

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 Leroy Caldwell 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 Mildred B. Caldwell, as Complainant, against Leroy Caldwell, as Respondent.

Witness my hand this the 27 day of August, 1957.

			Register Anch
MILDRED B.	CALDWELL,	Ĭ	
	Complainant,	Ĭ	IN THE CIRCUIT COURT OF
vs.		I	BALDWIN COUNTY, ALABAMA
LEROY CALDWELL,		X	IN EQUITY
LERUI CALL	Respondent.	X	
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Comes your Complainant, Mildred B. Caldwell, and files this her Bill of Complaint for divorce against Leroy Caldwell, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and Respondent are both over the age of twenty-one years and the Complainant is a resident citizen of Baldwin County, Alabama, and has been a resident citizen of such County for more than the last two years. That the Respondent is now a resident citizen of Chicago, Illinois, and his postoffice address is 921 East 42nd Place, Chicago, Illinois.

SECOND:

That your Complainant and the Respondent were married on heretofore, to-wit: Eebruary 17, 1951, and lived together as man

and wife until, on account of the matters hereinafter complained of, your Complainant was abandoned by the Respondent. On August 11, 1956, the Respondent voluntarily abandoned the bed and board of your Complainant without just cause or legal excuse and he has failed and refused to live with her since that time.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Complainant prays that the above named Leroy Caldwell be made a party Respondent to this cause by the usual writ or process of this Honorable Court requiring him 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 and 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 the Complainant be allowed to remarry if she sees fit. The Respondent being a non-resident of the State of Alabama, your Complainant prays that the Register of this Court will mail a copy of the Summons and the Bill of Complaint to such Respondent by registered or certified mail, postage prepaid, marked for delivery only to the person to whom addressed with a return receipt requested. Your Complainant further prays that should such Respondent fail or refuse to receive such Summons and Bill of Complaint by registered mail and should such papers be returned to the Register, that such Register will then cause a notice to be published in some newspaper published in Baldwin County, Alabama, as required by law. Your Complainant further prays that should she be mistaken in the relief prayed for that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

Mildred B. Caldwell Complainant

CHASON & STONE Solicitors for Complainant

STATE OF ALABAMA BALDWIN COUNTY

That her name is Mildred B. Caldwell; that she is the Complainant in the above styled cause; that Leroy Caldwell, the Respondent in the above styled cause is over the age of twenty-one years and is a non-resident of the State of Alabama; that his postoffice address is 921 East 42nd Place, Chicago, Illinois. That all of the allegations of the foregoing Bill of Complaint are true and correct.

Mel And B. Culdwill

Sworn to and subscribed before me on this the 27th day of August, 1957.

Notary Public, Baldwin County, Alabama

Form 3811 Rev. 1-52

RETURN RECEIPT

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