

GEORGE S. JACKSON,
Complainant,
vs.
ALTA DEE JACKSON,
Respondent.

¶ IN THE CIRCUIT COURT OF
¶ BALDWIN COUNTY, ALABAMA
¶ IN EQUITY
¶
¶ NO. 4025

DEMURRER

Comes now the Respondent in the above styled cause by her Solicitors and demurs to the Bill of Complaint heretofore filed against her and assigns the following separate and several grounds in support thereof:

1. There is no equity in the bill.
2. The Complaint is in the alternative.
3. The Complainant fails to offer to do equity in that he fails to offer to support the Respondent or their two minor children.

CHASON & STONE

By:



GEORGE S. JACKSON,		IN THE CIRCUIT COURT OF
Complainant,	:	MOBILE COUNTY, ALABAMA.
-vs-		IN EQUITY.
ALTA DEE JACKSON	:	NO. _____
Respondent.		

NON-RESIDENCY AFFIDAVIT

STATE OF ALABAMA |
COUNTY OF MOBILE |

Before me, the undersigned authority in and for said State and County, personally appeared George S. Jackson who was made known to me, and who by me first being duly sworn on oath deposes and says as follows:

That I am the husband of the Respondent herein and I am the Complainant in the above styled cause. The Respondent is over the age of twenty-one years and she is a non-resident of the State of Alabama. She is a resident of the State of California and her place of residence and post office address is, 34 Adelaide Drive, Martinez, California.

George S. Jackson
AFFIANT

Sworn and subscribed to before me on
this the 2nd day of May 1957.

William S. Taylor
NOTARY PUBLIC, MOBILE COUNTY, ALABAMA.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 4025

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Alta Dee Jackson

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

Alta Dee Jackson, Defendant

by George S. Jackson, Plaintiff

Witness my hand this 4th day of May 1957

_____, Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

GEORGE S. JACKSON

Plaintiffs

vs.

ALTA DEE JACKSON

Defendants

Summons and Complaint

Filed 5/4/57 19

Alice J. Duck Clerk

William Grayson
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

GEORGE S. JACKSON,
Complainant,

-vs-

ALTA DEE JACKSON,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN
~~XXXXXX~~ COUNTY, ALABAMA

IN EQUITY:

NO. 4025

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and unto
this Honorable Court as follows:

ONE

Complainant is the husband of the Respondent and they
were married to each other on January 1, 1950 in Reno, Nevada.
Both the Complainant and the Respondent are each over the age
of twenty-one years. The Complainant is a bona-fide resident
citizen of the State of Alabama, and has been such for more than
one year next preceding the filing of the Bill of Complaint herein.
The Respondent is a non-resident of the State of Alabama, she is
a resident of Martinez, California and her place of residence and
post office address is 34 Adelaide Drive. There are two minor
children as issue of their marriage, Carolyn Kay Jackson, age five
and Kerry Harland Jackson, age three years.

TWO

The Respondent has committed actual violence upon the
person of the Complainant, attended with danger to his life or
health, or from her conduct there is reasonable apprehension
of such violence.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of
this cause, will make the said Alta Dee Jackson, party-respondent
hereto, and will cause her to appear, plead, answer or demur hereto,
within the time allowed by law and the rules of this Honorable
Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant him an absolute divorce from the bonds of matrimony with the Respondent, and Complainant further prays for such other, further and different relief as in equity she may be due, and as in duty bound he will ever pray, etc.

William L. Mason
SOLICITOR FOR COMPLAINANT.

Respondent may be served by Registered Mail:

34 Adelaide Drive
Martinez, California