

379

The State of Alabama, }  
Baldwin County. } Circuit Court of Baldwin County, In Equity.

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon \_\_\_\_\_

ROBERT VALRIE,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

SUSIE VALRIE,

against said ROBERT VALRIE,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, M. A. Stone, Register of said Circuit Court, this 10th day of November 1937

*M. A. Stone*

Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Susie Valree, Complainant.

vs.

In Circuit Court of Baldwin County, Alabama.

Robert Valree. Defendant.

In Equity.

To the Hon. F. W. Here, Judge of the 21st. Judicial Circuit:

Your complainant, Susie Valree, humbly complain~~ing~~ing, alleges and complains that She and the defendant, Robert Valree were married in Bay Minette, Alabama on- to-wit:- March 5, 1927, and that both are over the age of 21 years, and that your complainant has been a bona fide resident of Baldwin County, Alabama for more than four years next preceding the filing of the complaint in this cause, and that the said Robert Valree is a bona fide resident of Bay Minette, Alabama.

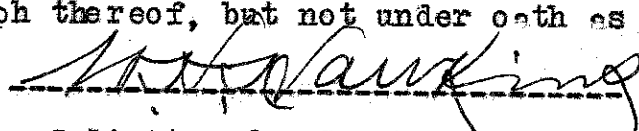
That the defendant, Robert Valree, voluntarily abandoned your complainant on to-wit:- February 18, 1930, and that said voluntary abandonment was without any fault on the part of your complainant and that since said above date, complainant has not lived with defendant as his wife, but separate and apart from him since February 18, 1930.

Complainant, Susie Valree, requests that the said Robert Valree, be made a party defendant to this cause, and that he be served with notice of this proceedings, and all necessary proceedings be had to perfect service on him, and that on the hearing thereof, your Hon<sup>OR</sup> Will take jurisdiction of this cause and grant to your complainant a decree dissolving the bonds of matrimony existing between complainant and defendant, and for such other and further relief as in equity may seem proper, for which your complainant will ever pray etc.

  
Solicitor for Complainant.

Foot Note.

Defendant, Robert Valree is required to answer the averments of this complaint and each paragraph thereof, but not under oath as oath is hereby waived.

  
Solicitor for Complainant.

ORIGINAL:

SERVE ON \_\_\_\_\_

Circuit Court of Baldwin County  
IN EQUITY

No. 379

SUMMONS

SUSTIE VALRTE,

Complainant,

vs.

ROBERT VALRTE,

Respondent,

W. H. HAWKINS,

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

*Beck*  
RECORDED 4-338-

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this \_\_\_\_\_

day of \_\_\_\_\_ 193\_\_

SHERIFF

Executed this \_\_\_\_\_ day of \_\_\_\_\_

193\_\_

by leaving a copy of the within Summons with \_\_\_\_\_

Defendant

Sheriff

By \_\_\_\_\_ Deputy Sheriff