

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2388

TERM, 1949

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon OUIDA HOLLADAY

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

OUIDA HOLLADAY

, Defendant

by ALGIN G. HOLLADAY

, Plaintiff

Witness my hand this 5th day of Nov 1949

Alvin L. Reuck, Clerk

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

ALGIA G. HOLLADAY

Plaintiffs

vs.

QUIDA HOLLADAY

Defendants

SUMMONS and COMPLAINT

Filed 8th Nov. 19 49

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19

, Sheriff

I have executed this summons

this, 19

by leaving a copy with

Sheriff

Deputy Sheriff

ALGIA G. HOLLADAY,

Complainant,

-vs-

OUIDA HOLLADAY,

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, Algia G. Holladay, respectfully represents and shows unto your Honor:-

1. That complainant is over the age of twenty-one years and is a resident of said County and State, and has been a bona fide resident of said State for more than one year next preceding the filing of this Bill of Complaint; that Ouida Holladay is over the age of twenty-one years and is a resident of Foley, Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, two-wit, October 16, 1948.

3. Complainant further avers and alleges that said respondent has been guilty of adultery with person or persons whose names to your complainant are unknown.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED:- Your complainant prays that Ouida Holladay 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 provided; 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 him such other, different and general relief to which he may be entitled and as in duty bound, he will ever/ pray.

Algia G. Holladay
Complainant

T. J. Mashburn
Solicitor for Complainant