

200

-----X  
 EDNA HOGAN CLARY,  
 COMPLAINANT. )  
 -VS- )  
 JOHN CLARY, alias )  
 JOHN ZACHARACKAS, )  
 Defendant. )  
 -----X

IN THE CIRCUIT COURT-EQUITY SIDE  
 STATE OF ALABAMA.  
 BALDWIN COUNTY

No. \_\_\_\_\_

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,  
 EQUITY SIDE, AND THE HON. A. E. GAMBLE, JUDGE THEREOF, SITTING IN EQUITY:

Your Complainant, Edna Hogan Clary brings this her original bill  
 of complaint for divorce against the defendant, John Clary, alias John  
 Zacharackas, and respectfully shows and represents unto this honorable  
 court and unto your honor;.

FIRST.

That both the complainant and the defendant are over the age of  
 twenty-one years (21); that complainant is a "bona fide" resident of  
 Baldwin County, State of Alabama; that John Clary is a non-resident of  
 the State of Alabama, and when last heard from resided in Pensacola,  
 Florida but his more particular address is unknown and cannot be ascer-  
 tained by complainant after diligent inquiry on her part.

SECOND.

That complainant and defendant were married in Nashville, Tenn.,  
 on to-wit; April 3rd, 1919, she leaving her home in Baldwin County for  
 that purpose; that said John Clary's real name was John Zacharackas and  
 not John Clary, and that said defendant married complainant under this  
 assumed name.

THIRD.

That shortly after complainant and the defendant were married  
 the said defendant attempted to get from complainant all the money that  
 she had saved, and, failing to do so, abused and threatened <sup>Complainant</sup> ~~Gratrix~~ and  
 became violent toward her in his threats and threatened <sup>Complainant</sup> ~~Gratrix~~ that  
 he would cut the throat of complainant with a razor. That defendant  
 forbid complainant from leaving the house and virtually made a prisi-  
 ner of her. That from his conduct toward complainant ~~she had~~ had and



still has reasonable apprehension of violence on her attended with danger to life or health.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, Oratrix prays that a subpoena be issued to the defendant, requiring him to appear and plead, answer or demur, to this bill of complaint, within the time required by law, under the pains and penalties of this court, or for any other necessary orders to make the said defendant a party respondent to this bill of complaint.

PRAYER FOR RELIEF.

THAT UPON A FINAL HEARING OF THIS BILL, complainant prays that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between the complaint, Edna Hogan Clary and the defendant John Clary, alias John Zacharackas, be forever dissolved; that your complainant be again permitted to contract the marriage relation, and for such other relief as she may be entitled to in equity and good conscience and such that to your honor will seem meet and proper, And, as in duty bound, she will ever pray, etc., etc.,

*Steuers Steuere*

SOLICITORS FOR COMPLAINANT.

FOOT NOTE:- The defendant, John Clary, alias John Zacharackas, is required to answer each and every paragraph of the foregoing bill of complaint, but not under oath, answer under oath being hereby expressly waived.

*Steuers Steuere*

SOLICITORS FOR COMPLAINANT.



EDNA HOGAN CLARY  
Compet  
VS

In the Circuit Court of Baldwin County. Ala.  
Equity Side.

JOHN CLARY. *alias*

*John Zacharopoulos.*

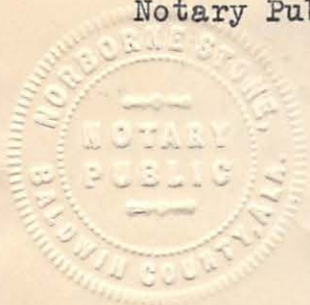
Before me Norborne Stone, a Notary Public in and for said State and County personally appeared Edna Hogan Clary, who is known to me and who after being by me duly sworn doth depose and say under oath that she is the complainant in above entitled cause against John Clary, *alias John Zacharopoulos* that she is over the age of 21 years, and is a resident of Baldwin County State of Alabama, that John Clary *alias John Zacharopoulos* is over the age of 21 years and is a non resident of the State of ~~Florida~~ *Alabama*, and when last heard from resided in Pensacola, but at what street address affiant does not know, *and cannot ascertain after diligent* and that service by publication is necessary in order to make said John Clary, *alias John Zacharopoulos* respondent to her bill of complaint.

*Edna Hogan Clary.*

Sworn to and subscribed before me  
this Oct. 15th. 1919.

*Norborne Stone*

Notary Public Baldwin County. Ala.



BOWEN  
WELLS

*read my copy to this part*



Affidavit of non-  
residence.

Edna Hogan Cary  
Complainant

vs  
John Cary, alias John  
Zucharackas  
Defendant

Divorce proceedings

Circuit Court - Equity Sec.  
State of Alabama  
Baldwin County

Filed in this office  
this Oct. 16-1919

Register

Stave & Stave  
Atty. for Compt



Filed 10/16/1919.  
P. W. Stevenson  
Register.



Notice to Non resident.

Elna Hogan Clary,

No. 200. vs Complainant.

John Clary alias

John zacharackas

Defendant

In the Circuit Court, Equity Side.

State of Alabama, Baldwin County.

*Appears to*

In this cause it being made to the Register of this court by the affidavit of Elna Hogan Clary, that the defendant John Clary alias John zacharackas, is a non resident of the State of Alabama, and is over the age of 21 years .

It is therefore ordered that publication be made in the Baldwin Times a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said defendant to answer or demur to the Bill of Complaint in this cause, by the 15th, of November, 1919 or after 30 days therefrom a decree proconfesso may be taken against him.

Done and order at Bay Minette, Alabama, this the 16th, day of October, 1919.

*[Signature]*  
-----Register.

Stone and Stone, atty's  
for Complainant.

# 48  
9/13/19



# 200 Copy

Notice of Publication

Notice to the Editor

Dear Sir,  
I have the honor to acknowledge the receipt of your letter of the 10th inst. in relation to the publication of the above mentioned article in the 10th issue of the 1887 volume of the Journal of the American Medical Association.

The article will appear in the 10th issue of the 1887 volume of the Journal of the American Medical Association.

Yours truly,  
J. M. [Signature]

In witness whereof I have hereunto set my hand and the seal of the Association at Chicago, Illinois, this 15th day of August, 1887.

Very respectfully,  
J. M. [Signature]

It is respectfully requested that you will be good enough to send me a copy of the article as soon as it is published, so that I may be able to refer to it in my report to the Association.

Very truly yours,  
J. M. [Signature]

J. M. [Signature]

Very truly yours,  
J. M. [Signature]



-----X  
EDNA HOGAN CLARY, )  
                  COMPLAINANT. )  
                  - vs - )  
JOHN CLARY, alias )  
JOHN ZACHARACKAS, )  
                  Defendant. )  
-----X

IN THE CIRCUIT COURT-EQUITY SIDE  
STATE OF ALABAMA.  
BALDWIN COUNTY

No. \_\_\_\_\_

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Your Complainant, Edna Hogan Clar, brings this her original bill  
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FIRST.

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Florida but his more particular address is unknown and cannot be ascer-  
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SECOND.

That complainant and defendant were married in Nashville, Tenn.,  
on to-wit; April 3rd, 1919, she leaving her home in Baldwin County for  
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THIRD.

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the said defendant attempted to get from complainant all the money that  
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became violent toward her in his threats and threatened <sup>Complainant</sup> Oratrix that  
he would cut the throat of complainant with a razor. That defendant  
forbid complainant from leaving the house and virtually made a prisi-  
ner of her. That from his conduct toward complainant she had had and



still has reasonable apprehension of violence & her attended with danger to life or health.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, Oratrix prays that a subpoena be issued to the defendant, requiring him to appear and plead, answer or demur, to this bill of complaint, within the time required by law, under the pains and penalties of this court, or for any other necessary orders to make the said defendant a party respondent to this bill of complaint.

PRAYER FOR RELIEF.

THAT UPON A FINAL HEARING OF THIS BILL, complainant prays that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between the complaint, Edna Hogan Clary and the defendant John Clary, alias John Zacharackas, be forever dissolved; that your complainant be again permitted to contract the marriage relation, and for such other relief as she may be entitled to in equity and good conscience and such that to your honor will seem meet and proper, And, as in duty bound, she will ever pray, etc., etc.,

*Stam & Stone*

SOLICITORS FOR COMPLAINANT.

FOOT NOTE:- The defendant, John Clary, alias John Zacharackas, is required to answer each and every paragraph of the foregoing bill of complaint, but not under oath, answer under oath being hereby expressly waived.

*Stam & Stone*

SOLICITORS FOR COMPLAINANT.



Largest Weekly Circulation in South Alabama

*Bay Minette, Ala.,*

November 12th, 1919

*M*

Edna Hogan Clary, Complainant

VS

John Clary, alias John Zacharackas, Defendant

# THE BALDWIN TIMES

ABNER J. SMITH, PROPR.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

All Bills Must Be Paid Within 30 Days

To publishing above Non-Resident Notice in The Baldwin Times in issues of October 16th and 23rd, 1919:

158 words @  $2\frac{1}{2}$  ¢ per word.....

\$3.95



# THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,  
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

NON-RESIDENT NOTICE

Edna Hogan Clary, Complainant

vs

John Clary, alis John Zacharackas, Deft

Was published in said Newspaper for 2 consecutive weeks

in the following issues:

Date of first publication October 16th, 1919 Vol. 30 No. 35

“ “ second “ October 23rd, 1919 Vol. 30 No. 36

“ Withdrawn after 2nd publication by order of Complainants, attys,  
“ third Stone & Stone. Vol. No.

“ “ fourth “ Vol. No.

Subscribed and sworn to before the undersigned

this 12th day of Nov 1919.

T. W. Richerson  
Clerk Circuit Court.

Abner J. Smith  
Publisher.

### Notice to Non Resident.

Edna Hogan Clary, Complainant, vs. John Clary alias John Zacharackas, Defendant. No. 200.

In the Circuit Court, Equity Side, State of Alabama, Baldwin County.

In this cause it being made to appear to the Register of this Court by the affidavit of Edna Hogan Clary, that the Defendant, John Clary alias John Zacharackas, is a non resident of the State of Alabama, and is over the age of 21 years.

It is therefore ordered that publication be made in the Baldwin Times a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said defendant to answer or demur to the Bill of Complaint in this cause, by the 15th of November, 1919, or after 30 days herefrom a decree pro confesso may be taken against him.

Done and order at Bay Minette, Alabama, this the 16th day of October, 1919.

T. W. Richerson,  
Register.

Stone and Stone, Attys.  
for Complainant. 35-4t