

DOCKET NO. 173

NUMBER TERM YEAR

101 February 1961

Emily M. Parry

VERSUS

Forrest F. Parry

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

EMILY M. PARRY, :
Plaintiff :
-vs- : No. 101 FEBRUARY TERM, 1961
FORREST F. PARRY, : IN DIVORCE
Defendant. :
:

CONSTABLE'S RETURN

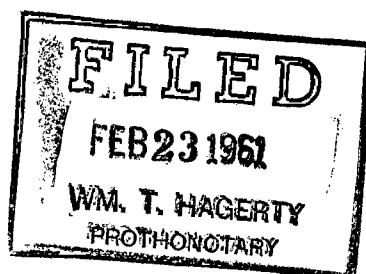
Now, February 22nd, 1961, at 11:15 A.M., E.S.T., served FORREST F. PARRY, at his place of employment, Johnson's Body Shop, DuBois, Pennsylvania, with a true and attested copy of the within Complaint in Divorce No. 101 February Term, 1961 by handing the same to and leaving with him, personally, and making known to him the contents thereof.

So answers,

James Thompson
Constable

Sworn to and subscribed before me this 22nd day of February, 1961.

Josephine M. Cherry
JOSEPHINE M. CHERRY
Notary Public, My Com-
mission expires Jan. 7, 1963



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

EMILY M. PARRY, Plaintiff, :
-vs- : No. 101 FEBRUARY TERM, 1961.
FORREST F. PARRY, Defendant. : IN DIVORCE

COMPLAINT

Now comes, EMILY M. PARRY, Plaintiff and brings this Complaint in Divorce against her husband, FORREST F. PARRY, on a cause of action whereof the following is a statement:

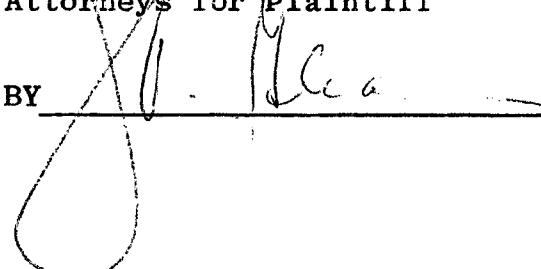
1. That the name of the Plaintiff is EMILY M. PARRY and the name of the Defendant is FORREST F. PARRY.
2. That neither the said Plaintiff nor the Defendant are minors or incompetent.
3. That the said Plaintiff and Defendant were married in Bellowfalls, Vermont, on March 1, 1949.
4. That at the time of the said marriage, the Plaintiff and Defendant were both natural born citizens of the United States, and that both the Plaintiff and Defendant have resided continuously for the past eight years in Pennsylvania prior to the filing of this Complaint. The present residence of the Plaintiff being 15 Hubert Street, DuBois, Pennsylvania, and the present residence of the Defendant is c/o Mrs. Elda Parry, 479 West DuBois Avenue, DuBois, Pennsylvania.
5. That there were three children born to this marriage, namely, Roy Douglas, age 13; Shirley, age 11; and Marsha, age 9; all of whom reside with said Plaintiff, at 15 Hubert Street, DuBois, Pennsylvania.
6. That neither the Plaintiff nor the Defendant have instituted any prior action for divorce.

7. That in violation of his marriage vows and the laws of this Commonwealth, the said Defendant has been guilty of such indignities to the person of the Plaintiff, the injured and innocent spouse, as to render her condition intolerable and life burdensome.

WHEREFORE, the Plaintiff prays that she be freed and separated from the bonds of matrimony heretofore contracted between herself and the said Defendant and be granted a decree in divorce a vinculo matrimonii dissolving the bonds of the said marriage.

GLEASON, CHERRY & CHERRY
Attorneys for Plaintiff

BY

A handwritten signature consisting of a stylized 'X' and a cursive name, likely belonging to one of the attorneys mentioned in the text above.

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF CLEARFIELD : SS.

Personally appeared before me, a Notary Public, in
and for the County and State aforesaid, EMILY M. PARRY, who,
being duly sworn according to law, deposes and says that the facts
set forth in the foregoing Complaint are true and correct and
that the same is not made out of levity or by collusion between
herself and the said Defendant for the mere purpose of being
freed and separated from each other, but in sincerity and truth
for the causes mentioned in the Complaint.

Emily M. Parry.

Sworn to and subscribed before me this 17th day of
February, 1961.

Josephine M. Cherry,

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. 10 FEBRUARY TERM, 1961
IN DIVORCE

EMILY M. PARRY,
Plaintiff

-vs-

FORREST F. PARRY,
Defendant

COMPLAINT

TO WITHIN NAMED DEFENDANT:

You are hereby notified
to plead to the enclosed
Complaint within Twenty (20)
Days from the service hereof.

GLEASON, CHERRY & CHERRY
Attorneys for Plaintiff

By W. C. Cherry (Atty)
1/20/61 FEB.
301
GLEASON, CHERRY & CHERRY
7-10 DAMUS BUILDING
Du Bois, PENNSYLVANIA
109 N. BRADY STREET

4/80 Atty