

3831

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WELBORN DENT, to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by LUVIERNE DENT as Complainant and against WELBORN DENT as Respondent.

WITNESS my hand this the 23 day of July, 1956.

Register.

LUVIERNE DENT
 COMPLAINANT

VS

WELBORN DENT
 RESPONDENT

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

CASE NO. _____

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

Your Complainant, Luvierne Dent, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and is a bona fide resident of Baldwin County, Alabama, and has been more than two years next preceeding, the Respondent is over the age of 21 and a resident of Baldwin County, Alabama, but temporarily residing at Parchman, Mississippi., Front Unit.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi on December 23, 1952 and lived together as husband and wife in Baldwin County, until December 27, 1954.

3.

That on December 27, 1954, while your Complainant and the Respondent were living together as husband and wife, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

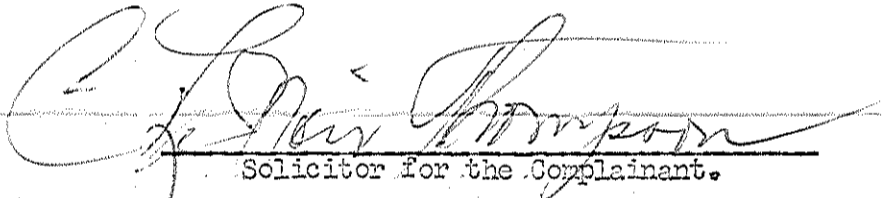
4.

There was born as fruits of this marriage between the Complainant and the Respondent one child, Dewayne W. Dent, age about two and a half years,

and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Welborn Dent, party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to the Complainant the care, custody and control of the minor child, Dwayne W. Dent, age about two and a half years; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant.