

2743

You are hereby commanded to summons EDWARD X. RHONE, 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 RUTH S. RHONE as Complainant and against EDWARD X. RHONE, as Respondent.

Register.

O
Q
R
S
T
U
V
W
X
Y

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

Your Complainant, Ruth S. Rhone, respectfully represents unto
Your Honor and this Honorable Court as follows:

14

That your Complainant is a bona fide resident of Baldwin County, Alabama, and is over the age of twenty-one; that the Respondent is a bona fide resident of Baldwin County, Alabama, and over the age of twenty-one.

2.

That your Complainant and the Respondent married at Pascagoula, Mississippi, on April 26, 1937, and lived together as husband and wife in Baldwin County, Alabama until May 2, 1949.

3.

The Complainant further shows unto the Court that she has lived separate and apart from the bed and board of Edward I. Rhone, her said husband, for two years and without support from him for two years next preceding the filing of this bill and during said period she has been a bona fide resident in the State.

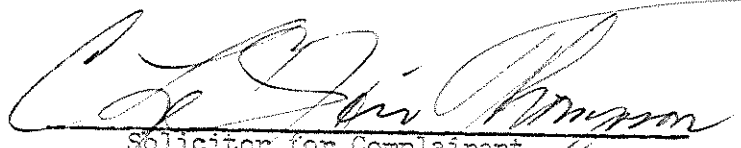
4.

That the parties to this cause adopted a child, Xenophone Lamar Rhone, now age six; That your Complainant is the suitable, fit and proper person to have the care, custody and control of said child.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Edward X. Rhone party Respondent to this bill of complaint 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; that this court will order a reference to determine a reasonable amount to be paid by the Respondent to your Complainant as alimony pendente lite.

Your Complainant further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between your Complainant and Respondent.

That the care, custody and control of the child be awarded to the Complainant, and that upon a final hearing of this cause, that your Complainant be awarded as maintenance for the child named herein the sum of Fifty (\$50.00) Dollars per month, and your Complainant prays for such other further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for Complainant.

Received in Sheriff's Office
this 15 day of Nov, 1951
TAYLOR WILKINS, Sheriff

RECEIVED 12.18.51
RETURNED 1.22.52
Not found in my County after diligent search
and inquiry.
W. H. HOLCOMBE, Sheriff
By R. L. K... D.S.

RECEIVED 11-21-51
RETURNED 11-29-51
Not found in my County after diligent search
and inquiry.
W. H. HOLCOMBE, Sheriff
By R. L. K... D.S.

RECEIVED 3-3-52
RETURNED 3-21-52
Not found in my County after diligent search
and inquiry.
W. H. HOLCOMBE, Sheriff
By R. L. K... D.S.

BE
OLD
225
42
RUTH S. RHONE

COMPLAINANT

VS

EDWARD X. RHONE

RESPONDENT

SUBPOENS AND COMPLAINT

FILED
NOV 15 1951

ALICE J. DUCK, Register

From the law offices of
C. LeNoir Thompson
Bay Minette, Alabama

258 North Washington Avenue
Mobile, Alabama
356 N. Ann St.
Mobile, Ala

no. 2743
450

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons EDWARD X. RHONE, 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 RUTH S. RHONE as Complainant and against EDWARD X. RHONE, as Respondent.

WITNESS my hand this the 15th day of Nov, 1951.

David J. Luck
Register.

RUTH S. RHONE

COMPLAINANT

VS

EDWARD X. RHONE

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

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

Your Complainant, Ruth S. Rhone, 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 is over the age of twenty-one; that the Respondent is a bona fide resident of Baldwin County, Alabama, and over the age of twenty-one.

2.

That your Complainant and the Respondent married at Pascagoula, Mississippi, on April 26, 1937, and lived together as husband and wife in Baldwin County, Alabama until May 2, 1949.

3.

The Complainant further shows unto the Court that she has lived separate and apart from the bed and board of Edward X. Rhone, her said husband, for two years and without support from him for two years next preceding the filing of this bill and during said period she has been a bona fide resident in the State.

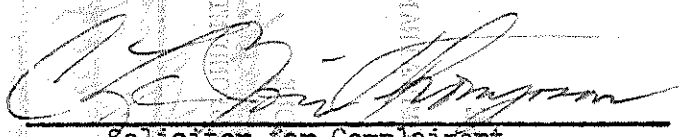
4.

That the parties to this cause adopted a child, Xenophone Lamar Rhone, now age six; That your Complainant is the suitable, fit and proper person to have the care, custody and control of said child.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Edward X. Rhone party Respondent to this bill of complaint 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; that this court will order a reference to determine a reasonable amount to be paid by the Respondent to your Complainant as alimony pendente lite.

Your Complainant further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between your Complainant and Respondent.

That the care, custody and control of the child be awarded to the Complainant, and that upon a final hearing of this cause, that your Complainant be awarded as maintenance for the child named herein the sum of Fifty (\$50.00) Dollars per month, and your Complainant prays for such other further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for Complainant.

284
450

EDWARD X. RHONE
258-11-1111
RESPONDENT
Has not been
alone
154

From the law offices of
C. LeNoir Thompson
Bay Minette, Alabama

~~258 1/2 Washington Ave.~~
306 N. Anna

[illegible]

25