

1758

STATE OF ALABAMA)
COUNTY OF BALDWIN)

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons NORMAN FLOWERS, 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 VONCILLE SIMS, against the said Norman Flowers, 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 7th day of October, 1946.

R. S. Duck
Register

VONCILLE SIMS

COMPLAINANT

VS

NORMAN FLOWERS

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 humbly complaining against the Respondent, Norman Flowers respectfully represent and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent wen through a marriage ceremony at Bay Minette, Alabama, on October 6, 1946.

3.

That said attempted marriage was wholly void in that the Respondent at that time did not have the legal right to contract marriage; that he had secured a divorce from his former wife and the decree expressly stated that he was not

to contract another marriage until after the expiration of sixty days from the date thereof; that sixty days had not expired from the time he secured his decree of divorce.

4.

That your Complainant immediately upon learning that he did not have the right to contract marriage refused to, and ceased living with the Respondent.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Norman Flowers party Respondent hereto and by proper process require 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 by proper decree annul and hold naught the attempted marriage between your Complainant and the Respondent.

Voncille Sims
Complainant

John S. Lee
Solicitor for the Complainant

STATE OF ALABAMA)
COUNTY OF BALDWIN)

Before me H. M. Hall, a Notary Public, in and for said County, in said State, personally appeared Voncille Sims, who is known to me, and who having been by me first duly sworn, deposes and says; that the facts contained in the foregoing bill of complaint are true.

Voncille Sims

Sworn to and subscribed before me on this the 21 day of October, 1946.

John S. Lee
Notary Public, Baldwin County, Alabama

VONCILE SIMS

COMPLAINANT

VS

NORMAN FLOWERS

RESPONDENT

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

Now comes the Respondent, Norman Flowers, and for answer to the complainant's Bill of complaint.

He denies all the allegations contained in the Complainant's bill of complaint and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses and agrees that this cause be submitted forthwith for final decree without further notice.

Norman Flowers

STATE OF ALABAMA)
COUNTY OF BALDWIN,

I, Stambaugh, a Notary Public, in and for said County, in said State, hereby certify that Norman Flowers, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 71 day of October, 1946.

Stambaugh
Notary Public, Baldwin County, Alabama

VONCILLE SIMS
COMPLAINANT
VS
NORMAN FLOWERS
RESPONDENTS

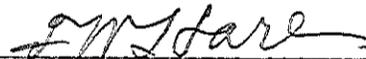
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY

This cause coming on to be heard was submitted for final decree upon the verified complaint of the Complainant, the answer and waiver of the Respondent, and certified copy of decree of divorce in the matter of Norman Flowers vs Pauline Flowers and upon consideration thereof, the court is of the opinion that the attempted marriage between the Complainant and the Respondent was illegal and void, and that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, by the court, that the marriage between the Complainant and the Respondent by and it is hereby annulled, and that the Complainant is forever released and discharged from any and all obligations and duties arising from said marriage.

IT IS FURTHER ORDERED that the Complainant pay the cost hereof and which execution may issue.

Done this the 11th day of November, 1946.



Judge

State of Alabama
Baldwin County

I, R. S. Duck, Register of the Circuit Court of Baldwin County, hereby certify that the foregoing is a full, true, correct and complete copy of the decree of the court in the cause of Voncille Sims vs Norman Flowers, as it appears on file and of record in my office.

IN WITNESS WHEREOF I have hereunto set my hand and seal of office on this the ___ day of November, 1946.

Register.