

DOCKET NO. 174

NUMBER	TERM	YEAR
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<u>140</u>	<u>September</u>	<u>1961</u>
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John J. King

VERSUS

Sarah E. King

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

JOHN J. KING

-vs-

SARAH E. KING

No. 140 SEPTEMBER TERM, 1961

IN DIVORCE

COMPLAINT


Now comes John J. King, the plaintiff above named, and brings this Complaint in Divorce against his wife, Sarah E. King, on a cause of action whereof the following is a statement:

1. That the name of the plaintiff is John J. King and the name of the defendant is Sarah E. King.
2. That both of the said parties are adults.
3. That the said plaintiff and defendant were married on July 6, 1954 at Perrisburg, Virginia.
4. That at the time of said marriage, the plaintiff and the defendant were both natural born citizens of the United States, the plaintiff having been born in DuBois, Clearfield County, Pennsylvania; and the defendant having been born in Kittanning, Armstrong County, Pennsylvania; and that said plaintiff has resided in Pennsylvania all his life.
5. That the present residence of the plaintiff is 243 Williams Street, DuBois, Clearfield County, Pennsylvania; and the present residence of the defendant is 501 South Main Street, DuBois, Clearfield County, Pennsylvania.
6. That no prior Divorce Action has been instituted between the parties.
7. That there were two (2) children born to this marriage, viz.: Kathy Ann King, aged six years and Lisa Jane King, aged four years, both residing with the defendant at 501 South Main Street, DuBois, Clearfield County, Pennsylvania.
8. The plaintiff further avers that in violation of defendant's marriage vows and of the laws of the Commonwealth of Pennsylvania, the


said Sarah E. King, the defendant herein named, did on or about August 15, 1959, at DuBois Clearfield County, Pennsylvania, willfully and maliciously, and without reasonable cause, desert the plaintiff, and absent herself from their common habitation at DuBois, Clearfield County, Pennsylvania, and has continued in said desertion for a period of more than two (2) years, to wit: from August 15, 1959.

9. That this action is not brought out of collusion.

WHEREFORE, the plaintiff prays that he be freed and separated from the bonds of matrimony heretofore contracted between the said plaintiff and defendant and be granted a Decree in Divorce a vinculo matrimonii dissolving the bonds of the said marriage.



Plaintiff



Attorney for Plaintiff

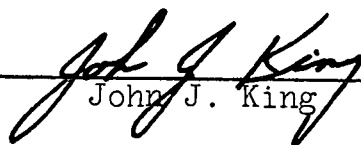
September 2, 1961.

STATE OF PENNSYLVANIA

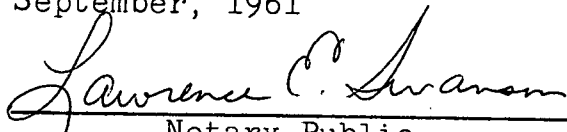
SS

COUNTY OF CLEARFIELD

Personally appeared before me, a Notary Public in and for the County and State aforesaid, JOHN J. KING, 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 himself 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.


John J. King

Sworn and subscribed to
before me this 2nd day of
September, 1961


Notary Public

Notary Public, DuBois Clearfield Co.
My Commission Expires April 11, 1962

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
No. 40 SEPTEMBER TERM, 1961

JOHN J. KING

-VS-

SARAH E. KING

COMPLAINT IN DIVORCE

To: Sarah E. King:

You are hereby notified to
plead to the enclosed com-
plaint within twenty (20)
days from service hereof.

W. T. Hagerly

FILED
Attest for Plaintiff
(E)

SEP 27 1961
W. T. Hagerly

WM. T. HAGERLY

PEOTON BROCKBANK

ATTORNEY AT LAW

7.00 SUITE 240, 242, 244 DU BOIS DEPOSIT
NATIONAL BANK BUILDING

DU BOIS, PENNSYLVANIA

6.50 *Attg*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

JOHN J. KING

-VS-

SARAH E. KING

NO. 140 SEPTEMBER TERM, 1961

IN DIVORCE

Now, October 7, 1961 at 10:30 o'clock, a.m., Eastern Daylight Saving Time, served SARAH E. KING, Defendant, at her residence, 501 South Main Street, in the City of DuBois, Clearfield County, Pennsylvania, a true and attested copy of the original Complaint in Divorce filed in this case, by handing the same to her and leaving with her, personally, and making known to her the contents thereof. And so answers.

Alex Campbell

Alex Campbell, Constable
Sandy Township, Clearfield County.

Sworn and subscribed to
before me this 9th day
of October, 1961.

Mrs. Jean M. Weaver
Notary Public

JEAN M. WEAVER, Notary Public
DUBOIS, CLEARFIELD CO., PA.

My Commission expires

~~My Commission Expires Sept 12, 1964~~



*Served by notice &
notary fee
paid 4.00*