

3537

**NOTICE TO NON-RESIDENT**

The Baldwin Times, Bay Minette, Alabama

Circuit Court of Baldwin County, in Equity	} The State of Alabama, Baldwin County.
No. 3537	
John Richard Rose	} Circuit Court, in Equity
vs.	
Amy May Rose	} This the 11th day of October, 1955

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

that the Defendant Amy May Rose

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 Fairhope Courier ~~Baldwin Times~~, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Amy May Rose

to answer or demur to the Bill of Complaint in this cause by the 11th day of November 1955, or after thirty days therefrom a decree Pro Confesso may be taken against her

*Amy J. Smith*  
Register.

STATE OF ALABAMA )  
BALDWIN COUNTY )

AFFIDAVIT

Before me, Ernest M. Bailey, Notary Public in and for the State of Alabama at Large, personally appeared JOHN RICHARD ROSE, who is known to me and who being by me first duly sworn, deposes and says:

That he is the Complainant in that certain action pending in the Circuit Court of Baldwin County, Alabama, wherein John Richard Rose is the Complainant and Amy May Rose is Respondent; that the Respondent, Amy May Rose, is a non-resident of the State of Alabama and that her present residency cannot be ascertained by reasonable effort; that the last known residency of Amy May Rose was to the best of his knowledge and belief, Bristol, Rhode Island; that the residency of the Respondent, Amy May Rose, is otherwise unknown to him; that the Respondent, Amy May Rose, is over the age of twenty-one years.

John Richard Rose  
John Richard Rose

Sworn to and subscribed before me this 3rd day of June, 1955.

Ernest M. Bailey  
Ernest M. Bailey, Notary Public  
State of Alabama at Large

720 3537

JOHN RICHARD ROSE,  
Complainant

vs

AMY MAY ROSE,  
Respondent

AFFIDAVIT OF NON RESIDENCY

ERNEST M. BAILEY

FILED  
JUN 6 1955  
ALBIE J. DIXON, Register



# The Fairhope Courier



ESTABLISHED 1894

E. S. GASTON ESTATE, PUBLISHERS

TELEPHONE 5201

FAIRHOPE, ALABAMA

*"On Mobile Bay"*

This is to certify that the  
attached legal notice appeared  
in The Fairhope Courier, a news-  
paper published weekly in the  
City of Fairhope, County of  
Baldwin, State of Alabama on  
the dates of Oct. 13, 20, 27  
and Nov. 3, 1955.

*Marcel M. Crawford*  
-----  
Editor

State of Alabama  
County of Baldwin

Sworn and subscribed to this third  
day of February A. D. 1956, before me.

*Barbara J. Thomas*  
-----  
Notary Public, Baldwin County

Barbara J. Thomas - Notary Public  
Baldwin County  
My commission expires Feb. 11, 1959

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon AMY MAY ROSE to appear and plead, answer or demur, within thirty days from the services hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, In Equity, by JOHN RICHARD ROSE, as Complainant, against AMY MAY ROSE, as Respondent.

Witness my hand this \_\_\_\_\_ day of \_\_\_\_\_, 1955.

\_\_\_\_\_  
Register

-----

JOHN RICHARD ROSE, Complainant	Ø	IN THE CIRCUIT COURT OF
vs.	Ø	BALDWIN COUNTY, ALABAMA
AMY MAY ROSE, Respondent	Ø	IN EQUITY

To the Honorable Judges of the Circuit Court of Baldwin County, Alabama  
Sitting in Equity:

Your Complainant, John Richard Rose, respectfully represents and shows unto Your Honors:

FIRST:

That Complainant is over the age of twenty-one years and is a resident of said county and state, and has been a bona fide citizen resident of said state for more than one year next preceeding the filing of this Bill of Complaint; that Respondent is over the age of twenty-one years and that her last known address was Bristol, Rhode Island and is otherwise unknown.

SECOND:

That your Complainant and Respondent were lawfully married on or about, to-wit, August 24, 1950 at North Kingston, Rhode Island.

THIRD:

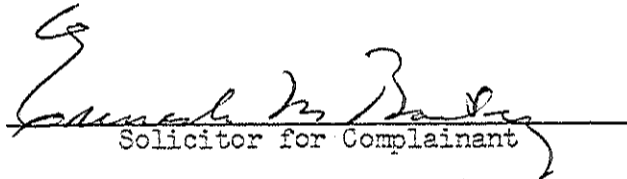
Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant on or about, to-wit, September, 1951, since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.

FOURTH:

That there was born of the marriage between your Complainant and the Respondent one child, LUCY MAY ROSE, four years of age. The said minor child is now in the care and custody of the Respondent.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named AMY MAY ROSE be made a party Defendant to this cause by the usual writ or process of this Honorable Court requiring her to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that Your Honor will grant unto your Complainant an absolute divorce from said Respondent and will decree that the parties hereto be allowed to remarry if they see fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.

  
Solicitor for Complainant

7203537

JOHN RICHARD ROSE  
Complainant

vs

AMY MAY ROSE,  
Respondent

BILL OF COMPLAINT

ERNEST M. BAILEY,  
ATTORNEY

FILED

JUN 26 1955

ALICE J. DICK, Register

STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY

RETURN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon AMY MAY ROSE to appear and plead, answer or demur, within thirty days from the services hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, In Equity, by JOHN RICHARD ROSE, as Complainant, against AMY MAY ROSE, as Respondent.

Witness my hand this 6<sup>th</sup> day of June, 1955.

*John R. Rose*  
Register

JOHN RICHARD ROSE,

Complainant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

vs.

AMY MAY ROSE,

Respondent

IN EQUITY

To the Honorable Judges of the Circuit Court of Baldwin County, Alabama  
Sitting in Equity:

Your Complainant, John Richard Rose, respectfully represents and shows unto Your Honors:

FIRST:

That Complainant is over the age of twenty-one years and is a resident of said county and state, and has been a bona fide citizen resident of said state for more than one year next preceeding the filing of this Bill of Complaint; that Respondent is over the age of twenty-one years and that her last known address was Bristol, Rhode Island and is otherwise unknown.

SECOND:

That your Complainant and Respondent were lawfully married on or about, to-wit, August 24, 1950 at North Kingston, Rhode Island.

THIRD:

Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant on or about, to-wit, September, 1951, since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.



FOURTH:

That there was born of the marriage between your Complainant and the Respondent one child, LUCY MAY ROSE, four years of age. The said minor child is now in the care and custody of the Respondent.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named AMY MAY ROSE be made a party Defendant to this cause by the usual writ or process of this Honorable Court requiring her to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that Your Honor will grant unto your Complainant an absolute divorce from said Respondent and will decree that the parties hereto be allowed to remarry if they see fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.

---

Solicitor for Complainant

FOURTH:

In the care and custody of the Respondent one child, JACK MAY ROSE, 10th month of age. The said minor child is now  
353  
353  
353

**SHAWNEE FOR PROGRESS AND SERVICE**

JOHN RICHARD ROSE  
Complainant

AMY MAY ROSE,  
Respondent

**BILL OF COMPLAINT**

**ERNEST M. BAILEY,  
ATTORNEY**

in any court he will ever try."

to him such other, further and different relief to which he may be entitled and as

should your Complaint be mistaken in the relief prayed it that there be amended and as

and will decree that the parties hereto be allowed to remain in their present

Honor will grant unto your Complaint an absolute divorce with and without

in such cases made and provided that upon a final hearing in this cause your

time under the penalties prescribed by the rules of this Court and the Statutes

this Supreme Court during her sojourn and legal answer or demurrer within the

AMY MAY be made a party Defendant to this cause by the usual writ or process of

the parties considered your Complaint says that she above named WILL

Collector for Complaint