4665

ORAL DEPOSITION

Printed by The Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

ROSE MARY TSILOS COMPLAINANT

vs.

MICHAEL G. TSILOS RESPONDENT

I, Vera Daniels

as Register and Commissioner

have called and caused to come before me Betty Jane Douglas

witness named in the requirement for Oral Examination, on the 25th day of September 19 59, at the office of James A. Brice, Attorney at Law in Foley, Alabama, and having first sworn said witness to speak the truth, the whole truth, and nothing but the truth, the said Betty Jane Douglas doth depose and say as follows:

My name is Betty Jane Douglas. I am a bona fide resident citizen of Baldwin County, Alabama, and I have been such for more than one year prior to this date. I know Rose Mary Tsilos and Michael G. Tsilos. I know that they were married on November 11, 1957, and that they are still lawfully married. I know there have been two children born of said marriage; Helen Mary Tsilos, now 22 months old, and Carmen Dawn Tsilos, now 8 months old. I know that Michael G. Tsilos left Rose Mary Tsilos prior to the birth of the youngest child when he found out that she was in a family way on the 3rd day of May, 1958. I know that he has in no way furnished them any support since that time and I do not know where he is.

Further deponent saith not.

Betty Jane Douglas
BETTY JANE DOUGLAS

ORAL EXAMINATION

Printed by The Baldwin Times

I, Vera Daniels as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness ____ and read over to her and she signed the same in the presence of myself and James A. Brice at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ____ or had proof made before me of the identity of said witness ____; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said court.

Given under my hand and seal, this 25th day of September, 1959.

Vera Daniels (L. S.)

No. ____ Page ____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

ROSE MARY TSILOS
COMPLAINANT

vs.

MICHAEL G. TSILOS
RESPONDENT

ORAL DEPOSITION

Filed 6-2-62, 19.62

Register.

RECORDED IN ____ Record

Vol. ____ Page ____

Register.

ORAL DEPOSITION

Printed by The Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

ROSE MARY TSILOS COMPLAINANT

vs.

MICHAEL G. TSILOS RESPONDENT

I, Vera Daniels

as Register and Commissioner

have called and caused to come before me Rose Mary Tsilos

witness named in the requirement for Oral Examination, on the 25th day of September 1959, at the office of James A. Brice, Attorney at Law in Foley, Alabama, and having first sworn said witness to speak the truth, the whole truth, and nothing but the truth, the said Rose Mary Tsilos doth depose and say as follows:

My name is Rose Mary Tsilos. I am a bona fide resident citizen of Baldwin County, Alabama, and I have been such for more than one year prior to this date. I am the Complainant in this cause and I was married to Michael G. Tsilos on November 11, 1957, at Clyde, Michigan, and we are still lawfully married. My husband, so far as I know, is residing in Detroit, Michigan. There have been two children born of our marriage; Helen Mary Tsilos, now 22 months old, and Carmen Dawn Tsilos, now 8 months old. My husband left me prior to the birth of our youngest child when he found out that I was in a family way on the 3rd day of May, 1958. He has in no way furnished us any support since that time and I do not know where he is.

Further deponent saith not.

Rose Mary Tsilos
ROSE MARY TSILOS

ORAL EXAMINATION

Printed by The Baldwin Times

I, Vera Daniels as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness ____ and read over to her and she signed the same in the presence of myself and James A. Brice at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ____ or had proof made before me of the identity of said witness ____; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said court.

Given under my hand and seal, this 25th day of September, 1959.

Vera Daniels (L. S.)

No. ____ Page ____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

ROSE MARY TSILOS, COMPLAINANT

vs.

MICHAEL G. TSILOS, RESPONDENT

ORAL DEPOSITION

Filed ____, 19____

____, Register.

RECORDED IN

____ Record

Vol. ____ Page ____

____, Register.

LAW OFFICES
JAMES A. BRICE
FOLEY, ALABAMA

JAMES A. BRICE
RICHARD C. LACEY

P. O. BOX 298
WHITEHALL 3-3601

July 28, 1959

Mrs. Alice J. Duck
Circuit Clerk
Bay Minette, Alabama

Dear Mrs. Duck:

Please find enclosed suit against Michael G. Tsilos.

Please have Mr. Tsilos served by registered mail at 1616 Merrick Street, Apartment "A", Detroit, Michigan.

Thank you very much.

Sincerely,

Richard C. Lacey

RICHARD C. LACEY

RCL:jcp

Enclosure

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 4665

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Michael G. Tsilos

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

Michael G. Tsilos, Defendant

by Rose Mary Tsilos

_____, Plaintiff

Witness my hand this 30 day of July 1959

Reuben J. Renck, Clerk

ROSE MARY TSILOS, COMPLAINANT	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY
VS	)	
MICHAEL G. TSILOS, RESPONDANT	)	

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

Comes the Complainant, Rose Mary Tsilos, and represents and shows unto this Honorable Court as follows:

1. That she is a bona fide resident citizen of Baldwin County, Alabama and has been such for more than one year next preceeding the filing of this Bill of Complaint; that Michael G. Tsilos, the Respondant in this cause, is over the age of twenty-one years and a resident citizen of Detroit, Wayne County, Michigan, as far as your complainant can ascertain.

2. That on, to-wit: the 11th day of November 1957, your complainant and the respondant were intermarried at Clyde, Michigan, and that your complainant and the respondant are still lawfully married.

3. That there has been born of said marriage two children, whose names and ages are, respectively: Helen Mary Tsilos, age seventeen months; and Carmen Dawn Tsilos, age three months.

4. Your complainant further avers that said respondant abandoned and left the complainant and the said minor children on the 3rd day of May, 1958, and ever since they have lived seperate and apart. Your complainant further avers that said respondant has in no way contributed to the support of said complainant or said minor children, and that his acts of abandonment and non-support were not justified nor were they provoked by complainant.

PRAYER FOR PROCESS AND RELIEF

The Premises Considered, your complainant prays that Michael G. Tsilos be made a party respondant to this cause by the usual process of this Honorable Court, requiring him to 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 complainant be granted a divorce from the respondant; and that the complainant be granted the care, custody, and control of the two minor children of the marriage. Should your complainant be mistaken in the relief prayed for, that she be granted such other, further, different, and general relief to which she may be entitled and as in duty bound shewill ever pray.

James A. Brice

JAMES A. BRICE

Richard C. Lacey

RICHARD C. LACEY

SOLICITORS FOR COMPLAINANT

[illegible] TRIBOS,

CONTINUED

TO

[illegible] G. [illegible],

PLAINTIFF

IN THE [illegible]

[illegible] COUNTY, [illegible]
IN EQUITY

[illegible] COUNTY, [illegible],
[illegible], IN EQUITY SITTING:

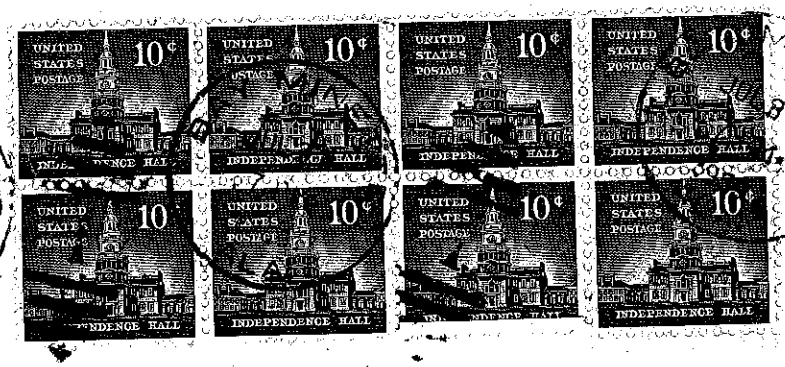
[illegible] on the [illegible] day, [illegible] Tailor, and on [illegible] date [illegible] [illegible] and [illegible]:

1. [illegible] the [illegible] [illegible] [illegible]

4665

ALICE J. DUCK, Circuit Clerk
BALDWIN COUNTY
BAY MINETTE, ALA.

BAY MINETTE
JUL 31
7 PM
1959
ALA.



CERTIFIED
Nº 676558
MAIL

Certified

For Delivery Only To Person
To Whom Addressed

Return Receipt Requested

Mr. Michael Tsilos,
1616 Merrick Street, Apt. A
Detroit, Michigan

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

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

POSTMARK OF DELIVERING OFFICE

INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

RETURN TO

REGISTERED NO.	NAME OF SENDER Alice J. Duck, Register
CERTIFIED NO. 676558	STREET AND NO. OR P. O. BOX Box 239
INSURED NO.	CITY, ZONE AND STATE Bay Minette, Alabama

C55—16—71548-4

POD Form 3811 Jan. 1958

4665

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Deliver *ONLY* to addressee ☐ Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE *(must always be filled in)*

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED	ADDRESS WHERE DELIVERED *(only if requested in item #1)*

C55—16—71548-4 GPO

No. 676558

RECEIPT FOR CERTIFIED MAIL—20¢

SENT TO

Mr. Michael Tsilos,

STREET AND NO.

1616 Merrick Street, Apt. A

CITY AND STATE

Detroit, Michigan

POSTMARK OR DATE

If you want a return receipt, check which ☐ *10¢ shows to whom and when delivered* ☐ *35¢ shows to whom, when, and address where delivered*

If you want restricted delivery, check here ☐ *50¢ fee*

FEES ADDITIONAL TO 20¢ FEE

POD Form 3800
Jul 1957

SEE OTHER SIDE

JAMES A. BRICE
ATTORNEY AT LAW
FOLEY, ALABAMA

POST OFFICE BOX 298 WHITEHALL 3-3601

February 2, 1960

Mrs. Alice J. Duck
Register in Equity
Bay Minette, Alabama

Re: Rose Mary Tsilos
vs: Michael G. Tsilos
Equity No. 4665

Dear Mrs. Duck:

After the above case was dismissed by mistake, I wrote Judge Hall requesting that the case be reinstated and explained the reason for the slowness in progress.

Please note the enclosed demand from the Sheriff's Office and accordingly advise me of the status of this case.

Thank you.

Sincerely yours,

James A. Brice

JAB/vd

Enclosure

Taylor Wilkins
Sheriff

SHERIFF'S OFFICE
Baldwin County
Bay Minette, Ala.

J. D. Horn
Chief Deputy

1/29/69

Bruce & Lacey
Foley, Ala.

Rose May Isles

VS.

Michael D. Isles

Court Equity No. 4665

1. ( ) On _____ you advised this office defendant has made arrangements to settle. Since that time we have heard nothing further from you.

2. ( ) Please furnish us with the address of the _____ so that we might contact him regarding this execution.

3. ( ) If defendant has settled please send us your check for _____ to cover court cost so that we may make our return to the court.

4. ( ) After a thorough search I find defendant has no property on which we can levy. However, if we are in error please advise and another attempt to levy will be made, otherwise this execution will be returned "No Property Found."

5. (X) We hold execution for costs against your client the Pltf in the amount of $26.88. We shall appreciate it if you will advise your client to pay those costs into this office within the next ten days. If payment is not received within the time stipulated we shall be compelled to levy on property belonging to your client for the satisfaction of the amount due.

6. ( ) We have an execution in the above styled case in which you represent the plaintiff. We will greatly appreciate it if you will advise us if there is any property known to you belonging to the defendant in this county in order that we may levy.

7. ( ) Please let us hear from you not later than _____ otherwise we must return this writ to court. This means, of course, your client will be taxed with the costs.

Yours very truly,

Taylor Wilkins, Sheriff

By: Bruce Lindsey
Clerk

Decree Pro Confesso of Publication.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

No. 4665 _____ Term, 19____

ROSE MARY TSILOS Complainant

MICHAEL TSILOS Defendant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 8th day of October, 1959, in the THE ONLOOKER a newspaper published in Foley, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 8th day of October 1959, and

And it now further appearing to the Register Alice J. Duck, that the said Michael Tsilos

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant____, ordered and decreed by the Register Alice J. Duck that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Michael Tsilos

This 22 day of June 1960

Alice J. Duck Register.

THE FOLEY ONLOOKER BALDWIN NEWS-HERALD

FOLEY, ALA. Oct 29 1959

HOWELL PUBLISHING CO.

HIGH QUALITY JOB PRINTING

Mrs. Alice J. Veach, Register
Bay Minette Ala

Brought Forward

Oct 8-15-22-29

Tsilos vs. Tsilos $10.92

NOTICE TO NON-RESIDENT

Rose Mary Tsilos, No. 4665 vs. Michael G. Tsilos. The State of Alabama, Baldwin County. Circuit Court, in Equity. This the 3rd day of October, 1959.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Rose Mary Tsilos that the Defendant Michael G. Tsilos is a non-resident of the State of Alabama and his whereabouts or Postoffice cannot be ascertained 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 Onlooker, a newspaper published in Foley, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Michael G. Tsilos the said Respondent to answer or demur to the Bill of Complaint in this cause by the 3rd day of November, 1959, or after thirty days therefrom a decree Pro Confesso may be taken against him.

Alice J. Duck, Register.
Brice & Lacey, Solicitors for Complainant.

(4t, Oct. 8, 15, 22, 29)

AFFIDAVIT OF PUBLICATION

I, Edith Howell

Sec of The Onlooker, published at Foley, Ala., do solemnly swear that a copy of the above notice, as per clipping attached, was published once each week in the regular and entire edition of said newspaper, and not in any supplement thereof, for 4 consecutive weeks, commencing with the issue dated Oct. 8, 1959, and ending with the issue dated Oct. 29, 1959

Edith Howell

Subscribed and sworn to before me this 29th day of October, 1959.

Mamie Hunter Duck

Notary Public.

MOTION FOR DECREE PRO CONFESSO ON PUBLICATION

Rose Mary Tsilos
Complainant
vs.

Michael Tsilos
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
4665

Motion is hereby made for a Decree Pro Confesso against Michael Tsilos, respondent in the above 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 respondent 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 21st day of June, 1960.

James A. Brown
Solicitor for Complainant

FILED
JUN 21 1960
ALICE J. DUCK, CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 4665

_____ TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Michael G. Tsilos

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

Michael G. Tsilos, Defendant

by Rose Mary Tsilos

_____, Plaintiff

Witness my hand this 30 day of July 1959

Alice J. Lewis, Clerk

138

ROSE MARY TSILOS,	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA
VS	)	IN EQUITY
MICHAEL G. TSILOS,	)	
RESPONDANT	)	

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

Comes the Complainant, Rose Mary Tsilos, and represents and shows unto this Honorable Court as follows:

1. That she is a bona fide resident citizen of Baldwin County, Alabama and has been such for more than one year next preceeding the filing of this Bill of Complaint; that Michael G. Tsilos, the Respondant in this cause, is over the age of twenty-one years and a resident citizen of Detroit, Wayne County, Michigan, as far as your complainant can ascertain.

2. That on, to-wit: the 11th day of November 1957, your complainant and the respondant were intermarried at Clyde, Michigan, and that your complainant and the respondant are still lawfully married.

3. That there has been born of said marriage two children, whose names and ages are, respectively: Helen Mary Tsilos, age seventeen months; and Carmen Dawn Tsilos, age three months.

4. Your complainant further avers that said respondant abandoned and left the complainant and the said minor children on the 3rd day of May, 1958, and ever since they have lived seperate and apart. Your complainant further avers that said respondant has in no way contributed to the support of said complainant or said minor children, and that his acts of abandonment and non-support were not justified nor were they provoked by complainant.

PRAYER FOR PROCESS AND RELIEF

The Premises Considered, your complainant prays that Michael G. Tsilos be made a party respondant to this cause by the usual process of this Honorable Court, requiring him to 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 complainant be granted a divorce from the respondant; and that the complainant be granted the care, custody, and control of the two minor children of the marriage. Should your complainant be mistaken in the relief prayed for, that she be granted such other, further, different, and general relief to which she may be entitled and as in duty bound she will ever pray.

JAMES A. BRICE

RICHARD G. LACEY

SOLICITORS FOR COMPLAINANT

4665

FILED

JUL 30 1959

ALICE L. DUCK, CLERK
REGISTER

ROSE MARY TSILOS,	)	IN THE CIRCUIT COURT OF
COMPLAINANT,	)	BALDWIN COUNTY, ALABAMA
VS.	)	
MICHAEL G. TSILOS,	)	IN EQUITY.
RESPONDENT.	)	

Now comes the Complainant in the above styled cause and shows to the Court that, as shown by the file in said case, the Circuit Clerk of Baldwin County, Alabama, sent complaint by registered mail at the last known address of the Respondent, Michael G. Tsilos, which was 1616 Merrick Street, Apartment "A", Detroit, Michigan; that the registered package was returned to the Circuit Clerk not delivered.

Complainant further shows to the Court that she has no knowledge of the present whereabouts of the said Respondent.

WHEREFORE, Complainant prays that the Court will make and enter an order of publication to said Michael G. Tsilos as a non-resident Respondent as provided for by the Statutes of Alabama.

JAMES A. BRICE

RICHARD C. LACEY

ATTORNEYS FOR COMPLAINANT

FILED
OCT 5 1959
ALICE J. DUCK, CLERK
REGISTER

A F F I D A V I T

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me, Richard C. Lacey, a Notary Public, in and for said County in said State, personally appeared Rose Mary Tsilos, who is known to me, and who, being by me first duly sworn, deposes and says: That she is the Complainant in the certain action pending in the Circuit Court of Baldwin County, Alabama, wherein Rose Mary Tsilos is the Complainant and Michael G. Tsilos is the Respondent; that the Circuit Clerk of Baldwin County, Alabama, sent complaint by registered mail at the last known address of said Respondent which was 1616 Merrick Street, Apartment "A", Detroit, Michigan; that the registered package was returned to the Circuit Clerk not delivered; that the affiant has no knowledge of the whereabouts of the said Michael G. Tsilos.

Rose Mary Tsilos
ROSE MARY TSILOS

Sworn to and subscribed before me on
this 25th day of September, 1959.

Richard C. Lacey
Notary Public, Baldwin County, Alabama

FILED
1959
ALICE J. DUCK, CLERK & REGISTER

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

ROSE MARY TSILOS

No. 4665

vs.

MICHAEL G. TSILOS

The State of Alabama,

Baldwin County.

Circuit Court, in Equity

This the 3rd day of October, 1959

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

that the Defendant MICHAEL G. TSILOS

is a non-resident of the State of Alabama ~~and his whereabouts or Postoffice cannot be ascertained~~

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~~ Onlooker, a newspaper published in ~~Bay Minette~~ Foley, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Michael G. Tsilos the said ~~Respondent~~

to answer or demur to the Bill of Complaint in this cause by the 3rd day of November 1959, or after thirty days therefrom a decree Pro Confesso may be taken against him

Register.

Brice & Lacey,
Solicitors For Complainant