

1351

STATE OF ALABAMA,  
BALDWIN COUNTY.

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

WE COMMAND YOU that you summon THEODORE JOHNSON, 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 Eula C. Johnson, against the said Theodore Johnson, 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 12 day of June, 1945.

R. S. Duck  
Register

EULA C. JOHNSON,	}	IN THE CIRCUIT COURT OF
COMPLAINANT,		BALDWIN COUNTY, ALABAMA,
VS.		IN EQUITY.
THEODORE JOHNSON,	}	
RESPONDENT,		

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

Now comes your Complainant, Eula C. Johnson, and humbly complaining against the Respondent, Theodore Johnson, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, and over twenty-one years of age;

2.

That your Complainant and the Respondent were married at Bay Minette, Alabama, in March, 1939, and lived together as husband and wife until in March, 1944;

3.

That in March, 1944, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process, make the said Theodore Johnson, 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 her 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: *[Signature]*  
Solicitors for the Complainant.

13/8/95

EULA G. JOHNSON,  
COMPLAINANT,

VS.

THEODORE JOHNSON,  
RESPONDENT.

SUMMONS AND COMPLAINT.

Received June 12, 1995  
District  
Register

Respondent at  
Owasso, Ok

*Handwritten signature:* Eula G. Johnson  
*Handwritten signature:* Theodore Johnson  
*Handwritten signature:* [unclear]



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WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process, make the said Theodore Johnson, 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 her 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: *[Signature]*  
Solicitors for the Complainant.

RESPONDENT AND COMPLAINANT

*[Handwritten signature]*  
15/1/44

RESPONDENT,  
THEODORE JOHNSON,

vs.

COMPLAINANT,  
EMILY C. JOHNSON,

1321

*[Handwritten mark]*

