

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2816

TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Annie Lee Tate

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 \_\_\_\_\_

Annie Lee Tate

Defendant .....

by James Allen Tate

Plaintiff.....

Witness my hand this 26th day of May 19. 52.....

Annie Lee Tate, Clerk

No. ....

Page .....

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT**

vs.

Plaintiffs

Defendants

**SUMMONS and COMPLAINT**

Filed ....., 19.....

....., 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

STATE OF ALABAMA, BALDWIN COUNTY

JAMES ALLEN TATE,

Complainant

vs

ANNIE LEE TATE,

Respondent

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

To the Honorable Judge of the Circuit Court of Baldwin County, sitting in Equity.

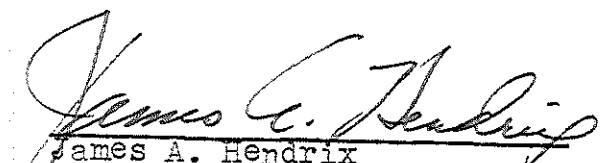
Your Complainant, James Allen Tate, respectfully represents and shows unto your Honor:

1. That Complainant is over the age of twenty-one years, is a resident of said State and County, and has been a bona fide resident of said State for more than two years next preceeding the filing of this Bill of Complaint; that Annie Lee Tate is over the age of eighteen years and resides at 8 Roosevelt Street, Plateau, Alabama.
2. That your Complainant and Respondent were lawfully married on or about, to-wit, June 1, 1949, at Robertsdale, Alabama.
3. Your Complainant further avers and alleges that said Respondent has been guilty of adultery with divers parties and persons whose names to your Complainant are unknown.
4. The Complainant avers and shows unto the Court that there were no children born out of the aforesaid marriage.

The premises considered, your Complainant makes the said Annie Lee Tate a party respondent to this Bill of Complaint, and in order that Complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed, to the said Annie Lee Tate commanding her to answer, plead or demur to this Bill of Complaint, within the time required by law; and that on a final hearing of this cause,

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that your Honor will enter a decree divorcing your Complainant  
from said Respondent, granting the Complainant the right to re-  
marry; and that your Honor will grant such other, further, and  
different relief as unto your Honor may seem just and proper.

  
James A. Hendrix  
Solicitor For Complainant