

366

Jesse J. Habush
Attorney at Law
Suite 423 Caswell Block
Milwaukee

July 26, 1945.

Beebe & Hall
Attorneys at Law
Bay Minette, Alabama

Gentlemen:

Re: Richard Myers vs. Elinore Myers

Our client, Mrs. Elinore Myers, advises us that she is in receipt of a complaint in a action for divorce commenced by her husband, Richard, in the Circuit Court of Bladwin County, Alabama.

This is to advise you that the Circuit Court of Milwaukee County on the 1st day of November, 1944, granted a judgment of divorce to Mrs. Myers, as well as the custody of the minor children of the parties. This divorce was obtained by publication under our statutes and a copy of the summons and complaint was mailed to Mr. Myers, and I am definitely certain that he received them.

I would also like to call your attention to the fact that Mr. Myers was and is not a resident of the State of Alabama for a three year period, having resided there since July, 1943, and therefore I doubt whether the Circuit Court of Alabama would take jurisdiction in the matter.

You might also advise Mr. Myers that Mrs. Myers is seeking an abandonment warrant (criminal) for failure to support or contribute to the support of the minor children of the parties and will seek to have him brought back to this state.

Yours very truly,


JESSE J. HABUSH

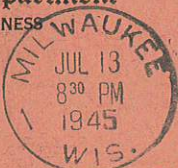
JJH:mme

cc: Clerk of the Circuit Court
of Baldwin County
Bay Minette, Alabama

Post Office Department

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300



POSTMARK OF DELIVERING OFFICE

Return to

R S Duck
(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE

No.

38

Post Office

Bay Minette, Ala.

INSURED PARCEL

No.

16-12421

State

Bay Minette, Ala.
July 13 1945

RETURN RECEIPT

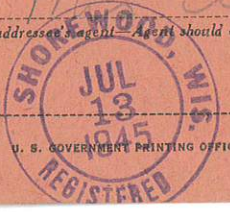
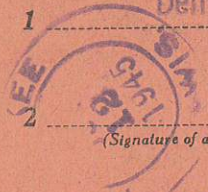
Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1 **Deliver to Addressee Only**

(Signature or name of addressee)

(Signature of addressee's agent - Agent should enter addressee's name on line ONE above)

Date of delivery _____, 194



RECEIPT FOR REGISTERED ARTICLE No. 38

no fee paid. class postage paid. 7-11, 19 45 (Date)

Declared value, \$ none Surcharge paid, \$ _____

From R S Smith (Sender)

Addressed to Eleanor Meyer (Post office and State)

4637 N Bartlett St (Address) Milwaukee, Wis (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee ✓ in person or order Special delivery fee _____

Delivery restricted to addressee Fee paid no Postmaster, per WAS

gpo 16-12666



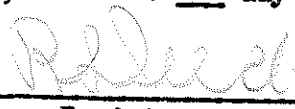
Deliver to Addressee

STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU that you summon ELINOR MYERS, 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 RICHARD MYERS, against the said ELINOR MYERS, 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 11 day of July, 1945.


Register

RICHARD MYERS,

COMPLAINANT,

VS.

ELINOR MYERS,

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, RICHARD MYERS, and humbly complaining against the Respondent, ELINOR MYERS, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age, a bona fide resident of Baldwin County, Alabama, and has been for more than 3 years next preceding the filing of this bill of complaint; that the Respondent is over twenty-one years of age, a non resident of the State of Alabama, her address being 4632 N. Bartlett Street, Milwaukee, Wisconsin;

2.

That your Complainant and the Respondent married at Waukegan, Ill., on December 19, 1932, and lived together as husband and wife until March 29, 1944;

3.

That on March 29, 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 Elinor Myers, 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 of this Honorable Court.

Complainant further prays that upon a final hearing hereof, your Honor will enter an order and decree, granting to 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 to him such other, further, different, or general relief as he may in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

By: *J. L. Beebe*
Solicitors for the Complainant

1364

RICHARD MYERS,
COMPLAINANT,
VS.
ELINOR MYERS,
RESPONDENT.

SUMMONS AND COMPLAINT

7-11-43
[Handwritten signature]

TO THE COURT OF THE COUNTY OF ...
I, the undersigned, 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 of the County of ...
Witness my hand and seal of office at the City of ... this ... day of ... 1943.

Very truly yours,
[Signature]