

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 3994

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~XXXXXXXXXX~~ R.D. Ward

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-----

R.D. Ward-----, Defendant-----

by----- ~~Hazel Laverne Ward~~-----

-----, Plaintiff-----

Witness my hand this 11th day of March 19 57

[Handwritten Signature]-----, Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

HAZEL LEVERNE WARD

Plaintiffs

vs.

R.D. WARD

Defendants

Summons and Complaint

Filed March 14, 1957 19__

Alice J. Duck 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

STATE OF ALABAMA)

BALDWIN COUNTY)

HAZEL LAVERNE WARD,)

Complainant,)

vs.)

R. D. WARD,)

Respondent.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

To the Honorable Judge of the Circuit Court of Baldwin County,

Sitting in Equity:

Comes now the Complainant, HAZEL LAVERNE WARD, humbly complaining of the Respondent, R. D. WARD, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, Hazel Laverne Ward, 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 State for more than one year next preceding the filing of this Bill of Complaint; that Respondent is over twenty-one years and is residing in San Antonio, Florida.

SECOND: That your Complainant and Respondent were married on or about, to-wit: July 2, 1949, at Lucedale, Mississippi.

THIRD: That Complainant further avers and shows unto your Honor that the said Respondent, R. D. Ward, voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, on to-wit: January 15, 1955, and since that time your Complainant and Respondent have at no time lived together, nor have they in any way recognized each other as husband and wife.

FOURTH: Your Complainant would further aver and show unto your Honor that there were three children born to the union of the Complainant and Respondent which are as follows: A girl, Janice Dianne Ward, aged eight years, Georgia Ward, a girl, aged 7, and William D. Ward, a boy, aged 16 months; said children are now in the care, custody and control of the Complainant, their mother, who is a fit and proper person to be awarded the permanent care, custody and control of said minor children.

PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said R. D. Ward, be made party Respondent to this her Bill of Complaint and that a summons be issued and served upon him as required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said Decree the Complainant will be granted the right to again contract marriage; that in and by virtue of said decree the Complainant will be awarded the permanent care, custody and control of the said minor children, Janice Dianne Ward, Georgia Ward, and William D. Ward.

Complainant prays all other further or general relief to which she may be entitled, the premises considered and she will ever pray, etc.

James A. Hendrix

IN THE CIRCUIT COURT OF
WILMINGTON COUNTY, VIRGINIA

IN EQUITY.

BILL OF COMPLAINT.

JANICE DIANNE WARD,
Complainant,

vs.
R. D. WARD,
Respondent.

FILED
MAY 13 1964
WILMINGTON COUNTY, VIRGINIA

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Moore Ptg. Co.

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Baldwin County.



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R.D. Ward
....., Defendant.....

by..... Hazel Laverne Ward.....
....., Plaintiff.....

Witness my hand this 14th day of March 1957

Alice J. Duck....., Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

HAZEL LEVERNE WARD

Plaintiffs

vs.

R. D. WARD

Defendants

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Complainant,)

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