complainant Eddie Earl, respectfully represents and shows unto your Honor and this Honorable Court as follows:

l.

That your Complainant is over twenty-one years of age, and a bona fide resident of baldwin County, Alabama; that the Respondent is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama, however, presently residing at 650 Ceder Street, Mcbile, Alabama.

2.

That your Complainant and the Respondent married in Baldwin County, Alabama, on July 10th, 1946, and lived together ashusband and wife, in Baldwin County, Alabama, until January 1948.

3.

That in January 1948, and while the Complainant and the Respondent were living at Stockton, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant, and has remained away voluntarily and continously since that time.

WHEREFORE the premises considered your Complainant prays that your Honor will by proper process make the said Paralee Earl 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 Honor-able Court.

Complainant further grays that upon a final hearin hereof your Honor will make and enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that he be granted such other, further different or general relief as he may be in equity and good conscience entitled to receive.

Solicitor for Complainant

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Received in Sheriff's Office this 24 day of March, 1949 TAYLOR WILKINS, Sheriff

SUMMONS AND COMPLAINT

EDDIE EARL

COMPLAINANT

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PARALEE EARL

RESPONDENT

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Baldwin Times Print

EDDIE EARL			_ Complainant
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