

1255

STATE OF ALABAMA
BALDWIN COUNTY

WE COMMAND YOU, that you summon CLARE BARNES to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty days after the service of summons, and there to plead, answer or demur without oath to a bill of complaint lately exhibited by Ernest E. Barnes, against the said Clare Barnes, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court, immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court this the 9th day of January, 1945.

R. S. Duck
Register

ERNEST E. BARNES
COMPLAINANT

VS.

CLARE BARNES
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now comes your Complainant, Ernest E. Barnes, and humbly complaining against the Respondent, Clare Barnes, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of the State of Alabama, and have been for more than 12 months next preceding the filing of this bill of complaint; and that both are over twenty-one years of age;

2.

That your Complainant and the Respondent were married at Scottsboro, Alabama, in September, 1939, and lived together as husband and wife, in Alabama, until September 12, 1942;

3.

That on September 12, 1942, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Clare Barnes, party Respondent to this cause of action, requiring her 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 your Honor will, upon the final hearing hereof, enter an order and decree granting to the Complainant an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that your Honor will give and grant to him such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

By: 

Solicitors for the Complainant

The Respondent's address:

Rt. 3, Scottsboro, Ala.
(She lives in Marshall Co.)

125-5-

ERNEST E. BARNES
COMPLAINANT

VS.

CLARE BARNES
RESPONDENT

SUMMONS AND COMPLAINT

Recd Jan 9 1945
Roderick
Byler

Bay Minette,

To the Sheriff of Marshall County,
Greentownville, Alabama.

I enclose herewith summons + complaint in the
Case of Ernest E. Barnes vs. Clara Barnes
A copy to be served on Clara Barnes
who's address is Rt. 3, Scottsboro, Ala.

Please serve and return as early as possible.

C. E. Garrett

Sheriff, Baldwin County, Alabama.

(If not found in your county please advise promptly giving information as to present location, if possible)

Not Found in Marshall
County

Em Boyles Sheriff

By Ollie Ferraner
D. S.

STATE OF ALABAMA
BALDWIN COUNTY

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COMPLAINANT

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BEEBE & HALL

By: *Shurtree*
Solicitors for the Complainant

The Respondent's address:

Rt. 3, Scottsboro, Ala.
(She lives in Marshall Co.)

