

1409

STATE OF ALABAMA,  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU that you summon RUBY BETTIS 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 CHARLIE J. BETTIS, against the said RUBY BETTIS, 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 24 day of September, 1945.

  
Register

CHARLIE J. BETTIS,  
COMPLAINANT,  
VS.  
RUBY BETTIS,  
RESPONDENT.

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

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

Your Complainant, CHARLIE J. BETTIS, 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 5 years next preceding the filing of this bill of Complaint; that the Respondent is over twenty-one years of age, a resident of Baldwin County, Alabama, but presently residing at 150 Wilson Avenue, Prichard, Alabama;

2.

That the Complainant and the Respondent are husband and wife, having married at Foley, in Baldwin County, Alabama, on April 5, 1941; that they lived together as husband and wife, in Baldwin County, Alabama, until June 1, 1941;

That on June 1, 1941, and while they 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 Ruby Bettis, 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, upon the hearing hereof, 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; Complainant prays for such other, further, different, or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

CIVILITE 1. BETTIS

COMPLAINANT

AS

RUBY BETTIS

RESPONDENT

*Handwritten notes:*  
Ruby Bettis  
Respondent  
Complainant  
Baldwin County  
Alabama

BEEBE & HALL

By:

*Handwritten signature*

Solicitors for the Complainant.

21 FROM AND COMPLAINANT

16

CHARLIE J. BETTIS,  
COMPLAINANT,

VS.

RUBY BETTIS,  
RESPONDENT.

*150 W. Main St.  
Richard*

*No address like this*

SUMMONS AND COMPLAINT.

Solicitor for the Complainant.  
*[Signature]*

DEBBE & HAY

in duty bound he will ever pray.

refer as he may be in duty and God conscience obliged to receive, and as  
Respondent's Complainant begs for such other, further, difference or remedy  
granted, forever leaving the party of matrimony existing between him and the  
party, under an order and decree, according to him in accordance with the  
decree.

Complainant further begs that Honor Mr. J. upon the hearing  
of this Honorable Court.

within the time and under the penalties prescribed by law and the practice  
to this cause of action, requiring her to plead answer or demurrer to the same  
Honor will by proper process, make the said Ruby Bettis' party Respondent  
WHEREFORE, the premises considered, Complainant begs that your  
admirably and commendably since that time.

expended the part and part of the Complainant, and has remaining such  
pursuing and wife, in Belknap County, Virginia, the Respondent admirably  
that on June 1, 1901, and wife that were living together as

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BEEBE & HALL

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

Accepted Sept. 29, 1945  
Returned Oct. 5, 1945  
Not tested in NY County after diligent search  
and inquiry.  
W. H. HOLCOMBE, Sheriff  
H. C. Sandus

1223

1223

CHARLIE J. BETTIS,  
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VS.  
RUBY BETTIS,  
RESPONDENT.

SUMMONS AND COMPLAINT.

Filed Sept 24 1945  
Proctor  
Richter