

WILLIE STAIMPEL,
Complainant,
vs.
SUE TRAMMEL,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

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

Your Complainant, Willie Staimpel, respectfully shows
unto the Court and your Honor as follows:

1. Your Complainant, Willie Staimpel, is over the
age of twenty-one years and is a resident citizen of Baldwin
County, Alabama; that the Respondent, Sue Trammel, is over the
age of twenty-one years but her place of residence and Post Office
address is unknown and it cannot be ascertained after reasonable
effort in regard thereto.

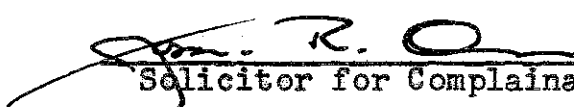
2. That a marriage ceremony was performed between
your Complainant and Respondent in Biloxi, Millissippi, during the
month of November, 1956; that said marriage ceremony was performed
under a mistake of fact existing in the mind of your Complainant
and that the said marriage was and is void.

3. That the Respondent in this cause was already
married to a man named Trammel at the time of the purported
marriage between your Complainant and the Respondent, and that the
said Respondent was not divorced at the time of the purported
marriage. That during the month of December, 1956, and after your
Complainant and Respondent had lived together as man and wife for
approximately one month, your Complainant discovered that the
Respondent was married and he and the said Respondent separated and
have not lived together since December, 1956, as husband and wife.

4. Since Complainant has learned the true marital
status of the Respondent, he does not desire to consumate said
marriage relation and it is his will and desire that said marriage
should be annulled.

The premises considered your Complainant makes the said Sue Trammel a party Respondent to this Bill of Complaint and prays that service may be had upon her in the manner prescribed by law, and that she be required to plead, answer or demur to this Bill of Complaint within thirty days after such service, and that upon a final hearing hereof your Complainant prays that this Honorable Court will make and enter a decree adjudging and declaring the said marriage ceremony between your Complainant and the said Respondent to be null and void, and that the marriage relation does not exist between your Complainant and the said Respondent, Sue Trammel.

Your Complainant further prays that he may have such other, further or different relief as in equity he may be entitled.


Solicitor for Complainant.

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IN THE CIRCUIT COURT OF
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IN EQUITY.

Before me, the undersigned authority, personally appeared Willie Staimpel, the complainant in the above styled cause, who first being duly and legally sworn, deposes and says:

That the Respondent, Sue Trammel, in the above styled cause, is a non-resident of the State of Alabama, and that her place of residence is unknown, and that it cannot be ascertained after reasonable effort and further, that in the belief of affiant, the said Respondent is over the age of twenty-one years.

Willie Staimpel

Sworn to and subscribed before
me on this the 5th day of
November, 1957.

[Signature]
Notary Public, Baldwin County, Alabama.

FILED

NOV 6 1957

ALICE J. DUCK, Register

WILLIE STAIMPEL, | IN THE CIRCUIT COURT OF
Complainant, | BALDWIN COUNTY, ALABAMA
vs. | IN EQUITY.
SUE TRAMMEL, |
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ORDER OF PUBLICATION

In this cause, it appearing to the Register from the affidavit of Willie Staimpel, Complainant, that the residence and Post Office address of the Respondent, Sue Trammel, are unknown and further, that in the belief of said affiant, the Respondent, Sue Trammel, is over the age of twenty-one years, it is therefore ORDERED by the Register that publication be made once a week for four consecutive weeks, in the Baldwin Times, a newspaper published in Baldwin County, Alabama, requiring the said Sue Trammel to Plead, answer or demur to the Bill of Complaint in this cause by the 9th day of December, 1957, or, in default thereof, thirty days thereafter a decree pro confesso may be taken against said Respondent.

ORDERED on this the 6th day of November, 1957.

Alice J. Duck
ALICE J. DUCK,
Register.

70.416!

RECORDED

FILED

NOV. 6 1957

ALICE J. BRICK, Register