

2960

JAMES E. HUBER)
Complainant)
VS.)
VIVIAN W. HUBER)
Respondent)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

To the Honorable Hubert M. Hall, Judge of the Circuit Court of Baldwin County, Alabama, Sitting in Equity:

Your Complainant, James E. Huber, respectfully represents and shows unto your Honor:

1. That the Complainant is over the age of twenty-one years and is a resident of Theodore, Mobile County, Alabama and has been a bona-fide resident of the State of Alabama for more than two years next preceding the filing of this bill of complaint; that the respondent, Vivian W. Huber is over the age of eighteen years and is a resident of Loxley, Baldwin County, Alabama.

2. That the complainant and respondent were lawfully married on or about to-wit: March 15, 1952 at Pascagoula, Mississippi; and of this marriage there are no children.

3. Your complainant further avers and alleges that said respondent has been guilty of adultery with divers parties and persons.

The premises considered, your complainant makes the said Vivian W. Huber, a party respondent to this bill of complaint, and in order that the complainant may have the relief herein prayed for, May it please your Honor to cause the State's writ of subpoena to be issued, directed to the said Vivian W. Huber, commanding her to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from the said respondent, and that your Honor will grant such other, further or different relief as unto your Honor will seem just and proper.

Arthur C. Epperson
Solicitor for the complainant

Respondent's address:

Vivian W. Huber
% Raymond Partridge
Loxley, Alabama

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

JAMES E. HUBER
Complainant

VS.

VIVIAN W. HUBER
Respondent

BILL OF COMPLAINT

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALA.

The State of Alabama, BALDWIN County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon VIVIAN W. HUBBER

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State by

JAMES E. HUBBER

against VIVIAN W. HUBBER

Herein fail not. Due return make of this writ as the law directs.

Witness this 5th day of February, 1953

James E. Hubber, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

ORIGINAL

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The State of Alabama

BALDWIN

COUNTY.

IN CIRCUIT COURT, IN EQUITY

JAMES E. HUBBER

vs.

VIVIAN W. HUBBER

SUMMONS

Returned by the Sheriff and filed in office, this the ... day of ... 19...

Register.

Received in office, this the 5 day of

February, 1953

Taylor Wilkins, Sheriff.

I have executed the within by leaving a copy thereof with...

Vivian W Hubber

defendant named herein, on this the 7

day of Feb., 1953

Taylor Wilkins, Sheriff.

By W. F. Hall, Deputy.

Edleigh Steadman