

1743

STATE OF ALABAMA )  
COUNTY OF BALDWIN)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons ESTELLE BROOKS, 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 OSCAR BROOKS, against the said ESTELLE BROOKS, 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 14 day of October, 1946.

R. S. Duck  
Register

OSCAR BROOKS

COMPLAINANT

VS

ESTELLE BROOKS

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:

Your Complainant, Oscar Brooks, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That both your Complainant and the Respondent are bona fide resident of the State of Alabama, and over 21 years of age.

m 2.

That your Complainant and the Respondent are husband and wife; that they married at Evergreen, Alabama, in 1934, and lived together as husband and wife in the State of Alabama until 1942.

3.

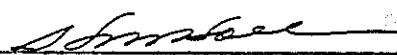
That in 1942, more than four years ago the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, Complainant prays that your Honor will by proper process, make the said Estelle Brooks party Respondent to this

ORDERED, signed this 11th day of March, 1934, at the City of  
Mobile, Alabama, that the Respondent do answer the Complaint within  
thirty days, and that she do appear at the trial of the same.

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.

The Complainant prays that your Honor will, upon a 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.

  
Solicitor for the Complainant

The Respondent Address is Estell Brooks, Route 1, Box 107 A, Owassa,  
Alabama.

1743

STATE OF ALABAMA,  
CONECUH COUNTY.

I, W. A. Moore, Sheriff of said County in said State, hereby  
certify I have served a copy of the within conveyance on Estell  
Brooks, Defendant, on this the 17th, day of October, 1946.

W A Moore  
Sheriff, Conecuh County, Alabama.

1743

~~W. A. MOORE~~  
Oscar Brooks

COMPLAINANT

VS

~~D. C. BOND~~  
Estelle Brooks

RESPONDENT

BILL OF COMPLAINT

Filed

10-14-46

R. S. Murchey  
A. J. D.

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.

Solicitor for the Complainant

The Respondent Address is Estell Brooks, Route 1, Box 107 A, Owassa, Alabama.

1743

STATE OF ALABAMA,  
CONECUH COUNTY.

I, W. A. Moore, Sheriff of said County in said State, hereby  
certify I have served a copy of the within conveyance on Estell  
Brooks, Defendant, on this the 17th, day of October, 1946.

W. A. Moore  
Sheriff, Conecuh County, Alabama.

1743

~~W. A. Moore~~  
Oscar Brooks

COMPLAINANT

VS

~~W. A. Moore~~  
Estelle Brooks

RESPONDENT

BILL OF COMPLAINT

Filed

10-14-46

G.S. Murch  
C.J.D.