

IRA McMILLAN,

Complainant,

-vs-

CHESTER WALLACE McMILLAN,

Respondent.

I IN THE CIRCUIT COURT

I OF

I BALDWIN COUNTY, ALABAMA

I IN EQUITY:

I NO.

4758

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and
unto this Honorable Court as follows:

ONE

Complainant is the wife of the Respondent and they were
married to each other on January 12th, 1941 in Pascagoula,
Mississippi. Both the Complainant and the Respondent are
each over the age of twenty-one years and the Complainant is
a bona--fide resident citizen of the State of Alabama and
has been such for more than one year next preceding the filing
of the bill of complaint herein. The Respondent is a
resident of the State of Florida. There are three minor children
as issue of their marriage, Doris Jean McMillan, age sixteen
years, Lula Marie McMillan, age fourteen years, and William
McMillan, age thirteen years.

TWO

The Respondent has voluntarily abandoned the bed and
board of the Complainant for more than one year next preceding
the filing of the bill of complaint herein.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction
of this cause, will make the said Chester Wallace McMillan,
party-respondent hereto, and will cause him to appear, plead,
answer or demur hereto within the time allowed by law and
the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant her an absolute divorce from the bonds of matrimony with the Respondent, and Complainant further prays for such other, further of different relief as inequity she may be due, and as in duty bound she will ever pray, etc.

William Tappan
SOLICITOR FOR COMPLAINANT.

FILED

OCT 30 1959

ALICE J. DUCK, CLERK
REGISTER