

4760

WALTER J. LEE
LAWYER
VAN ANTWERP BLDG.
MOBILE, ALABAMA

November 4, 1959

The Honorable Register
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

RE: EDWARD JAMES O'CONNOR, Complainant, -vs- MURIEL GARRISON
O'CONNOR, A Bill for Divorce

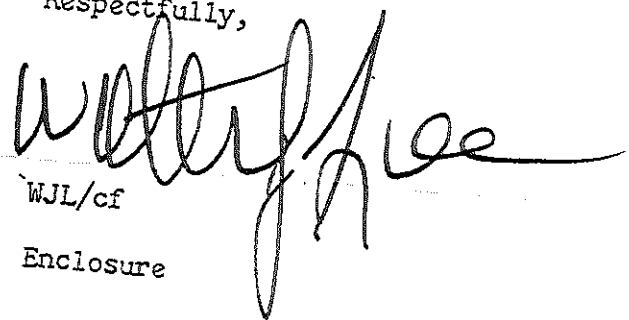
Honorable Sir:

I lodge herewith the Original Bill in the above cause for filing.

I am not forwarding a carbon copy for the Respondent, since I expect to obtain an Answer and Waiver.

If there are any questions concerning this matter, please call me long distance collect to HEmlock 3-5952, Mobile.

Respectfully,



WJL/cf

Enclosure

EDWARD JAMES O'CONNOR,)
Complainant,)
-vs- :
MURIEL GARRISON O'CONNOR,)
Respondent.)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY, NO. _____

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

Comes now, EDWARD JAMES O'CONNOR, Complainant, and respectfully represents:

1) THAT he and the Respondent are each over the age of twenty-one years and that he is a bona fide resident citizen of the State of Alabama, and has been such for a period of more than two years next immediately preceding the filing of this Bill of Complaint, and that the Respondent is a non-resident of the State of Alabama, resident at, to-wit: New York, New York.

2) THAT he is the lawful husband of the Respondent, having been legally married to her on, to-wit: November 26, 1941, at, to-wit: New York, New York.

3) THAT the Respondent voluntarily abandoned his bed and board more than one year next immediately preceding the filing of this bill of complaint, since which time Complainant and Respondent have not lived together, nor in any way recognized each other as husband and wife.

PRAYER FOR PROCESS:

Complainant prays that upon the filing of this Bill of Complaint, proper process issue to Muriel Garrison O'Connor, making her a party respondent and requiring her to appear and plead, answer or demur to the allegations herein within the time required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF:

Complainant prays that upon a final hearing hereof Your Honors will grant to him an absolute divorce from the Respondent, and grant him the right to remarry in the event he should so care; and Complainant prays for such other further and general relief as he may be entitled in the premises and as to Your Honors seems meet and proper. Complainant offers to do equity in this cause.

Edward James O'Connor (Complainant)

Subscribed and sworn to before me this 4th day of November, 1959.

Walter J. Lee
Attorney for Complainant

WALTER J. LEE
ATTORNEY-AT-LAW
VAN ANTWERP BLDG.
MOBILE, ALA.

Walter J. Lee
Notary Public,

FILED

NOV 6 1959

ALICE J. DUCK, Register