

4890

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons ELBERT A. ALLISON, TO appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by CAROLYN ALLISON, as Complainant and against ELBERT A. ALLISON, as Respondent.

WITNESS my hand this the 7 day of April, 1960.

Reisef. Luck
Register.

CAROLYN ALLISON	X	IN THE CIRCUIT COURT OF
COMPLAINANT	X	BALDWIN COUNTY, ALABAMA
VS	X	IN EQUITY.
ELBERT A. ALLISON	X	CASE NO. _____
RESPONDENT	X	

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

Your Complainant, Carolyn Allison, respectfully represents unto Your Honor and this Honorable Court as follows:

-1-

That your Complainant is over the age of 21 and a resident of Baldwin County, Alabama, and has been more than two years next preceding; The Respondent is over the age of 21 and is presently residing at 2212 N. Cooper St., Colorado Springs, Colorado, c/o N. L. Murphy.

-2-

That your Complainant and the Respondent married at Pascagoula, Mississippi, on July 20, 1955, and lived together as husband and wife until April 1, 1957.

-3-

That on April 1, 1957, while your Complainant and the Respondent were living together as husband and wife in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

-4-

There was born as fruits of this marriage between the Complainant and the Respondent two children, Kathy Allison, age 7, and Barbara Renia, age 3, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Elbert A. Allison, party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to the Complainant the care, custody and control of the said minor children, Kathy Allison, age 4, and Barbara Renia Allison, age 3; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

THOMPSON & WHITE

BY:


Solicitors for the Complainant.

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COURT HOUSE
ST. LOUIS, MO.

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BALDWIN COUNTY

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WITNESS my hand this the 7 day of April, 1960.

Alvin A. Welch
Register.

* * * * *

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COMPLAINANT	X	BALDWIN COUNTY, ALABAMA
VS	X	IN EQUITY.
ELBERT A. ALLISON	X	CASE NO. _____
RESPONDENT	X	

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THOMPSON & WHITE

BY: 
Solicitors for the Complainant.

RECORDED
4894

CAROLYN ALLISON

COMPLAINANT

VS

ELBERT A. ALLISON

RESPONDENT

* * * * *

BILL OF COMPLAINT

* * * * *

FILED

APR 21 1961

MADE A. DUCK, CLERK
REGISTRAR