

THE STATE OF ALABAM	ΛN	

CIRCUIT COURT, BALDWIN COUNTY

Mary E. Huerner

BALDWIN COUNTY

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TO ANY SHERIFF OF THE STATE OF ALABAMA:

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the	Circuit Court of	Baldwin C	ounty, State o	of Alabama,	at Bay Minett	e, against	· · · · · · · · · · · · · · · · · · ·	
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by .		<u> </u>	. Jo	ohn H. Hue	rner			
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JOHN H. HUERNER.

Complainant,

-vs-

MARY E. HUERNER,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Comes your Complainant, John H. Huerner, and files this his Bill of Complaint for Divorce against Mary E. Huerner, and respect-fully represents and shows unto your Honor:

- 1. That the Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such a bona fide resident citizen for more than one year next preceding the filing of this Bill of Complaint; that Mary E. Huerner is over the age of twenty-one years and that she is a non-resident of the State of Alabama, her present address being 420 Maycox, Norfolk, Virginia.
- 2. That the Complainant and the Respondent were lawfully married in, to-wit, October, 1955.
- 3. Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant more than one year next preceding the filing of this Bill of Complaint; since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.
- 4. Complainant further shows unto the Court that there are no children of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Mary E. Huerner be made a party defendant to this cause by the usual process of this Honorable Court, by service by Registered Mail, requiring her 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 Respondent. Should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, different and general relief to which he may be entitled and as in duty bound, he will ever pray.

Solicitor for Complainant.

LAW OFFICE OF

FOREST A. CHRISTIAN FOLEY, ALABAMA July 12, 1957

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

> Re: John H. Huerner, Complainant Vs: Mary E. Huerner, Respondent In Equity

Dear Mrs. Duck:

Kindly enter my name as solicitor for the respondent in this divorce action.

Yours very truly

FOREST A. CHRISTIAN

CECIL G. CHASON

attorney-at-Law FOLEY. ALABAMA June 26, 1957

Mrs. Alice J. Duck, Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint for divorce of John H. Huerner vs Mary E. Huerner.

Yours very truly,

C. G. Chason

CGC:dc

Encl.