

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4787

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EVA HOFFMANN WILSON GANNON

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against-----

EVA HOFFMANN WILSON GANNON-----, Defendant-----

by ROBERT HAINES GANNON-----

-----, Plaintiff-----

Witness my hand this 9th day of December 1959

Alice J. Duck-----, Clerk

No. 4787 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

ROBERT HAINES GANNON
Plaintiffs

vs.

EVA HOFFMANN WILSON GANNON
Defendants

Summons and Complaint

Filed Dec. 9, 1929

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

BILL OF COMPLAINT

ROBERT HAINES GANNON,
Complainant

Vs.

EVE HOFFMAN WILSON GANNON,
Respondent

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

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT, SITTING IN EQUITY:

Now comes Robert Haines Gannon, the complainant in the above styled cause, and respectfully exhibits this his bill of complaint against Eve Hoffman Wilson Gannon, the respondent herein, and represents unto Your Honor as follows:

ONE

The complainant is a bona-fide resident citizen of the state of Alabama, and resides in Baldwin County, Alabama; and the complainant and the respondent, Eve Hoffman Wilson Gannon, are each over twenty-one(21)years of age. The respondent is a non-resident of Alabama, and her place of residence and post-office address is 2042 Grand Avenue, c/o Dr. Margot Hoffmann, Bronx 53, New York, New York.

TWO

The complainant is the lawful husband of the respondent, and was married to her in Basel, Switzerland, on or about August 20th, 1954; and thereafter the complainant and the respondent lived together as husband and wife in Switzerland and in Bronx, New York, New York, until in the month of October, 1956, when the respondent voluntarily abandoned the complainant's bed and board in Bronx, New York, New York, and continued said abandonment until in February, 1957, when the respondent returned to live with the complainant and a reconciliation was attempted, but three days thereafter, in February, 1957, respondent again voluntarily abandoned the complainant's bed and board in New York City, New York, and said abandonment has continued from the date it occurred for more than one(1)year next preceding the filing of the bill of complaint in this cause; and since said abandonment the complainant has become and is now a bona-fide resident citizen of the state of Alabama, with his residence in Baldwin County, Alabama.

THREE

One child was born of the marriage of the complainant and the respondent, in November of 1957, after the said separation of the parties hereto, said child being now two years of age and in the custody of the respondent in Bronx, New York, New York, at the respondent's aforesated address. The name of this child is Wendy Gannon, and she is being adequately cared for, and the complainant contributes reasonably toward her support.

PRAYER FOR PROCESS

WHEREFORE, THE PREMISES CONSIDERED, the complainant prays that the said Eve Hoffmann Wilson Gannon be made a party respondent to this bill of complaint by proper process of this Honorable Court, by publication, registered mail, or otherwise, and that she be required thereby to plead, answer, or demur to this bill of complaint within the time required by law and the rules and practices of this Honorable Court; otherwise that the allegation hereof shall be taken as confessed against her.

PRAYER FOR RELIEF

WHEREFORE, THE PREMISES FURTHER CONSIDERED, the complainant prays that upon a final hearing of this cause Your Honor will render a decree granting to the complainant an absolute divorce from his bonds of matrimony to the respondent, and the right to marry again, should he so desire. And the complainant prays for such other, further and different relief as in equity and good conscience he may be deemed to be entitled to receive.

K. E. Henderson

Solicitor for the Complainant

[Signature]

Solicitor for the Complainant

CECIL G. CHASON

ATTORNEY-AT-LAW
FOLEY, ALABAMA

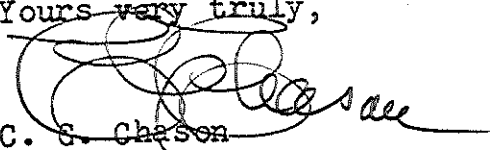
December 8, 1959

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint for Divorce
in the case of Gannon -vs- Gannon, the Respondent
being a non-resident. Service should be had by
Registered Mail.

Yours very truly,


C. G. Chason

CGC:fm

encls. as noted.

BILL OF COMPLAINT

ROBERT HAINES GANNON, Complainant)	IN THE CIRCUIT COURT OF
Vs.)	BALDWIN COUNTY, ALABAMA,
EVE HOFFMANN WILSON GANNON, Respondent)	IN EQUITY, NO. _____

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT, SITTING IN EQUITY:

Now comes Robert Haines Gannon, the complainant in the above styled cause, and respectfully exhibits this his bill of complaint against Eve Hoffmann Wilson Gannon, the respondent herein, and represents unto Your Honor as follows:

ONE

The complainant is a bona-fide resident citizen of the state of Alabama, and resides in Baldwin County, Alabama; and the complainant and the respondent, Eve Hoffmann Wilson Gannon, are each over twenty-one(21)years of age. The respondent is a non-resident of Alabama, and her place of residence and post-office address is 2042 Grand Avenue, c/o Dr. Margot Hoffmann, Bronx 53, New York, New York.

TWO

The complainant is the lawful husband of the respondent, and was married to her in Basel, Switzerland, on or about August 20th, 1954; and thereafter the complainant and the respondent lived together as husband and wife in Switzerland and in Bronx, New York, New York, until in the month of October, 1956, when the respondent voluntarily abandoned the complainant's bed and board in Bronx, New York, New York, and continued said abandonment until in February, 1957, when the respondent returned to live with the complainant and a reconciliation was attempted, but three days thereafter, in February, 1957, respondent again voluntarily abandoned the complainant's bed and board in New York City, New York, and said abandonment has continued from the date it occurred for more than one(1)year next preceding the filing of the bill of complaint in this cause; and since said abandonment the complainant has become and is now a bona-fide resident citizen of the state of Alabama, with his residence in Baldwin County, Alabama.

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One child was born of the marriage of the complainant and the respondent, in November of 1957, after the said separation of the parties hereto, said child being now two years of age and in the custody of the respondent in Bronx, New York, New York, at the respondent's aforestated address. The name of this child is Wendy Gannon, and she is being adequately cared for, and the complainant contributes reasonably toward her support.

PRAYER FOR PROCESS

WHEREFORE, THE PREMISES CONSIDERED, the complainant prays that the said Eve Hoffmann Wilson Gannon be made a party respondent to this bill of complaint by proper process of this Honorable Court, by publication, registered mail, or otherwise, and that she be required thereby to plead, answer, or demur to this bill of complaint within the time required by law and the rules and practices of this Honorable Court; otherwise that the allegation hereof shall be taken as confessed against her.

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FILED
DEC 9 1959
CLERK
REGISTER

K. E. Henderson
Solicitor for the Complainant *Mahilo*

[Signature]
Solicitor for the Complainant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 4787

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EVA HOFFMANN WILSON GANNON

-----, Defendant

by ROBERT HAINES GANNON

-----, Plaintiff

Witness my hand this 9th day of December 1959

Alice J. Duck, Clerk

RECORDED

No. 4787 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

ROBERT HAINES GANNON
Plaintiffs

vs.

EVA HOFFMANN WILSON GANNON
Defendants

Summons and Complaint

Filed Dec. 9, 1959

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

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_____, Sheriff

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this _____ 19____

by leaving a copy with

_____ Sheriff

_____ Deputy Sheriff