

2769

JOSEPH LOCHIRCO,) (IN THE CIRCUIT COURT OF
Complainant,) (BALDWIN COUNTY, ALABAMA
- vs -) (IN EQUITY
ROSE LOCHIRCO,) (
Respondent.) (

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

Your Complainant, Joseph Lochirco, respectfully represents and shows unto your Honor:-

I. That Complainant is over the age of twenty-one years and is a resident of said State and County, 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 Rose Lochirco is over the age of twenty-one years and is a non-resident of the State of Alabama, her last known address being 9 Washington Square, Gloucester, Massachusetts.

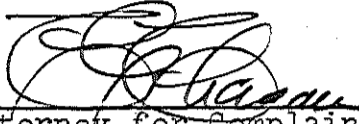
II. That your Complainant and Respondent were lawfully married on or about, to-wit, September 9, 1945.

III. Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: your Complainant prays that Rose Lochirco 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 service be had upon the Respondent by registered mail with return receipt requested as provided by the statutes and rules of this Court; 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.



Attorney for Complainant


Complainant

JOSEPH LOCHIRCO,) (
Complainant,) (IN THE CIRCUIT COURT OF
- vs -) (BALDWIN COUNTY, ALABAMA
ROSE LOCHIRCO,) (IN EQUITY
Respondent.) (

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

Your Complainant, Joseph Lochirco, respectfully represents and shows unto your Honor:-

I. That Complainant is over the age of twenty-one years and is a resident of said State and County, 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 Rose Lochirco is over the age of twenty-one years and is a non-resident of the State of Alabama, her last known address being 9 Washington Square, Gloucester, Massachusetts.

II. That your Complainant and Respondent were lawfully married on or about, to-wit, September 9, 1945.

III. Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: your Complainant prays that Rose Lochirco 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 service be had upon the Respondent by registered mail with return receipt requested as provided by the statutes and rules of this Court; 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

NO 2769

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BILL OF COMPLAINT

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JOSEPH LOCHIRCO,
Complainant,

- vs -

ROSE LOCHIRCO,
Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

() () () () () () () ()

FILED
JAN 125 1952

ALICE J. DUCK, Register

COMPLAINANT
Joseph Lochirco

RESPONDENT
Rose Lochirco

NOTICE TO YOU BE SUFFICIENT TO BE IN YOUR POWER TO WILL EACH DAY.

1 5 1

The State Of Alabama }
Baldwin County

Circuit Court of Baldwin County, In Equity.

To Any Sheriff of the State of Alabama—GREETINGS:

WE COMMAND YOU, That you summon

Rose Lockwood

of _____ County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited

by *Joseph Lockwood*

against said

Rose Lockwood

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, *Beisig* Duck, Register of said Circuit Court, this *9th* day of *January*, 194*2*.

Beisig J. Duck, Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Serve On _____

**Circuit Court of Baldwin County
IN EQUITY**

No. _____

Summons

vs.

Solicitor for Complainant

**THE STATE OF ALABAMA,
Baldwin County**

Received in office this _____

day of _____, 194_____

Sheriff.

Executed this _____ day of

_____, 194_____

by leaving a copy of the Summons with

Defendant

Sheriff

By _____

Deputy Sheriff

5946

Recorded in Vol. _____ Page _____