

The State of Alabama  
Baldwin County

}

Circuit Court

Equity

To ~~Rebecca Sabell~~ John Joseph Sabell

.....  
.....  
You are hereby commanded to appear and plead, answer or demur, within thirty days from the service hereof, as provided by an Act of the Legislature of Alabama, approved September 25th, 1919, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, against you, Defendant....., by Jean M. Sabell.....Complainant.....

A copy of which Bill of Complaint is hereto attached.

Witness by hand, this 9th day of December 1954

*W. J. French*  
Register

JEAN M. SABELL )  
COMPLAINANT )  
VS )  
JOHN JOSEPH SABELL )  
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 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 preced-  
ing 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 com-  
mit 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 Sub-  
poena issued, directed to the said John Joseph Sabell, command-  
ing 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, fur-  
ther or different relief as unto your Honor may seem meet and  
proper, and your complainant will ever pray.

*Arthur C. Epperson*

SOLICITOR FOR COMPLAINANT

3419

JEAN M. SABELL  
COMPLAINANT

VS

JOHN JOSEPH SABELL  
RESPONDENT

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BILL OF COMPLAINT

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3419

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.