

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-

FORREST F. PARRY,  
Defendant.

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No. 101 FEBRUARY TERM, 1961

IN DIVORCE

CONSTABLE'S RETURN

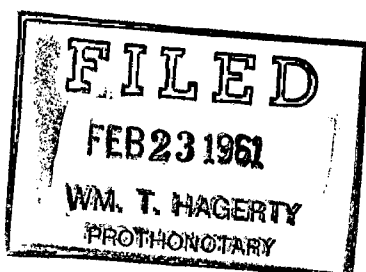
Now, February 22nd, 1961, at 11:15 A.M., E.S.T.,  
served FORREST F. PARRY, at his place of employment, Johnson's  
Body Shop, DuBois, Pennsylvania, with a true and attested copy  
of the within Complaint in Divorce No. 101 February Term, 1961  
by handing the same to and leaving with him, personally,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

FORREST F. PARRY,  
Defendant.

No. 101 FEBRUARY TERM, 1961.

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.

-2-

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 

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 17<sup>th</sup> day of February, 1961.

*Joseph M. Cherry*

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNA.  
No. 101 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

*(P) [Signature]*  
*(P) [Signature]*  
*(301) [Signature]*  
FEB 1 1961

LAW OFFICES,  
W. CHERRY & CHERRY  
GLEASON, CHERRY & CHERRY  
7-10 DAMUS BUILDING  
DU BOIS, PENNSYLVANIA

109 N. BRADY STREET

4<sup>00</sup> atty