

STATE OF ALABAMA
BALDWIN COUNTY

2256

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 23rd day of March, 1949.

Alice J. Duck
Register

EDDIE EARL	§	IN THE CIRCUIT COURT OF
COMPLAINANT	§	BALDWIN COUNTY, ALABAMA
VS.	§	IN EQUITY
PARALEE EARL	§	
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:

1.

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 Cedar Street, Mobile, Alabama.

2.

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

3.

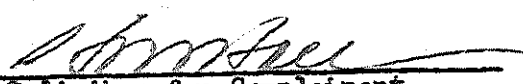
That in January 1948, and while the Complainant and the Respondent were living at Stockton, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant, and has remained away voluntarily and continuously since that time.

4.

That the Complainant and the Respondent have no children.

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 Honorable Court.

Complainant further prays 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

445
172
NO 2856
RECORDED

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

SUMMONS AND COMPLAINT

EDDIE EARL
COMPLAINANT
VS.
PARALEE EARL
RESPONDENT

FILED
MAR 23rd 1949
ALICE J. WOOD, Register

650 cedar st
mobile

26 1
29 4
DAY OF March 1949
I SERVED A COPY OF THIS SUMMONS
ON EDDIE EARL
BY SERVICE ON
BY J. H. WILKINS, Sheriff

CIRCUIT COURT COMPLAINT

2256

Printed By Baldwin Times, Bay Minette, Ala.

EDDIE EARL

Complainant,

Vs.

PARALEE EARL

Respondent.

In the Circuit Court.

In Equity No. 2256

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent

PARALEE EARL

by the Sheriff of Baldwin County, on the 29th day of March,
1949.

And it further appears to the Register, that the said PARALEE EARL

_____, the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,

on motion of H. M. Hall Solicitors

for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,

and it hereby is, in all things taken as confessed against the said PARALEE EARL

This 31 day of May, 1949.


Register.

No. 2256

**CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY**

EDDIE EARL

Complainant,

Vs.

PARALEE EARL

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 31st day of May,
1949.

Beauford H. H. H.
Register.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

No. 2256 Circuit Court, In Equity.

EDDIE EARL

Complainant

Vs.

PARALEE EARL

Defendant

Motion is hereby made for a Decree Pro Confesso against PARALEE EARL

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 28 day of May 1949

H. M. Hall Solicitor.

No. _____ Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

EDDIE EARL

Vs.

PARALEE EARL

Motion for Decree Pro Confesso on
Personal Service

Filed 5-28 1949

Wesley J. Duck
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

No. _____ Circuit Court, In Equity.

EDDIE EARL

Complainant

Vs.

PARALEE EARL

Defendant


Motion is hereby made for a Decree Pro Confesso against

PARALEE EARL

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 9 day of May 1949


Solicitor.

No. _____ Page _____

**The State of Alabama,
BALDWIN COUNTY**

CIRCUIT COURT, IN EQUITY

EDDIE EARL

Vs.

PARALEE EARL

**Motion for Decree Pro Confesso on
Personal Service**

Filed _____ 19 _____

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

The State of Alabama,
Baldwin County.

No. _____ CIRCUIT COURT, IN EQUITY

Eddie Earl Complainant

vs.

Paralee Earl Defendant

In this cause it appears to the complainant
that a Summons requiring the Defendant Paralee Earl

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said

Summons upon Paralee Earl

was served upon her by the Sheriff of Mobile County, Alabama, on the
29th day of March 1949.

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date,
it is now, therefore, on motion of J. M. Hall

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed
against the said Paralee Earl

Defendant aforesaid.

This 9th day of May 1949

W. J. Welch
Register.