

4381

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons NOVELLA PEARS 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 WALTER PEARS, as Complainant and against Novella Pears, as Respondent.

WITNESS my hand this the 16 day of September, 1958.

Deice J. Gussie
Register

WALTER PEARS
COMPLAINANT
VS
NOVELLA PEARS
RESPONDENT

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

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

Your Complainant, Walter Pears, respectfully represents unto your Honor as follows:

1.

That your Complainant and Respondent are both over the age of 21 years and are bona fide resident citizens of Baldwin County, Alabama.

2.

That your Complainant and Respondent were married to one another at Lucedale, Mississippi, on October 14, 1955, and lived together as husband and wife until on to-wit, September 11, 1958.

3.

The Complainant alleges that the Respondent committed adultery on to-wit, September 11, 1958, with persons whose names to your Complainant are unknown.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said Novella Pears, party Respondent to this cause of action, requiring her 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 prays that on a hearing hereof, your Honor will enter an order and decree granting him an absolute decree of divorce forever barring the bonds of matrimony existing between him and the Respondent. Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.

filed Sept. 15, 1958
Alice J. Luck, Req.
Executed Sept. 24, 1958

Wiltors & Brantley

BY: *Richard M. Brantley*
Solicitors for the Complainant

70.4381

Received: 16 day of Sept 1958

at on 24 day of Sept 1958

Served a copy of the within Bill of Complaint

Novella Pears

service on Novella Pears

TAYLOR WILKINS, Sheriff

By *[Signature]* D. S.

1 mi. S. Dispatch

Sheriff claims 56 miles at

Ten Cents per mile Total \$ 5.60

TAYLOR WILKINS, Sheriff

BY *[Signature]*
DEPUTY SHERIFF

WALTER PEARS

COMPLAINANT

VS

NOVELLA PEARS

RESPONDENT

FILED

Defendant lives in
Daphne near Stage
McCrays Store

FILED

SEP 15 1958

ALICE J. DUCK, CLERK
REGISTER