

WILLIAM A. ARCHER)
COMPLAINANT)
VS)
MILDRED E. ARCHER)
RESPONDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. - 4209

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Your complainant William A. Archer, respectfully represents and shows unto your Honor:

1. That the complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State and County for more than one year next preceding the filing of this bill of complaint; that Mildred E. Archer, the respondent is over the age of twenty-one years and her place of residence is unknown.

2. That your complainant and respondent were lawfully married on or about, to-wit: October 15, 1949 at Frankton, Indiana and of this union there is one child, William Paul Archer, Born July 9, 1952.

3. That your 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 reconized each other as husband and wife.

The premises considered, your complainant makes the said Mildred E. Archer, a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honors to cause the State's writ of subpoena to be issued, directed to the said Mildred E. Archer, commanding her to answer, plead or demur to the bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honors will enter a decree, divorcing your complainant from said respondent, and that your Honors will grant such other, further and different relief as unto your Honors may seem just and proper, and your complainant will ever pray.


ATTORNEY FOR COMPLAINANT

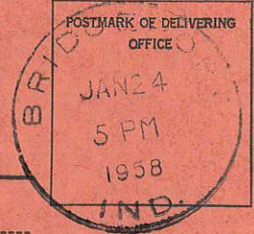
4209

Reg. Mar. 2

FILED
JAN 21 1958
ALICE A. ECK, Clerk

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SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 4209

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Mildred E. Archer

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

Mildred E. Archer, Defendant

by William A. Archer

Plaintiff

Witness my hand this 21st day of January 19 58

Deice J. Duck, Clerk