

4847

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

}

Circuit Court, Baldwin County

No. 4847

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DEAN KEITH

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

DEAN KEITH

, Defendant

by AUDREY KEY VOLKING, a minor by Alice Volking, as her next friend

, Plaintiff

Witness my hand this 10 day of February 1960

Alice J. Duck

, Clerk

No. 4847

Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

AUDREY KAY VOLKING, a minor by

Alice Volking, as her next friend
Plaintiffs

vs.

DEAN KEITH

Defendants

Summons and Complaint

Filed February 10, 1960

Alice J. Dunk 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

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

Your Complainant, Audrey Kay Volking, a minor, by Alice Volking, as her next friend, presents this Bill of Complaint against Dean Keith, and thereupon shows unto the Court and your Honor as follows:

1. Complainant, Audrey Kay Volking, is a minor fourteen years of age and brings this suit by Alice Volking, who is her mother, and next friend and both of whom are residents of Baldwin County, Alabama. The Respondent, Dean Keith, is over the age of twenty-one years and a resident of Baldwin County, Alabama.

2. That a marriage ceremony was performed between your Complainant and the said Respondent in Fairhope, Baldwin County, Alabama, on to-wit, August 21, 1959, under a marriage license issued by the Probate Court of Baldwin County, Alabama.

3. That your Complainant has learned since the said marriage ceremony that the Respondent was legally married at the time the said ceremony took place, having heretofore married Myrtle Taylor at Brewton, Alabama, on June 28, 1958, and that on August 21, 1959, the Respondent's wife was living and they were legally married on that said date, all of which was unknown to Complainant; that as soon as Complainant learned the true marital status of the Respondent she separated from the said Respondent and they have not lived together since as man and wife.

The premises considered, your Complainant makes the said Dean Keith a party respondent to this her Bill of Complaint and prays that service may be had upon him in the manner prescribed by law, and that he be required to plead, answer or demur to this Bill of Complaint within thirty days after such service, and that upon a hearing hereof your Complainant prays that this Honorable Court will enter a decree adjudging and declaring the said marriage ceremony between your Complainant and the said Respondent to be null and void, and that the marriage relation does not exist between

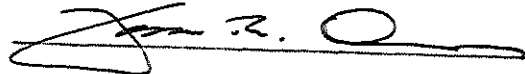
your Complainant and the said Respondent, Dean Keith, and that said marriage relation has never existed between your Complainant and the Respondent.

Your Complainant prays that she may have such other, further or different relief as in equity she may be entitled.

FILED

FEB 10 1960

ALICE J. DUCK, Register



Solicitor for Complainant.

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by AUDREY KEY VOLKING, a minor by Alice Volking, as her next friend
-----, Plaintiff.

Witness my hand this 10 day of February 1960.

Alice J. Duck-----, Clerk

Box 174 Daphne

No. 4847

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Baldwin County

CIRCUIT COURT

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Alice Volking, as her next friend
Plaintiffs

vs.

DEAN KEITH

Defendants

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Filed February 10, 1960

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

2-11 1960

Lawrence Wilkins, Sheriff
I have executed this summons

this _____ 19____
by leaving a copy with

Returned 15 Feb
Not found in my court / at _____ search no
quity.

Lawrence Wilkins, Sheriff
By Archie L. [Signature]
Deputy Sheriff

Sheriff

Deputy Sheriff