4436

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon R. J. OGLES, 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 MARION HELEN MARTIN OGLES, as Complainant and against R. J. OGLES, as Respondent.

WITNESS my hand this the 18 day of Nov, 1958.

Alice J. Huck
Register.

* *

MARION HELEN MARTIN OGLES	*	IN THE CIRCUIT COURT OF
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA.
VS	*	IN EQUITY.
R. J. OGLES	*	CASE NO. _____
RESPONDENT	*	

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

Your Complainant, Marion Helen Martin Ogles, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 18 and a resident of Baldwin County, Alabama, and has been more than two years next preceding; Thr Respondent is over the age of 21, and a resident of the State of Alabama, and has been more than two years next preceding.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on October 25, 1955, and lived together as husband and wife in Alabama until on to-wit, September 15, 1957.

3.

That on to-wit, September 15, 1957, while your Complainant and the Respondent were living together as husband and wife in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

There are no children as fruits of this marriage and no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said R. J. Ogles, party Respondent to this bill of complaint requiring him 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 further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Solicitor for Complainant.

Defendant's present address:
Sgt. R. J. Ogles 1411014
H. S. Co. 333 FMF
c/o F.P.O.
San Francisco, California

4436

MARION HELEN MARTIN OGLES

COMPLAINANT

VS

R. J. OGLES

RESPONDENT

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BILL OF COMPLAINT

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FILED

NOV 18 1958

ALICE J. DUCK, CLERK REGISTER