

1362

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

WE COMMAND YOU, that you summon Lucy Mae Davis, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within thirty days after the service of the summons, and there to answer, plead, or demur without oath to a bill of complaint, lately exhibited by John Lee Davis, against the said Lucy Mae Davis, 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 thereof.

WITNESS, R. S. Duck, Register of said Court, this 10 day of July, 1945.

R. S. Duck

Register

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JOHN LEE DAVIS,
Complainant
vs.
LUCY MAE DAVIS,
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

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

Your Complainant, John Lee Davis, a resident citizen of Baldwin County, Alabama, over the age of twenty-one years, respectfully shows unto your Honor that on or about May 1, 1943, Complainant intermarried with said Lucy Mae Davis, at Brundidge, Alabama, and they lived together as man and wife until a year ago, most of the time residing in Pike County, Alabama, and Complainant has been a resident citizen of Alabama for one year next preceding the filing of this bill.

2. That Respondent, more than one year next preceding the filing of this bill of complaint, did voluntarily abandon the bed and board of complainant, and said abandonment has been voluntarily and continuous to the date hereof.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Lucy Mae Davis party Respondent to this cause of action, requiring her 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 grant unto him an absolute decree of divorce forever barring the bonds of matrimony existing between him and the Respondent; that your Honor will give and grant unto him such other, further, different or general relief as he may be entitled to receive, and as in duty bound he will ever pray.

John Lee Davis

John Lee Davis, Complainant

Forest A. Christian
Forest A. Christian, Foley, Alabama
Solicitor for Complainant

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA — GREETING:

WE COMMAND YOU, that you summon Lucy Mae Davis, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within thirty days after the service of the summons, and there to answer, plead, or demur without oath to a bill of complaint, lately exhibited by John Lee Davis, against the said Lucy Mae Davis, 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 thereof.

WITNESS, R. S. Duck, Register of said Court, this 10 day of July, 1945.

JOHN LEE DAVIS,
Complainant
vs.
LUCY MAE DAVIS,
Respondent

R. S. Duck
Register

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

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

Your Complainant, John Lee Davis, a resident citizen of Baldwin County, Alabama, over the age of twenty-one years, respectfully shows unto your Honor that on or about May 1, 1943, Complainant intermarried with said Lucy Mae Davis, at Brundidge, Alabama, and they lived together as man and wife until a year ago, most of the time residing in Pike County, Alabama, and Complainant has been a resident citizen of Alabama for one year next preceding the filing of this bill.

2. That Respondent, more than one year next preceding the filing of this bill of complaint, did voluntarily abandon the bed and board of complainant, and said abandonment has been voluntarily and continuous to the date hereof.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Lucy Mae Davis party Respondent to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Courts;

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

John Lee Davis

John Lee Davis, Complainant

Forest A. Christian
Forest A. Christian, Foley, Alabama
Solicitor for Complainant

FILED TO JUNE

1892

THE STATE OF ALABAMA
SALVAGE COUNTY

TO ALL WHOM THESE PRESENTS SHALL COME, I, THE CLERK OF THE COURT, DO hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files of the Court.

THE COURT OF THE COUNTY OF SALVAGE, ALABAMA, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files of the Court.

WITNESSETH, I, the Clerk of the Court, this 10th day of July, 1945.

[Handwritten signature]
Clerk of the Court

BILL OF COMPLAINT

1862

JOHN LEE DAVIS, Complainant

vs.

JUDY HAE DAVIS, Respondent

IN THE CIRCUIT COURT OF THE COUNTY OF SALVAGE, ALABAMA
IN REPLY

ALABAMA, IN REPLY

That complainant, John Lee Davis, a resident of the County of Baldwin, Alabama, over the age of twenty-one years, respectfully shows unto your Honor that on or about May 1, 1945, Complainant, John Lee Davis, and Respondent, Judy Hae Davis, were living together as man and wife until a year ago, most of the time residing in Baldwin County, Alabama, and Complainant has been a resident citizen of Alabama for one year next preceding the filing of this Bill.

That Respondent, Judy Hae Davis, more than one year next preceding the filing of this Bill of Complaint, did voluntarily abandon the bed and board of Complainant, and said abandonment has been voluntarily and continuously to the date heretofore.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Judy Hae Davis party Respondent to this cause of action, requiring her 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 your Honor will grant him an absolute divorce from and against Respondent, and the Respondent, and that your Honor will give and grant unto your Honor, as in and to the Bill of Complaint, and as in duty bound he will ever pray.

[Handwritten signature]
John Lee Davis, Complainant
[Handwritten signature]
Robert A. Christian, Esq., Attorney for Complainant

LAW OFFICE OF
FOREST A. CHRISTIAN
FOLEY, ALABAMA

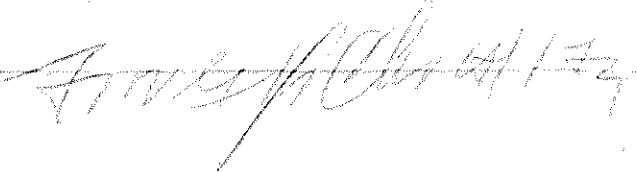
August 20, 1947

Mrs. Alice J. Duck
Clerk of the Court
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed is the Bill of Complaint in the Davis vs. Davis case. My file in this case which is over two years old, does not show that I collected any money on this case although I went out to see the Respondent in order to get her to sign an answering waiver. Accordingly, it appears that I have not received any money or Court costs in this case which I regret. Accordingly, it appears that it will be necessary to issue an execution in this case.

Yours very truly,

A handwritten signature in cursive script, appearing to read "Forest A. Christian", is written over a horizontal line. The signature is written in dark ink and is somewhat slanted to the right.