

4147

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. ....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Ruth A. Smith

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 \_\_\_\_\_

Ruth A. Smith, Defendant .....

by \_\_\_\_\_

John M. Smith, Plaintiff.....

Witness my hand this 15th day of October 19...57...

Deirdre Newkirk, Clerk

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

**CIRCUIT COURT**

Plaintiffs

vs.

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

JOHN M. SMITH  
COMPLAINANT  
VS  
RUTH A. SMITH  
RESPONDENT

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

BILL OF COMPLAINT

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

Your Complainant, John M. Smith, respectfully shows unto  
your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of twenty-one years,  
and is a bona fide resident of Baldwin County, Alabama; that  
the Respondent, Ruth A. Smith, is over the age of twenty-one  
years and is now residing in South Carolina.

2.

That the Complainant and the Respondent were married at  
Lucedale, Mississippi, on the 22nd day of March, 1952, and have  
lived together as husband and wife until on to-wit: August the  
12th, 1957.

3.

Your Complainant further avers that the Respondent has  
become addicted to habitual drunkenness since the date of their  
marriage on March the 22nd, 1952. Said addiction has continued  
up to and including the date of seperation as aforesaid.

4.

That there was no children born as fruits of this marriage.

PRAYER FOR PROCESS AND RELIEF

WHEREFORE, THE PREMISES CONSIDERED, Your Complainant prays  
that the Respondent, Ruth A. Smith, be made a party Respondent  
to this cause by the usual writ of process of this Honorable  
Court requiring her to appear and plead, answer or demur with-  
in the time and under the penalties prescribed by the rules of  
this Court and under the Statutes in such cases made and pro-  
vided.

Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from said Respondent.

Complainant further prays for all such other further and different relief to which he may be entitled and as in duty bound he will ever pray.

John M. Smith  
Complainant

Solicitor for Complainant

John M. Smith 4147  
Complainant

vs.

Ruth A. Smith  
Respondent

Divorce

Bill of Complaint

Smith

FILED  
OCT. 15 1957  
ANCE J. DUCK, Register

4147

Form 3811  
Rev. 1-52

# RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this Card.

1 *Ruth A. Smith*  
(Signature or name of addressee)

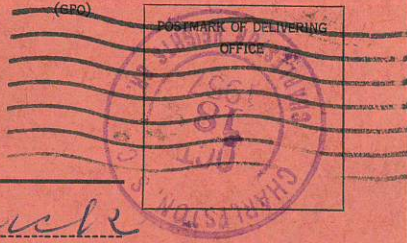
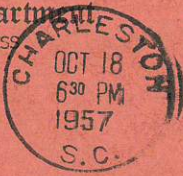
2 \_\_\_\_\_  
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery **OCT 18 1957**, 19\_\_

FILED  
OCT 21 1957  
REGISTER

Post Office Department  
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300



Return to Alice J. Duck

Street and Number, or Post Office Box, Box 239

REGISTERED ARTICLE

Post Office Bay Minette

No. \_\_\_\_\_

INSURED PARCEL

State Ala.

No. \_\_\_\_\_

16-12421