

4334

386 FAIRHOPE AVE.

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.
July 16, 1958

Dear Miss Alice:

Enclosed you will find a Bill of Complaint for a divorce. The defendant will have to be served by registered mail at the following address 7351 Vincennes Ave. Chicago 21. Illinois.

John

WILLIE BAKER)	IN THE CIRCUIT COURT OF
Complainant)	BALDWIN COUNTY, ALABAMA
-Vs-)	IN EQUITY
LIZZIE BAKER)	
Respondent)	

BILL OF COMPLAINT

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

Your Complainant, Willie Baker, respectfully shows unto this
Honorable Court and your Honor as follows:

I

That the Complainant is a resident of Baldwin County, Alabama,
and has been a resident for more than one year next, preceeding
the filing of this his Bill of Complaint; that your Complainant
is over the age of twenty-one years; that the Respondent Lizzie
Baker, is over the age of twenty-one years and her address is 7351
Vincennes Avenue, Chicago, 21, Illinois.

II

That your Complainant and the Respondent were married at Mo-
bile, Alabama , on the 11th day of August, 1943, and lived to-
gether as husband and wife until on to-wit: the 7th day of January,
1947.

III

That on to-wit; the 7th day of January, 1947, the Respondent
voluntarily abandoned the bed and board of the Complainant, and
since which time the Complainant and Respondent have not lived to-
gether nor any way recognized each other as husband and wife.

PRAYER FOR PROCESS AND RELIEF

WHEREFORE, the premises considered, your Complainant makes
the said Lizzie Baker the party respondent to this Bill of Com-
plaint, and in order that the Complainant may have the relief here-
inafter prayed for, may it please your Honor to cause the States
Writ of Subpoena to issue, directed to the said Lizzie Baker, com-
manding her to answer, plead or demur to this Bill of Complaint

within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your Complainant from the said Respondent, granting the Complainant the right to remarry; and that your Honor will grant such other further and different relief as unto your Honor may seem just and proper and as in equity your Complainant will ever pray.

Willie Baker
Willie Baker

John V. Duck
Solicitor for Complainant.

Filed July 17, 1958
John V. Duck, Reg.

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 Lizzie Baker

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

Lizzie Baker....., Defendant

by

Willie Baker....., Plaintiff

Witness my hand this 17 day of July 1958

Bessie D. Duncanson....., Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

WILLIE BAKER

Plaintiffs

vs.

LIZZIE BAKER

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

FILED

JUL 17 1958

ALICE L. DECK, Register

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

WILLIE BAKER
Complainant

-VS-

LIZZIE BAKER
Respondent


IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

AMENDED BILL OF COMPLAINT

COMES Now your Complainant, Willie Baker, in the above style cause and amends this his Bill of Complaint as follows:

That the Respondents name be changed from Lizzie Baker to Alice McGrew Baker.

*filed Aug. 6, 1958
Alice J. Duck, Reg.*


~~Solicitor for Complainant~~

WILLIE BAKER
Complainant

-VS-

LIZZIE BAKER
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA ,
IN EQUITY

* * * * *

AMENDED BILL OF COMPLAINT

FILED

AUG 6 1958

ALICE J. DUCK, Register

*copy
mailed cert mail*

[Faint, mostly illegible text and markings, possibly bleed-through or a second page of the document.]