

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 _____

John William Adams

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.....

John William Adams....., Defendant.....

by.....

Bola Adams....., Plaintiff.....

Witness my hand this *7th* day of *June* 19 *56*

Reice J. Drake....., Clerk

ZOLA ODOM)
 COMPLAINANT)
VS.))
TOM WILLIAM ODOM)
 RESPONDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

CASE NO. _____

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

Your complainant ZOLA ODOM respectfully represents
and shows unto your Honor:

1. That the complainant is over the age of twenty-
one years and is a resident of Baldwin County, Alabama, and
has been a bona fide resident of said County and State for more
than one year preceding the filing of this bill of complaint;
that TOM WILLIAM ODOM, the respondent, is over the age of twenty-
one years and resides at Big Springs, Texas.

2. That your complainant and respondent were law-
fully married on or about, to-wit: June 9, 1954, at Lucedale,
Mississippi, and there are no children of this union.

3. Your complainant avers and alleges that the said
respondent has, since her said marriage with him, become addicted
to habitual drunkenness, and that said habit has continued to the
filing of this bill.

The premises considered, your complainant makes the
said Tom William Odom a party respondent to this bill of complaint
and in order that complainant may have the relief herein prayed
for, may it please your Honors to cause the State's writ of sub-
poena to be issued, directed to the said Tom William Odom, com-
manding him to ~~read~~, answer or demur within the time allowed by
law; and that on a final hearing of this cause that Your Honor
will enter a decree divorcing your complainant from the said re-
spondent and that Your Honor will grant such other, further or
different relief as unto your Honor may seem just and proper.


SOLICITOR FOR COMPLAINANT

RESPONDENT'S ADDRESS:

Care of Settles Hotel Coffee Shop
Big Springs, Texas

ARTHUR C. EPPERSON

ATTORNEY AT LAW

POPPE BUILDING

FOLEY, ALABAMA

June 26, 1956

Mrs. Alice J. Duck
Clerk of the Circuit Court
Bay Minette, Alabama

Dear Mrs. Duck:

I would appreciate your obtaining service by registered mail on the respondent in the case of which I am enclosing the complaint.

In case number 2851, lawside, of W. M. Barner, Jr. vs. Leroy Page, Jr. on which return was made the defendant was not found, the defendant is working for Dr. Gayle in Fairhope, Alabama, and I would appreciate also getting the Sheriff to serve him there before he changes jobs.

Very truly yours,


Arthur C. Epperson

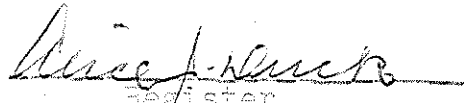
ACE/vh

ZOLA ODOM)
COMPLAINANT)
VS.)
TOM WILLIAM ODOM)
RESPONDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
CASE NO. _____

In this cause it appearing to the Register from the affidavit of Arthur C. Epperson, Solicitor of Record for the Complainant, that the Respondent is a non-resident of the State of Alabama and his address is unknown or if a resident of the State of Alabama, conceals himself so that process cannot be served and further that in the belief of the affiant the respondent is over the age of twenty-one years, it is therefore ordered by the Register that publication be made once a week for four consecutive weeks, in the Onlooker, a newspaper published in Baldwin County, Alabama, requiring the said Tom William Odom to plead, answer or demur to the bill of complaint in this cause by the 13th day of August, 1956, or, in default thereof, thirty days thereafter a decree pro confesso may be taken against the said respondent.

Done at Office this the 9th day of July, 1956.


Register.

Arthur C. Epperson
Attorney for Complainant
Foley, Alabama

ZOLA ODOM
COMPLAINANT
VS.
TOM WILLIAM ODOM
RESPONDENT

IN THE CIRCUIT COURT OF
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Arthur C. Epperson
Attorney for Complainant
Foley, Alabama

Register.

Arthur C. Epperson
July 20 1956

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

ZOLA ODOM
COMPLAINANT

VS.

TOM WILLIAM ODOM
RESPONDENT

BILL OF COMPLAINT

FILED

JUN 22 1956

ALEX J. ROCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

ZOLA ODOM)
COMPLAINANT)
VS.)
TOM WILLIAM ODOM)
RESPONDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
CASE NO. _____

Personally appeared before me the undersigned authority, Arthur C. Epperson, Solicitor of Record for the complainant in the above entitled cause, who being duly sworn, deposes and says that he is informed and verily believes that Tom William Odom, the Respondent in the above entitled cause is a non-resident of the State of Alabama, and whose address is unknown or if a resident of Alabama, conceals himself so that process cannot be served, and that respondent in the belief of the affiant is over the age of twenty-one years.


AFFIANT

Sworn to and subscribed before me, this the 11 day
of July, 1956.


ALICE J. DUCE, CLERK OF THE
CIRCUIT COURT, BALDWIN COUNTY
ALABAMA.


ZOLA ODOM
COMPLAINANT)
VS.)
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RESPONDENT)

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AFFIANT

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ALICE J. DUCK, CLERK OF THE
CIRCUIT COURT, BALDWIN COUNTY
ALABAMA.