

2579

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT - IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Dorothy Nell, 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 James Nell, as Complainant, against Dorothy Nell, as Respondent.

Witness my hand this 2nd day of December, 1950.

Henry J. Warrick
Register.

JAMES NELL,

Complainant,

vs.

DOROTHY NELL,

Respondent.

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

Comes your Complainant, James Nell, and files this his Bill of Complaint for Divorce against Dorothy Nell, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are both resident citizens of Baldwin County, Alabama, residing near Bay Minette, Alabama. Your Complainant was born in the State of Alabama and has lived in this State all of his life except for an absence of about two years about ten years ago. The Respondent has been a resident citizen of Baldwin County, Alabama, all of her life. That your Complainant is over the age of twenty-one years and the Respondent is a married woman eighteen years of age.

SECOND:

That your Complainant and Respondent were married on January 2, 1950, and they have lived together as man and wife since that time until about November 4, 1950, when your Complainant was compelled to leave your Respondent and live separate and apart from her on account of the matters hereinafter complained of.

THIRD:

That at about the time of the separation above set out your Complainant found the Respondent and one Norman Harville in an automobile in the night parked on a lonely road and when your Complainant called to the Respondent the car drove away and in a few minutes Norman Harville brought the Respondent home. Your Complainant has found the Respondent in his home on several occasions with Norman Harville. Your Complainant has just learned that the Respondent committed the act of adultery about November 22, 1950, with the said Norman Harville.

FOURTH:

That Complainant and the Respondent do not have any children of their own. The Respondent was about four months pregnant at the time your Complainant married her but such child was not the child of your Respondent.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Dorothy Nell be made a party defendant to this cause by the usual writ or process of this Honorable Court requiring her to appear and 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 Honor will grant unto your Complainant an absolute divorce from said Respondent; that your Honor will also decree that Complainant be allowed to remarry if he sees fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.

James Nell
Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, John Chason, a Notary Public, in and for said State and County, personally appeared James Nell, who after being by me first duly and legally sworn, says:

That the allegations contained in the foregoing Bill of Complaint are true.

Sworn to and subscribed before
me, this 2nd day of December, 1950.

John Chason
Notary Public, Baldwin County,
Alabama.