

1293

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETINGS:

WE COMMAND YOU, that you summon DENNIS MORRIS, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty days after the service of summons, and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by Marie Morris, by Minnie Owen, her mother and next friend, against the said Dennis Morris, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court, this the 5th day of March, 1945.

R. S. Duck
Register

MARIE MORRIS, by
MINNIE OWEN, her Mother
and next friend,
COMPLAINANT
VS.
DENNIS MORRIS
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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

Now comes your Complainant, Marie Morris, by Minnie Owen, her mother and next friend, and humbly complaining against the Respondent, Dennis Morris, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, sixteen years old, and brings this suit by Minnie Owen, her mother and next friend; that the Respondent is over twenty-one years of age, a bona fide resident of the State of Alabama, his present address being 354 State Street, Mobile, Alabama;

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on July 5, 1942, and lived together as husband and wife in Baldwin County, Alabama, until in November, 1942;

3.

That in November, 1942, and while the Complainant and the Respondent were living together as husband and wife, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time;

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said Dennis Morris party Respondent to this cause of action, 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.

Complainant further prays that upon a final hearing hereof, your Honor will enter an order and decree granting to the Complainant an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that your Honor will give and grant to her such other, further, different, or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

138

COMPLAINANT
MABLE MORRIS, PA MINNIE
per mother and
friend

RESPONDENT
DENNIS MORRIS

REESE & HILL

Solicitors for the Complainant

[Handwritten signatures and notes, including "Dennis Morris" and "Mable Morris"]

That in November 1918 and while the complainant and the Respondent were living together in the household and the Respondent was working and also in defendant's company, defendant and his Respondent voluntarily separated the bed and board of the complainant and was remained away voluntarily and continuously since that time;

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, give the said Dennis Morris her Respondent to this cause of action, retaining him to peace, answer, or come to the same within the time and under the penalties prescribed by law and the decree of your Honor's Court.

Complainant further prays that upon a final hearing heretofore, your Honor will enter an order and decree granting to the complainant an absolute decree of divorce, forever putting the bonds of matrimony existing between her and the Respondent, that your Honor will give and grant to her such relief, difference, or remedy as shall appear to be in equity and good conscience and in view of the evidence, and as she is entitled to receive, and as she is entitled to receive, and as she is entitled to receive.

1393
 229

MARIE MORRIS, by MINNIE OWEN, her mother and next friend,
 COMPLAINANT
 VS.
 DENNIS MORRIS
 RESPONDENT

married
husband

Sister says she does not know where he is would phone 254 State St.

SUMMONS AND COMPLAINT

Fee 3.00
 Paid 5.40

*Defendants' address
 254 State Street
 Mount Airie
 Ala*

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BALDWIN COUNTY

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Register

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and next friend,
COMPLAINANT
VS.
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RESPONDENT

IN THE CIRCUIT COURT OF
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Complainant further prays that upon a final hearing hereof, your Honor will enter an order and decree granting to the Complainant an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that your Honor will give and grant to her such other, further, different, or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

By: *S. Wallace*
Solicitors for the Complainant

Received
Returned
Delivered
BY
AND FACILITY

3/16/45
3/18/45

Marie Morris

W. H. HOLCOMBE, SHERRIFF
Marie Bennett

Marie Morris

622

1149
[Signature]

MARIE MORRIS, by MINNIE OWEN, her mother and next friend,

COMPLAINANT

VS.

M DENNIS MORRIS

RESPONDENT

SUMMONS AND COMPLAINT

Marie Morris 1945
Robert
Marie

3-6-45

RECORDED

293