

JOHN M. SMITH))	IN THE CIRCUIT COURT OF
))	
Complainant))	BALDWIN COUNTY, ALABAMA
))	
-VS-))	IN EQUITY
))	
RUTH A. SMITH))	
))	
Respondent))	
))	

BILL OF COMPLAINT

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

Your Complainant, John M. Smith, respectfully shows unto your Honor and this Honorable Court as follows:

I

That your Complainant is over the age of twenty-one years, and is a bona fide resident of Baldwin County, Alabama, and has been for more than one year next preceeding the filing of this Bill of Complaint; that the Respondent, Ruth A. Smith, is over the age of twenty-one years and is now residing in Pensacola, Florida.

II

That the Complainant and the Respondent were married at Lucedale, Mississippi, on the 22nd day of March, 1952, and have lived together as husband and wife until on towit; the 10th day of February, 1959.

III

Your Complainant further avers that the Respondent has become addicted to habitual drunkenness since the date of their marriage on March the 22nd, 1952. Said addiction has continued up to and including the date of separation as aforesaid.

IV

That there were no children born as fruits of this marriage.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No.

..... TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Ruth A. Smith

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Ruth A. Smith, Defendant

by John M. Smith

....., Plaintiff

Witness my hand this 25th day of Feb 1959

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Benjamin ..., Clerk

No. 4516 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

JOHN M. SMITH

Plaintiffs

vs.

RUTH A. SMITH

Defendants

Summons and Complaint

Filed _____ 19____

FILED

Clerk

FEB 25 1930

ALICE J. DUCK, CLERK
REGISTER

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

_____ 19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

_____ Sheriff

_____ Deputy Sheriff

PRAYER FOR PROCESS AND RELIEF

WHEREFORE, the premises considered, your Complainant prays that the Respondent, Ruth A. Smith, be made a party Respondent to this cause by the usual writ of 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 under the statutes in such case made and provided.

Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from said Respondent.

Your Complainant prays for all such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.


Complainant


Solicitor for Complainant

4516

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The first part of the report is a summary of the work done during the year. It is followed by a detailed account of the various projects which have been carried out. The report then goes on to discuss the results of these projects and the conclusions which have been drawn from them. Finally, there is a section on the future work which is planned for the next year.

The second part of the report is a list of the various projects which have been carried out during the year. This list is arranged in chronological order and includes a brief description of each project. It also includes the names of the people who were responsible for carrying out each project.

