

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons LESLIE NEWBERRY, 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 Nicie Newberry, as Complainant and against Leslie Newberry, as Respondent.

WITNESS my hand this the 29th day of August, 1950.

Wm. J. H. H. H.
Register

NICIE NEWBERRY
COMPLAINANT
VS
LESLIE NEWBERRY
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

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

Your Complainant, Nicie Newberry, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age; that she has been a resident of Alabama for more than three years next preceding the filing of this bill of complaint; that the Respondent is over twenty-one years of age and a nonresident of the State of Alabama; that he was last heard from in Arizona; that a diligent search and inquiry has been made to ascertain his address, but it is unknown.

2.

That your Complainant and the Respondent married in Escambia County, Alabama, in April 1947, and lived together as husband and wife in Alabama until on August 19, 1948.

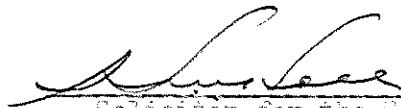
3.

That on August 19, 1948, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

That there was born to the marriage between your Complainant and the Respondent, one child, Elaine Newberry, two years old in January, 1950; that the Respondent is not a suitable, fit or proper person to have the care and control of the said child; that your Complainant, the mother of said child, is a proper and suitable person to have her care, custody and control.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Leslie Newberry, party Respondent to this cause of action, requiring him 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 hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to her the custody, care and control of the minor child, Elaine Newberry; that she be granted such other, further and different or general relief as she may be in equity and good conscience entitled to receive.



Solicitor for the Complainant

RECORDED

2536

REICIE NEWBERRY

COMPLAINANT

VS

IRESLIE NEWBERRY

RESPONDENT

SUMMONS AND COMPLAINT

FILED

AUG 23 1950

ALICE J. DICK, Register

NICIE NEWBERRY
COMPLAINANT
VS
LESLIE NEWBERRY
RESPONDENT

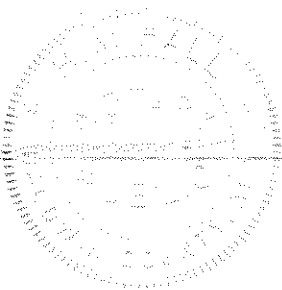
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

The Complainant, Nicie Newberry, being first duly sworn, deposes and says that she is over twenty-one years of age and lives at Loxley in Baldwin County, Alabama; that she has been a resident of Alabama all of her life; that the Respondent, Leslie Newberry, is over twenty-one years of age and a non-resident of the State of Alabama; that his last known address was Phoenix, Arizona; that she has made a diligent search and inquiry to ascertain his present address, but it is unknown.

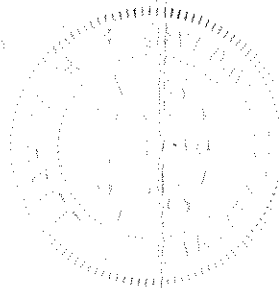
Nicie Newberry

Sworn to and subscribed before me on this the 11 day of August, 1950.

[Signature]
Notary Public, Baldwin County Alabama



257350
RECORDED



NICOLE NEWBERRY

COMPLAINANT

VS.

LESLIE NEWBERRY

RESPONDENT

AFFIDAVIT OF NON-RESIDENT

FILED
AUG 29 1950
ALICE J. DUCK, Register

The **BALDWIN**
Times
ALABAMA'S BEST COUNTY'S- BEST NEWSPAPER
BAY MINETTE, ALABAMA

NOTICE TO NON-RESIDENT
NICIE NEWBERRY, No. 2536
vs.
LESLIE NEWBERRY
The State of Alabama, Baldwin County.

Circuit Court in Equity — This the 29th day of August, 1950.
In this cause it being made to appear to the Clerk of this Court by the affidavit of Nicie Newberry, that the Defendant Leslie Newberry, 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 newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Respondent, the said Leslie Newberry, to answer or demur to the Bill of Complaint in this cause by the 29th day of September, 1950, or after thirty days therefrom a decree Pro Confesso may be taken against him.
ALICE J. DUCK, Register
H. M. Hall, Attorney. 32-4tc

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 published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Nicie Newberry vs. Leslie
Newberry

COST STATEMENT

152 WORDS @ 4 1/2 cents — — — \$ 6 84

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 Aug. 31, 1940 Vol. 61 No. 32

Date of 2nd publication Sept 7, 1940 Vol. 61 No. 33

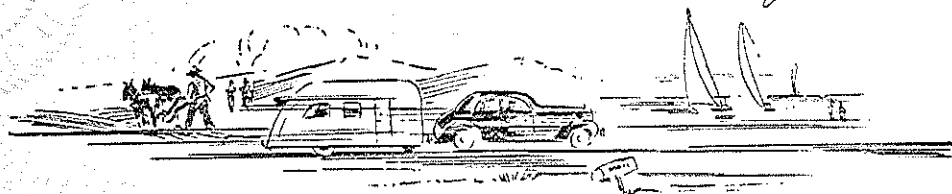
Date of 3rd publication Sept 14, 1940 Vol. 61 No. 34

Date of 4th publication Sept 21, 1940 Vol. 61 No. 35

Subscribed and sworn before the undersigned this 21 day of Sept, 1940

Deborah Martin
Notary Public, Baldwin County.

Jimmy Faulkner
Publisher.



NOTICE TO NON-RESIDENT

TIMES PRINTING CO., BAY MINETTE

NICIE NEWBERRY

No. 2536

VS.

LESLIE NEWBERRY

The State of Alabama,

County.

Circuit Court, in Equity

This the 29th day of

August _____, 194⁵⁰

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

that the Defendant LESLIE NEWBERRY

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 newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Respondent the said Lislle Newberry

to answer or demur to the Bill of Complaint in this cause by the 29th _____ day of September 1945, or after thirty days therefrom a decree Pro Confesso may be taken against him.

Register.