

(4/626)

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4626 -----

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JOSEPHINE SEITZ

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

----- JOSEPHINE SEITZ -----, Defendant

by WILLIAM H. SEITZ -----

-----, Plaintiff

Witness my hand this 29th day of June 1959

W. H. Seitz

Chris Duck, Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

WILLIAM H. SEITZ

Plaintiffs

vs.

JOSEPHINE SEITZ

Defendants

Summons and Complaint

Filed 20th June 19 59

Clerk

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

WILLIAM H. SEITZ)
Complainant)
VS:)
JOSEPHINE SEITZ)
Respondent)

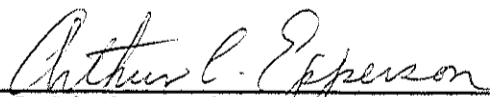
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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

Your complainant, William H. Seitz, respectfully represents and
shows unto your Honor:

1. That the complainant is over the age of twenty-one years
and is a resident of said State and County, and has been a bona-
fide resident for more than one year next preceding the filing
of the Bill of Complaint: that Josephine Seitz is over the age
of twenty-one years, whose address is Elberta, Baldwin County,
Alabama.
2. That your complainant and respondent were lawfully married
on or about to-wit: July 23, 1953, in Pascagoula, Mississippi,
and of this marriage there are two children, John, four years
of age and William, three years of age.
3. Your Complainant further avers and alleges that said res-
pondent has been guilty of adultery with divers parties and per-
sons whose names to your complainant are unknown.

The premises considered, your complainant makes the said Jose-
phine Seitz 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 subpoena
to be issued, directed to the said Josephine Seitz, commanding
her to answer, plead or demur to this Bill of Complaint within
the time required by law; and that on a final hearing of this
cause, that your Honor will enter a decree divorcing your com-
plainant from the respondent; and that your Honor will grant such
other, further or different relief as unto your Honor may seem
just and proper, and your complainant will ever pray.


Solicitor for Complainant

4626 Colbert

Received 20 day of June 1958
and on _____ day of _____ 19____
served a copy of the within Bill of Complaint
in Josephine Seitz
by service on _____

TAYLOR WILKINS, Sheriff

By _____ D. S.

N.F.

N.F.

WILLIAM H. SEITZ
Complainant

VS:
JOSEPHINE SEITZ
Respondent

BILL OF COMPLAINT

turned 8 day of Aug 1958
not found in my county after diligent search and
effort.

Taylor Wilkins, Sheriff

[Signature]
Deputy Sheriff

Colbert

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No.

..... TERM, 19.....

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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

JOSEPHINE SEITZ

....., Defendant

by WILLIAM H. SEITZ

....., Plaintiff

Witness my hand this 20th day of June 1959

Alice J. Hark, Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

WILLIAM H. SEITZ

Plaintiffs

vs.

JOSEPHINE SEITZ

Defendants

Summons and Complaint

Filed 20th June 19 59

Clerk

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

2667

Bill of Complaint

Josephine Seitz

William H. Seitz

WILLIAM H. SEITZ)
Complainant)
VS:)
JOSEPHINE SEITZ)
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, SITTING IN EQUITY:

Your complainant, William H. Seitz, respectfully represents and
shows unto your Honor:

1. That the complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona-fide resident for more than one year next preceding the filing of the Bill of Complaint: that Josephine Seitz is over the age of twenty-one years, whose address is Elberta, Baldwin County, Alabama.
2. That your complainant and respondent were lawfully married on or about to-wit: July 23, 1953, in Pascagoula, Mississippi, and of this marriage there are two children, John, four years of age and William, three years of age.
3. Your Complainant further avers and alleges that said respondent has been guilty of adultery with divers parties and persons whose names to your complainant are unknown.

The premises considered, your complainant makes the said Josephine Seitz 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 subpoena to be issued, directed to the said Josephine Seitz, commanding her to answer, plead or demur to this Bill of Complaint within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from the respondent; and that your Honor will grant such other, further or different relief as unto your Honor may seem just and proper, and your complainant will ever pray.

Arthur C. Johnson
Solicitor for Complainant