

3682

STATE OF ALABAMA )  
BALDWIN COUNTY )  
BETTY JEAN BAILEY,

BOOK 021 PAGE 177

Complainant, )  
vs. )  
G. W. BAILEY )  
Respondent. )  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY.

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

Comes now the Complainant, BETTY JEAN BAILEY, humbly complaining of the Respondent, G. W. BAILEY, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, BETTY JEAN BAILEY, is over the age of eighteen years and is a resident of Baldwin County, Alabama, and has been a bona fide of said State for more than two years next preceeding the filing of this Bill of Complaint; that respondent's address is unknown to your complainant, and after a due and diligent search, complainant is unable to ascertain his place of residence or postoffice address; that the respondent is over the age of twenty-one years.

SECOND: That your complainant and respondent were lawfully married on or about, to-wit: May 15, 1954, at Bell Glade, Florida.

THIRD: Your complainant avers and charges that the said respondent did on or about the 22nd day of November, 1955, and on many occasions prior thereto assault, beat, hit, and strike complainant; that said respondent has committed actual violence on her person attended with dangers to her health and life; that the last of said assault did occur on November 22, 1955 and since that time complainant and respondent have not lived together as husband and wife due to said assault; complainant further avers that the respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her she is reasonably convinced that he will commit an actual violence upon her person which would endanger her life and health

FOURTH: Complainant further avers that there was born of the union of the complainant and respondent one child, GEORGE RONALD VERNON BAILEY, a boy, now about eight months old. That said child is now in the care, custody, and control of its mother, the complainant. Further that complainant is a fit and proper person to be awarded the care, custody, and control of said minor child, GEORGE RONALD VERNON BAILEY.

PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said G. W. BAILEY be made party Respondent to this her Bill of Complaint and that a summons be issue and served upon him as required by law and the rules of this Honorable Court, and that he be required to plead, answer or demur to the the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said decree the Complainant will be granted the right to again contract marriage, that by virtue of said decree the Complainant will be awarded the permanent care, custody and control of the said minor child, GEORGE RONALD VERNON BAILEY.

Complainant prays all other further and general relief to which she may be entitled, the premises considered and she will ever pray, ect.

Personally appeared before me BETTY JEAN BAILEY, being known to me and being first duly sworn, deposes and says that she has read the allegations in the foregoing complaint and that to the best of her knowledge and belief said allegations are true in all respects.

*Betty Jean Bailey*

Sworn to and subscribed before me  
this 16th day of ~~October, 1954.~~ *December, 1955.*

*James A. Hendrix*  
Notary Public, Baldwin County, Alabama.

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8601. Motion For Decree Pro Confesso on Publication.

B.T.-10-46-200

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT, IN EQUITY

No. \_\_\_\_\_, Term, 19\_\_\_\_

Betty Jean Bailey

Complainant

Vs.

G.W. Bailey

Defendant

Motion is hereby made for a Decree Pro Confesso against G.W. Bailey, the

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 6th day of March, 1956

746 Code

*James A. Hendrix*

Solicitor.

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
**BALDWIN COUNTY**

**CIRCUIT COURT, IN EQUITY**

**BETTY JEAN BAILEY**

Complainant—

Vs.

**G.W. BAILEY**

Defendant—

**Motion for Decree Pro Confesso**  
**On Publication**

Filed 3 - 6, 1956

*W. J. ...*  
Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

JIMMY FAULKNER  
PUBLISHER

# THE BALDWIN TIMES

## BALDWIN COUNTY

Alabama's Best County's Best Newspaper

BAY MINETTE, ALABAMA

### Legal Notice

NOTICE TO NON-RESIDENT  
BETTY JEAN BAILEY  
No. 3682

vs.  
G. W. BAILEY

The State of Alabama, Baldwin  
County, Circuit Court, in Equity.  
This the 20th day of December,  
1955

In this cause it being made to  
appear to the Clerk of this Court  
by the affidavit of Betty Jean  
Bailey that the Defendant G. W.  
Bailey is a non-resident of the  
State of Alabama whose present  
address is unknown and Post Of-  
fice address cannot be ascertain-  
ed, and further, that, in the be-  
lief of said Affiantant the De-  
fendant G. W. Bailey is over the

### AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA.  
BALDWIN COUNTY.

E. R. Mounsett, Jr., being duly sworn, deposes and says  
that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper pub-  
lished at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Betty Jean vs G. W. Bailey

age of 21 years; it is, therefore,  
ordered that publication be made  
in the Baldwin Times, a news-  
paper published in Bay Minette,  
Baldwin County, Alabama, once  
a week for four consecutive  
weeks, requiring G. W. Bailey,  
the said defendant, to answer or  
demur to the Bill of Complaint.  
this  
during plant decoration at the fac-  
tory in Bay Minette, is shown above  
Nelson E. Gallahan, manager of

### COST STATEMENT

188 WORDS @ 6 1/2 cents \_\_\_\_\_ \$ 12.22

I hereby certify this it correct, due and unpaid (paid).

E. R. Mounsett Jr  
Editor-Publisher

was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication Dec 22, 1955 Vol. 66 No. 49

Date of 2nd publication Dec 29, 1955 Vol. 66 No. 50

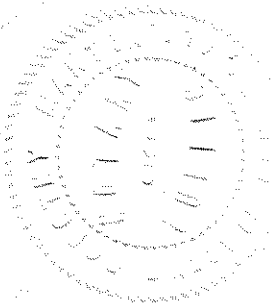
Date of 3rd publication Jan 5, 1956 Vol. 66 No. 51

Date of 4th publication Jan 12, 1956 Vol. 66 No. 52

Subscribed and sworn before the undersigned this 6 day of Mar, 1956

Darwin Martin  
Notary Public, Baldwin County.

E. R. Mounsett Jr  
Editor-Publisher



No 22  
29  
Jan 5  
**NOTICE TO NON-RESIDENT**

The Baldwin Times, Bay Minette, Alabama

BETTY JEAN BAILEY  
No. 3682  
vs.  
G.W. BAILEY

The State of Alabama,  
BALDWIN County.  
Circuit Court, in Equity  
This the 20 day of  
December, 1945

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

BETTY JEAN BAILEY

that the Defendant G.W. BAILEY

is a non-resident of the State of Alabama whose present address is unknown and Post Office address cannot be ascertained.

and further, that, in the belief of said Affiant ~~ant~~ the Defendant G.W. Bailey is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

G. W. Bailey the said defendant

to answer or demur to the Bill of Complaint in this cause by the 20th day of January 1945<sup>56</sup> or after thirty days therefrom a decree Pro Confesso may be taken against him.

*James A. Hendrix*  
Register.

JAMES A. HENDRIX  
SOLICITOR FOR COMPLAINANT

