

CELINA MINNICH

V.

SCOTT MINNICH

\*  
\*  
\*  
\*  
\*  
\*

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

NO. 70. IN EQUITY.

Comes the complainant and suggests upon the record the death of the respondent and the consequent abatement of the case.

*Roscoe M. Miller*

Solicitors for Complainant.

CIRCUIT COURT, BALDWIN COUNTY

ALA.

IN EQUITY

NO. 70.

-----  
CELINA MINNICH

V.

SCOTT MINNICH

*Recorded on Minutes  
Page 21*

*Filed 4/17/1918  
J. McInerney  
Register*

-----  
BROOKS & McMILLAN

Solicitors for Complainant.

To obtain a receipt on the receipt... indorse the article, across the... Re-... cel... (V) in the space after the words... Re-... cel... space after the words... Delivery re-... sp... stricted to address in person... or the... letter "O" after the words... Delivery... restricted to addressee... in... dicates that a return receipt is desired... or that delivery is restricted... or of the... The absence of a check... indicates that letters "A" and "C" indicates that no return receipt is desired and that delivery is not restricted.

Letter Parcel

No. 773

P. O., BAY MINETTE, ALA.

Received for registration 7 2, 1918, from

G. M. P. J. [Signature]

addressed to Capt. B. [Signature] Detroit Mich

Receipt desired  Delivery restricted

(See printed information on this receipt.)

To addressee in person

To addressee or order

class postage prepaid.

Postmaster, per [Signature]

Post Office Department  
OFFICIAL BUSINESS

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

Original Reg. No.

773



RETURN TO

J. M. [Signature]  
(Name of)

Street and Number,  
or Post Office Box

Post Office at

Day Minette  
[Signature]

County

State

The postmaster who delivers the registered article must see that this card is properly signed, legibly postmarked, and mailed to the sender, without envelope or postage.

Largest Weekly Circulation in South Alabama

(10)

*Bay Minette, Ala.,* March 25th, 1918

M

Celina Minnich

vs

Scott Minnich

NOTICE TO NON-RESIDENT

# THE BALDWIN TIMES

ABNER J. SMITH, PROP.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

---

To publishing above Non-Resident Notice in The Baldwin  
Times in issues of February 28th and Mar 7, 14, 21, 1918: \$3.50

Celina Minnich

THE STATE OF ALABAMA,  
COUNTY.

vs.

CIRCUIT COURT, IN EQUITY.

Scott Minnich

This the 25th day of  
February 1918.

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

Celina Minnich

that the Defendant

Scott Minnich

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is,

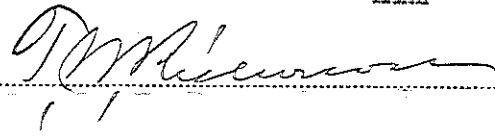
therefore, ordered that publication be made in the Baldwin Times

a newspaper published in the Bay Minette, Baldwin County Alabama, once a week for four

consecutive weeks, requiring the said Scott Minnich

to answer or demur to the Bill of Complaint in this cause by the 20th day of April

1918, or after three days therefrom a decree Pro Confesso may be taken against him



Register.

No. 70

THE STATE OF ALABAMA,

Baldwin County,

CIRCUIT COURT, IN EQUITY.

NOTICE TO NON-RESIDENT.

Celina Minnich

vs.

Scott Minnich

Filed in office this 3rd day of

February 1918

T. W. Richardson, Register.

Celina Winnich

THE STATE OF ALABAMA,  
COUNTY.

vs.

CIRCUIT COURT, IN EQUITY.

This the 25th day of  
February 1918.

Scott Winnich

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

Celina Winnich

that the Defendant

Scott Winnich

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is,

therefore, ordered that publication be made in the Baldwin Times

a newspaper published in the Bay Minette, Baldwin County Alabama, once a week for four

consecutive weeks, requiring the said Scott Winnich

to answer or demur to the Bill of Complaint in this cause by the 20th day of April

1918 or after thirty days therefrom a decree Pro Confesso may be taken against him

Register.



STATE OF ALABAMA, \* Before me, Grace A. Smith, a Notary  
\*  
COUNTY OF MOBILE. \* Public in and for said County in said  
\* State, personally appeared Celina

Minnich, who is known to me, and who, being duly sworn, deposes  
and says that Scott B. Minnich, the respondent in this cause,  
is upwards of twenty-one years of age and is a non-resident of  
Alabama, and resides at Detroit, Michigan, and his post office  
address is care of the Timken Club in that City.

Celina Minnich

Sworn to and subscribed before  
me this 9<sup>th</sup> day of February, 1918.

Grace A. Smith

Notary Public, Mobile County, Alabama.

1st

Filed 2/11 - 1918  
J. W. McCreary  
Register

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

McCreary, J. W.

three and a half years of age. Said child resides with complainant and complainant is a proper person to have custody of said child and respondent is not a proper person to have custody of said child.

## SIXTH.

Complainant has no money or other means except her daily labor for the support of herself and said child. Respondent is an able-bodied man and capable of earning a sufficient amount for the support of himself and complainant and said child.

## PRAYER FOR PROCESS.

Complainant prays that by the State's writ of subpoena said Scott B. Minnich be made a respondent to this bill of complaint and be commanded to demur to, plead to or answer this bill of complaint within the time allowed by law.

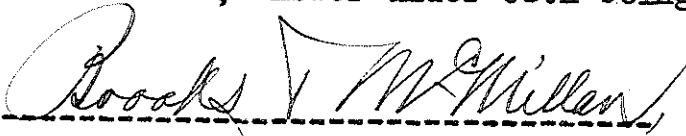
## PRAYER FOR RELIEF.

Complainant prays that your Honor will order a reference or references to the Register to ascertain what would be a reasonable solicitors' fee for the solicitors for complainant and reasonable alimony pendente lite and also what would be reasonable permanent alimony, and on the coming in of a report or reports from the Register will decree that respondent pay such solicitors' fee, alimony pendente lite and permanent alimony; that the bonds of matrimony existing between complainant and respondent be forever dissolved and annulled and a divorce granted complainant against respondent; that the custody of said child be granted to complainant; and that complainant be granted such further or other relief as equity may require.

  
-----  
Solicitors for Complainant.

## FOOT NOTE:

The respondent is required to answer all the allegations of each paragraph of the foregoing bill of complaint from first to sixth, both inclusive, but not under oath, answer under oath being hereby expressly waived.

  
-----  
Solicitors for Complainant.

CELINA MINNICH,  
Complainant,  
v.  
SCOTT B. MINNICH,  
Respondent.

\*  
\*  
\*  
\*  
\*  
\*  
\*

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

TO THE HONORABLE JUDGE OF SAID COURT:

The bill of complaint of Celina Minnich, complainant, against Scott B. Minnich, respondent, respectfully shows unto your Honor that:

FIRST.

Complainant is upwards of twenty-one years of age and resides in Fairhope, Baldwin County, Alabama;

Respondent is upwards of twenty-one years of age and resides in Detroit, Michigan, and his post office address is care of the Timken Club in that city.

SECOND.

Complainant has been bona fide a resident of this state for three years next before the filing of this bill of complaint, having resided at Fairhope, Baldwin County, Alabama, continuously for said three years.

THIRD.

Complainant and respondent were married to each other at Fairhope, Baldwin County, Alabama, on to-wit, April 12, 1913, and lived together as man and wife until respondent abandoned complainant as herein shown.

FOURTH.

Prior to February 1, 1916, respondent voluntarily abandoned complainant from bed and board and said abandonment continued without interruption from the time of said original abandonment until the filing of this bill of complaint.

FIFTH.

There was born to complainant and respondent by said marriage only one child, namely, Owen Roberts Minnich, a boy, now about

# THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

## AFFIDAVIT OF PUBLICATION

### Notice to Non-Resident

Celina Minnich vs. Scott Minnich. No. 70. The State of Alabama, Baldwin County Circuit Court, In Equity. This the 23rd day of February, 1918.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Celina Minnich, that the Defendant Scott Minnich, is a non-resident of the State of Alabama, and further, that in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in the town of Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Scott Minnich to answer or demur to the Bill of Complaint by the 20th day of March, 1918, or decree Pro Con against him.  
 rson, Register.

STATE OF ALABAMA,  
BALDWIN COUNTY.

P. C. Smith, being duly sworn, deposes and says that he is the FOREMAN of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

NOTICE TO NON-RESIDENT No 70.

Celina Minnich vs Scott Minnich

Baldwin County Circuit Court, In Equity.

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<u>February 28th, 1918</u>	Vol. <u>29</u>	No. <u>2</u>
“ “ second “	<u>March 7th, 1918</u>	Vol. <u>29</u>	No. <u>3</u>
“ “ third “	<u>March 14th, 1918</u>	Vol. <u>29</u>	No. <u>4</u>
“ “ fourth “	<u>March 21st, 1918</u>	Vol. <u>29</u>	No. <u>5</u>

Subscribed and sworn to before the undersigned

this 25 day of March 1918.

W. W. Rice  
Clerk Circuit Court

P. C. Smith  
 Foreman.

Filed Apr 18 18  
J. W. R. R. R. R.  
Regent