

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA: IN EQUITY.

Comes AMELIA B. GRON, and by this her Bill of Complaint,  
presented against WILLIAM GRON, respectfully shows:

FIRST: That Complainant and Defendant are both over the  
age of twenty one years; that both have been for more than five  
years bona fide residents of Baldwin County, Alabama, but Defendant  
is now employed in the City of Detroit, Michigan.

SECOND: That Complainant and Defendant were married at  
Lisbon, Ohio, in the year 1932, but Defendant abandoned her in  
1940 when he went to Detroit and has lived there since that time,  
she continuing to reside in Baldwin County.

THIRD: That Complainant has lived separate and apart from  
the bed and board of Defendant for more than two years next prior  
to the filing of this bill without support from Defendant and has  
bona fide resided in the State during this period.

THE PREMISES CONSIDERED, Complainant prays that WILLIAM GRON  
be made party defendant to this cause, and by proper process re-  
quired to answer this Bill within the time prescribed by law.

Complainant further prays that upon the hearing of this cause  
a decree be rendered forever divorcing her from said WILLIAM GRON,  
granting her the right to marry again should she so desire and to  
have such other, further or different relief as to equity may seem  
meet.

*Elliott G. Rickaby*

Solicitor for Complainant.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

} No. \_\_\_\_\_

CIRCUIT COURT BALDWIN COUNTY

~~SPRING~~

TERM, 194 5

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon

WILLIAM GRON

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 \_\_\_\_\_

WILLIAM GRON

Defendant

by \_\_\_\_\_

AMELIA B. GRON

Plaintiff

Witness my hand this

22nd

day of

February

194 5



Clerk.

No. 1284

Page \_\_\_\_\_

**THE STATE OF ALABAMA**

BALDWIN COUNTY

**CIRCUIT COURT**

AMELIA B. GRON

Plaintiffs

vs.

WILLIAM GRON

Defendants

**SUMMONS AND COMPLAINT**

Filed February 22 1945

*[Handwritten Signature]*

Clerk

*Elliott G. Riches*  
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this 194

by leaving a copy with

Sheriff

Deputy Sheriff

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY  
No. \_\_\_\_\_  
SPRING TERM, 194 5

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon WILLIAM GRON

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 \_\_\_\_\_

WILLIAM GRON, Defendant

by \_\_\_\_\_

AMELIA B. GRON Plaintiff

Witness my hand this 22nd day of February 194 5

*R. H. Leach* Clerk.

**THE STATE OF ALABAMA**

BALDWIN COUNTY

**CIRCUIT COURT**

**AMELIA B. GRON**

Plaintiffs

vs.

**WILLIAM GRON**

Defendants

**SUMMONS AND COMPLAINT**

Filed February 22, 194 5

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

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Deputy Sheriff

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA: IN EQUITY.

Comes AMELIA B. GRON, and by this her Bill of Complaint,  
presented against WILLIAM GRON, respectfully shows:

FIRST: That Complainant and Defendant are both over the  
age of twenty one years; that both have been for more than five  
years bona fide residents of Baldwin County, Alabama, but Defendant  
is now employed in the City of Detroit, Michigan.

SECOND: That Complainant and Defendant were married at  
Lisbon, Ohio, in the year 1932, but Defendant abandoned her in  
1940 when he went to Detroit and has lived there since that time,  
she continuing to reside in Baldwin County.

THIRD: That Complainant has lived separate and apart from  
the bed and board of Defendant for more than two years next prior  
to the filing of this bill without support from Defendant and has  
bona fide resided in the State during this period.

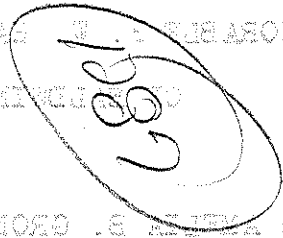
THE PREMISES CONSIDERED, Complainant prays that WILLIAM GRON  
be made party defendant to this cause, and by proper process re-  
quired to answer this Bill within the time prescribed by Law.

Complainant further prays that upon the hearing of this cause  
a decree be rendered forever divorcing her from said WILLIAM GRON,  
granting her the right to marry again should she so desire and to  
have such other, further or different relief as to equity may seem  
meet.

*Elliott B. Pinkley*  
Solicitor for Complainant.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT

IN EQUITY, ALABAMA, COUNTY OF BALDWIN



Comes now the Plaintiff, and by his undersigned

attorney, and the Defendant, respectively, and

shows that the Plaintiff and Defendant are both

age of twenty one years; that both have been for more than five

years bona fide residents of Baldwin County, Alabama, but Defendant

is now employed in the City of Detroit, Michigan.

SECOND: That Plaintiff and Defendant were married at

Cincinnati, Ohio, in the year 1933, but Defendant abandoned her in

1940 when he went to Detroit and has lived there since that time,

and continuing to reside in Baldwin County.

THIRD: That Plaintiff has lived separate and apart from

the Defendant for more than two years next prior

to the filing of this bill without support from Defendant and has

borne the expenses of this suit during this period.

THE PLAINTIFF CONSIDERS, and the Defendant admits, that WILLIAM GROW

is the party defendant to this cause, and by proper process re-

quired to answer this Bill within the time prescribed by law.

Plaintiff further prays that upon the hearing of this cause

a decree be rendered forever divorcing her from said WILLIAM GROW,

granting her the right to carry again as she deems and to

have such other, further or different relief as to equity may seem

just.

*[Handwritten signature]*

Attorney for Plaintiff