

601

ALEX RAMSTEIN,
Complainant,

-vs-

ELSIE BECKETT RAMSTEIN.
Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE
BALDWIN COUNTY, ALABAMA.

TO THE HON. THE CIRCUIT COURT-EQUITY SIDE, STATE OF
ALABAMA, BALDWIN COUNTY AND THE HON. JOHN D. LEIGH,
JUDGE THEREOF, SITTING IN EQUITY:-

Comes your Complainant, Alex Ramstein and exhibits this
his Bill of Complaint for divorce against Elsie Beckett Ramstein
on the grounds of abandonment and shows unto your Honor and this
Court as follows:-

1. That both complainant and respondent are over the
age of twenty one years; that your complainant is a bona fide res-
ident of Baldwin County, Alabama, residing near Foley and has
been such resident for more than three years next immediately pre-
ceding the filing of this Bill of Complaint; that the address or
whereabouts of respondent is unknown to complainant and cannot
and could not be ascertained although he has made diligent inq-
uiries to that end; that when last heard from the respondent was
in St. Petersburg, Florida and complainant is informed and believes
and alleges upon such information and belief that respondent is
a non-resident of the State of Alabama.

2. That your complainant and the respondent were marr-
ied on heretofore to-wit: during the month of June, 1920 and liv-
ed together as man and wife for about eight months; that during
the middle of 1920 the respondent voluntarily deserted and aban-
doned your complainant without just cause or legal excuse; that
such abandonment took place in Baldwin County, Alabama more than
two years before the filing of this suit and has continued without
interruption.

PRAYER FOR PROCESS & RELIEF:

THE PREMISES CONSIDERED, the complainant prays that all
necessary orders and subpoenas be issued in this cause to make the
said Elsie Beckett Ramstein party defendant hereto; that upon a
final hearing hereof that it be decreed that the bonds of matri-
mony heretofore existing between the complainant and the respond-
ent be forever dissolved and that your complainant be again per-
mitted to contract the marriage relation should he so desire and,
as in duty bound he will ever pray, etc.

STONE & STONE,
Solicitors for Complainant.

FOOT NOTE:-

The respondent is required to answer each and every par-
agraph of the foregoing Bill of Complaint from 1 to 2 both inclu-
sive but answer under oath is hereby expressly waived.

STONE & STONE,
Solicitors for Complainant.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority, personally appeared Alex Ramstein, who is known to me and who, after being by me first duly and legally sworn, doth depose and say under oath, as follows:-

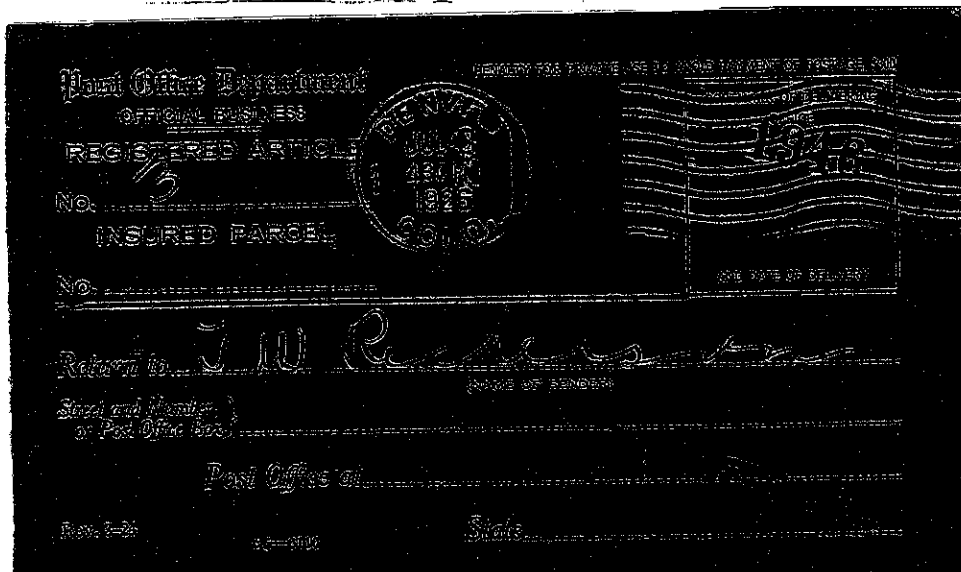
My name is Alex Ramstein; I am over the age of twenty one years and reside in Baldwin County, Alabama and have been a bona fide resident of Baldwin County, Alabama for more than three years next immediately preceding this date. I am the complainant in the cause now pending in the Circuit Court-Equity Side, Baldwin County, Alabama, wherein Elsie Beck ~~et~~ Ramstein is respondent; the said respondent is over the age of twenty-one years and her whereabouts and place of residence is unknown to me and cannot be ascertained after diligent inquiry to that end; when last heard of or from the said respondent was in St. Petersburg, Florida; that the said respondent is a non-resident of the State of Alabama and that service by publication is necessary to make her party defendant in said cause.

Alex Ramstein

Sworn to and subscribed before me, a Notary Public, is hereto affixed, this 2^d day of July, 1926.

Notary Public

Notary Public, Baldwin County, Alabama. (AFFIX SEAL)



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Filed July 2
 1924
 The Postmaster
 Registered