

JOHN FIEGL,	§	
Complainant	§	IN THE CIRCUIT COURT OF
vs.	§	BALDWIN COUNTY, ALABAMA
JOHANNA M. FIEGL,	§	IN EQUITY
Respondent	§	

Comes your Complainant, John Fiegl, and files this him Bill of Complaint for divorce against Johanna M. Fiegl, and shows unto Your Honor and unto this Honorable Court as follows:

ONE:

That your Complainant and the Respondent are over the age of twenty-one years; that your Complainant is a resident citizen of Baldwin County, Alabama for more than one year next preceding the filing of this Bill of Complaint; and that the Respondent's last known residency was, to the best of his knowledge and belief, Lancaster, New York, and the Respondent's residency is otherwise unknown to him and cannot be ascertained by reasonable effort.

TWO:

That the Complainant and Respondent were married on, heretofore, to-wit, the 31st day of May, 1940 in Lancaster, New York, and lived together as husband and wife until on, to-wit, September, 1955, when, on account of the matters hereinafter complained of, your Complainant lived separate and apart from the Respondent. Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint and that since that time, Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Johanna M. Fiegl be made a party Defendant to this cause by the usual writ or process of this Honorable Court requiring her to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of the Court and the Statutes in such cases made and provided; that upon a final hearing of this cause Your Honor will grant unto Complainant an absolute divorce

from the Respondent and will decree that the parties be allowed to remarry if they see fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.

John Fiegl
COMPLAINANT

STATE OF ALABAMA)
)
BALDWIN COUNTY)

Before me, the undersigned authority, personally appeared John Fiegl, who, being by me first duly sworn, deposes and states that the facts contained in the foregoing are true and correct to the best of his knowledge and belief.

John Fiegl
JOHN FIEGL

Sworn and subscribed to before me this the 16th day of October, 1959.

FILED
OCT 12 1959

ALICE J. DUCK, Registrar

Helen Bailey
NOTARY PUBLIC
BALDWIN COUNTY, ALABAMA

4728

JOHN FIEGL,
Complainant
vs.

JOHANNA M. FIEGL,
Respondant

BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

FILED

OCT 12 1959

WALTER A. DUCK, Register

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STATE OF ALABAMA)
BALDWIN COUNTY)

AFFIDAVIT

Before me, Ernest M. Bailey, Notary Public in and for the State of Alabama, County of Baldwin, personally appeared John Fiegl, who is known to me, and who, being by me first duly sworn, deposes and says:

That he is the Complainant in that certain action pending in the Circuit Court of Baldwin County, Alabama, wherein John Fiegl is the Complainant and Johanna M. Fiegl is the Respondent; that the last known residency of the said Respondent, Johanna M. Fiegl, was, to the best of his knowledge and belief, Lancaster, New York; that the residency of the Respondent, Johanna M. Fiegl, is otherwise unknown to him and cannot be ascertained by reasonable effort; that the Respondent, Johanna M. Fiegl, is over the age of twenty-one years.



JOHN FIEGL

Sworn and subscribed to before me this the 10th day of October, 1959.

Filed 10-12-59



NOTARY PUBLIC

4725

JOHN FIEGL,
Complainant

vs.

JOHANNA M. FIEGL,
Respondent

AFFIDAVIT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED

OCT. 12 1959

ALICE J. DUCK, Register

[Handwritten signature]

LEGAL NOTICE

NOTICE TO NON-RESIDENT

IN THE STATE OF ALABAMA

JOHN FIEGL,
Complainant

§

IN THE CIRCUIT COURT OF

§

BALDWIN COUNTY, ALABAMA

vs.

§

IN EQUITY

JOHANNA M. FIEGL,
Respondent

§

This the 12th day of October, 1959.

In this cause it being made to appear to the Clerk of this Court by the affidavit of John Fiegl that the Defendant, Johanna M. Feigl, is a non-resident of the State of Alabama or else conceals herself so that process of Court cannot be served upon said Respondent and further, that in the belief of said affiant the Defendant is over the age of twenty-one years; it is, therefore, ordered that publication be made in The On-Looker, a newspaper published in Foley, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Johanna M. Fiegl, the said Respondent, to answer or demur to the Bill of Complaint in this cause by the 19th of November, 1959, or after thirty days therefrom a Decree Pro Confesso may be taken against her.

ALICE J. DUCK, REGISTER

ERNEST M. BAILEY
SOLICITOR FOR COMPLAINANT

JOHN FIEGL,
Complainant

vs.

JOHANNA M. FIEGL,
Respondent

NOTICE TO NON-RESIDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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