The State of Alabama Baldwin County

Circuit Court

Equity

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and the cost, on provided by at	Act of the Legislature of Alabam	na, approved September 25th, 1919,
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of Complaint filed in t	he Circuit Court of Baldwin Count	ty, Alabama, against you, Defend-
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_{ut ha} Jean M.	Sabell	
Dy	Sabell	Complainant
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Witness by hand this Of	th day of December	
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JEAN M. SABELL)	IN THE CIRCUIT COURT O
COMPLAINANT	BALDWIN COUNTY, ALABAM
VS **	IN EQUITY
JOHN JOSEPH SABELL) RESPONDENT:)	

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

Comes your complainant Jean M. Sabell and respectfully represents and shows to your Honor:

- 1. That the complainant is over the age of eighteen years, and is a bona fide resident of Baldwin County, Alabama, and has been a bona fide resident of said State for more than one year next preceding the filing of this bill of complaint; that the respondent John Joseph Sabell is over the age of twenty-one years and whose bona fide residence to your complainant is unknown.
- 2. That your complainant and respondent were lawfully married in Goffrey, South Carolina, on or about to-wit: November 8, 1952, and that of this marriage there are no children.
- 3. Your complainant avers and charges that the respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonable convinced that he will commit an actual violence upon her person, attended with danger to her health or life.

The premises considered, the complainant makes the said John Joseph Sabell a party respondent to this bill of complaint, and in order that the complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of Subpoena issued, directed to the said John Joseph Sabell, commanding him to answer, plead or demur within the time required by law; and that on a final hearing of this cause, that your honor will enter a decree divorcing the complainant from the respondent; granting the complainant the right to resume her maiden name of Jean M. Michell; and that your Honor will grant such other, further or different relief as unto your Honor may seem meet and proper, and your complainant will ever pray.

SOLICITOR FOR COMPLAINANT

JEAN M. SABELL COMPLAINANT

VS.

JOHN JOSEPH SABELL RESPONDENT

BILL OF COMPLAINT



ARTHUR C. EPPERSON ATTORNEY AT LAW FOLEY, ALA.