

4115

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. S. Bunch, 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 Mary Lee Bunch, as Respondent.

WITNESS my hand this the \_\_\_\_\_ day of \_\_\_\_\_, 1957.

Register.

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MARY LEE BUNCH  
COMPLAINANT  
VS  
A. S. BUNCH  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY.  
CASE NO. \_\_\_\_\_

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

Your Complainant, Mary Lee Bunch, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and a resident of Alabama and has been more than two years next preceding; The Respondent is over the age of 21 and a non-resident of the State of Alabama.

2.

That your Complainant and the Respondent married at Waynesboro, Mississippi on June 26, 1942 and lived together as husband and wife in Baldwin County, Alabama until July 1, 1957.

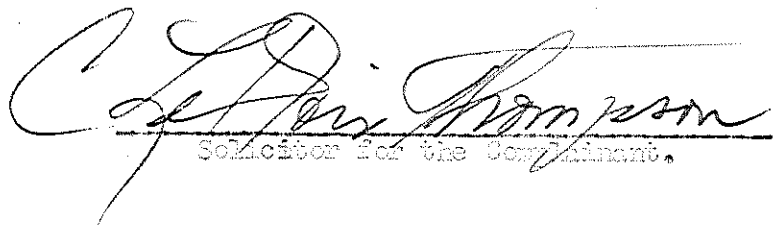
3.

That on July 1, 1957, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her persons, which would necessarily endanger her life and health.

There was born as fruits of this marriage between the Complainant and the Respondent four children, Rebecca Bunch, age 13; Jerry Bunch, age 10; Ramona Bunch, age 6; and Regina Bunch, age 2; and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said A. S. Bunch, party Respondent to this bill of complaint requiring him to plead, answer and demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to the Complainant the care, custody and control of the minor children, Rebecca Bunch, age 13; Jerry Bunch, age 10; Ramona Bunch, age 6; and Regina Bunch, age 2; and Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant.

FILED  
AUG 30 1957  
ALICE L. DUCK, Clerk

4115

FILED  
AUG 30 1957  
ALICE J. DUCK, Register

RECEIVED  
AUG 30 1957  
ALICE J. DUCK, Register

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

		The State of Alabama.
		Baldwin County.
No. 4115	}	
MARY LEE BUNCH		
vs. 4115	}	Circuit Court, in Equity
A.S. BUNCH		
		This the 30th day of
		August, 1947

In this cause it being made to appear to the Clerk of this Court by the affidavit of

MARY LEE BUNCH

that the Defendant

A.S. BUNCH

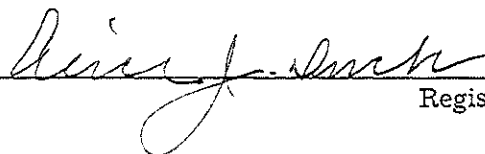
is a non-resident of the State of Alabama

His post office and whereabouts is unknown

and further, that, in the belief of said Affiant the Defendant A.S. Bunch over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

A.S. Bunch the said Respondent

to answer or demur to the Bill of Complaint in this cause by the 30th day of September 1947 or after thirty days therefrom a decree Pro Confesso may be taken against A.S. Bunch

  
Register.

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon A. S. Bunch, 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 Mary Lee Bunch, as Respondent.

WITNESS my hand this the \_\_\_\_\_ day of \_\_\_\_\_, 1957.

\_\_\_\_\_  
Register.

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MARY LEE BUNCH  
COMPLAINANT  
  
VS  
  
A. S. BUNCH  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
  
IN EQUITY.  
  
CASE NO. \_\_\_\_\_

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

Your Complainant, Mary Lee Bunch, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and a resident of Alabama and has been more than two years next preceding; The Respondent is over the age of 21 and a non-resident of the State of Alabama.

2.

That your Complainant and the Respondent married at Waynesboro, Mississippi on June 26, 1942 and lived together as husband and wife in Baldwin County, Alabama until July 1, 1957.

3.

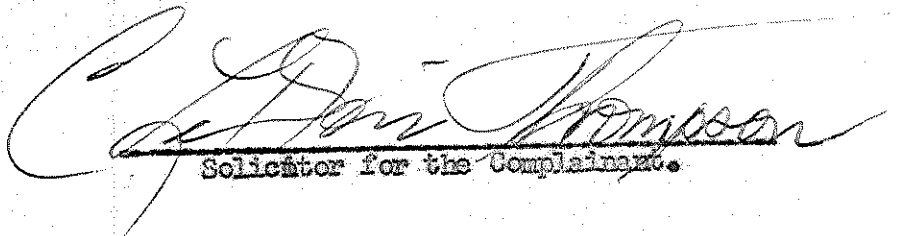
That on July 1, 1957, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her persons, which would necessarily endanger her life and health.

4.

There was born as fruits of this marriage between the Complainant and the Respondent four children, Rebecca Bunch, age 13; Jerry Bunch, age 10; Ramona Bunch, age 6; and Regina Bunch, age 2; and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said A. S. Bunch, party Respondent to this bill of complaint requiring him 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.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to the Complainant the care, custody and control of the minor children, Rebecca Bunch, age 13; Jerry Bunch, age 10; Ramona Bunch, age 6; and Regina Bunch, age 2; and Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant.

OFFICE OF THE CLERK  
JAN 30 1921

STATE OF ALABAMA  
BALDWIN COUNTY

Before me, the undersigned authority in and for the State of Alabama Baldwin County, personally appeared Mary Lee Bunch, who is known to me and who being by me first duly sworn according to law on oath doth depose and say that she is the Complainant in a certain cause being filed in the Circuit Court of Baldwin County, Alabama; that the Respondent in said cause, A. S. Bunch, is a non-resident of the State of Alabama and whose residence, after a search having been made with due diligence, is unknown according to the best information and belief of the Complainant and that your Complainant cannot ascertain the particular place of residence and Post Office address of the Respondent after expending a reasonable effort, which has been made; that said Respondent is over the age of twenty-one years.

Mary Lee Bunch

Sworn to and subscribed before me this 28 day of August, 1957.

Clifford Thompson  
Notary Public, Baldwin County, Alabama.

FILED  
AUG 30 1957  
ALICE J. DUCK, Clerk





JIMMY FAULKNER  
AND  
BILL STEWART  
PUBLISHERS

**THE BALDWIN TIMES**  
**BALDWIN COUNTY**  
*Alabama's Best County's Best Newspaper*  
**BAY MINETTE, ALABAMA**

E. R. MORRISSETTE, JR.  
EDITOR-MANAGER

The Baldwin Times, Bay Minette, Ala., Thursday, September 5, 1957

**Legal Notice**

**Notice To Non-Resident**

STATE OF ALABAMA,  
BALDWIN COUNTY.

In the Circuit Court, in Equity.  
This the 30th day of August,  
1957.

NO. 4115

Mary Lee Bunch vs. A. S. Bunch.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Mary Lee Bunch that the Defendant A. S. Bunch is a non-resident of the State of Alabama. His post office and whereabouts is unknown and further, that, in the belief of said Affiant the Defendant A. S. Bunch over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring A. S. Bunch the said Respondent to answer or demur to the Bill of Complaint in this cause by the 30th

day of September 1957, or after thirty days thereafter a decree Pro Confesso may be taken against A. S. Bunch.  
ALICE J. DUCK,  
Register.

**AFFIDAVIT OF PUBLICATION**

AMA.  
BALDWIN COUNTY.

E. R. Morrisette being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Notice to non-Resident  
Mary Lee Bunch v.s. A.S. Bunch

**COST STATEMENT**

168 WORDS @ 6 1/2 cents ..... \$ 10 92  
I hereby certify this is correct, due and unpaid (paid).

E. R. Morrisette Jr  
Editor.

was published in said newspaper for \_\_\_\_\_ consecutive weeks in the following issues:

Date of 1st publication Sept. 5, 1957 Vol. 69 No. 34  
Date of 2nd publication Sept. 12, 1957 Vol. 69 No. 35  
Date of 3rd publication Sept 19, 1957 Vol. 69 No. 36  
Date of 4th publication Sept 26, 1957 Vol. 69 No. 37

Subscribed and sworn before the undersigned this 19 day of Sept, 1957.

Dorothy Martin  
Notary Public, Baldwin County.

E. R. Morrisette Jr  
Editor.