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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

FILED
JAN 14 1946
JULIE B. HALL, Clerk
Eva S. Cloud
Shante

CICELY ANGLETON,

Plaintiff,

vs.

JAMES J. ANGLETON,

Defendant.

No. 27163

COMPLAINT IN DIVORCE

Comes now the plaintiff and alleges:

I.

That the plaintiff is now and has been for more than one year last past a bona fide resident of Pima County, Arizona; that the defendant is a nonresident of the State of Arizona and is absent from the state of Arizona; that the residence and post office address of the defendant are: Captain James Angleton, 0886353, Care of American Embassy, Rome, Italy.

II.

That plaintiff and defendant were married at Battle Creek, Michigan, July 17, 1943, and have been ever since and now are husband and wife.

III.

That one child has been born to this marriage, a son, James Charles Angleton, who was born at Tucson, Arizona, on August 17, 1944, and has been ever since and now is in the custody of the plaintiff.

IV.

That the parties hereto have no community property.

V.

That the defendant has been guilty of cruel treatment towards the plaintiff; that defendant has become so engrossed and absorbed in his work that he regards his marriage with plaintiff as an impediment that should be removed; that by reason thereof, the defendant has continuously neglected the plaintiff and has advised her that he should not be under the restraint of marriage and should be free of all marital obligations; that the defendant's attitude and actions as aforesaid have persisted for a period of more than one year, to plaintiff's mental and physical distress.

WHEREFORE, plaintiff prays judgment that the bonds of matrimony existing between the parties hereto be dissolved, that she be awarded the custody of their child, with right of reasonable visitation on defendant's part, and for such other and further relief as may be proper.

Cicely Angleton
Cicely Angleton

CONNER & JONES

By

Gerald Jones
Attorneys for Plaintiff
303-6 Valley National Building
Tucson, Arizona.

STATE OF ARIZONA)
COUNTY OF PIMA) ss.

Cicely Angleton, being first duly sworn, deposes and says: that she is the plaintiff in the foregoing complaint named; that she has read the said complaint and that the same is true in substance and in fact; that the defendant is a nonresident of the State of Arizona, is absent from the State of Arizona, and that his residence and post office address are: Captain James Angleton, 0886353, Care of American Embassy, Rome, Italy.

Cicely Angleton

Subscribed and sworn to before me this 14th day of June, 1946.

My commission expires August 12, 1948.

Charity Ross
Notary Public, Pima County, Arizona.

47
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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

1946 JUL 24 PM 3-06

BELLE D. HALL
CLERK SUPERIOR COURT
DEPUTY

CICELY ANGLETON,

Plaintiff,

vs

JAMES J. ANGLETON,

Defendant.

No. 27163

AFFIDAVIT

STATE OF ARIZONA }
COUNTY OF PIMA } ss

M. J. Van Vorst, being first duly sworn, on oath deposes and says: That he is a resident of the County of Pima, State of Arizona, and is more than twenty-one years of age and that he is a duly appointed Deputy Sheriff of Pima County, Arizona; that on the 18th day of June, 1946 he delivered a copy of the attached summons to the Southwest Veteran with instructions to publish the same on June 22, June 29, July 6, July 13 and July 20, 1946 and that said summons was published in the Southwest Veteran on said dates as appears by the attached affidavit of publication.

M. J. Van Vorst

Subscribed and sworn to before me this 24 day of July, 1946.
My Commission expires March 16, 1950.

Charles E. Conner
Notary Public, Pima County, Arizona

IN THE SUPERIOR COURT
OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

CICELY ANGLETON

PLAINTIFF

VS.

JAMES J. ANGLETON

DEFENDANT

No. 27163

SUMMONS

THE STATE OF ARIZONA TO THE ABOVE NAMED DEFENDANT

JAMES J. ANGLETON

YOU ARE HEREBY SUMMONED AND REQUIRED TO APPEAR AND DEFEND IN THE ABOVE ENTITLED ACTION IN THE ABOVE ENTITLED COURT, WITHIN TWENTY DAYS, EXCLUSIVE OF THE DAY OF SERVICE, AFTER SERVICE OF THIS SUMMONS UPON YOU IF SERVED WITHIN THE STATE OF ARIZONA, OR WITHIN THIRTY DAYS, EXCLUSIVE OF THE DAY OF SERVICE, IF SERVED WITHOUT THE STATE OF ARIZONA; AND YOU ARE HEREBY NOTIFIED THAT IN CASE YOU FAIL SO TO DO, JUDGMENT BY DEFAULT WILL BE RENDERED AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

THE NAMES AND ADDRESS OF PLAINTIFF'S ATTORNEYS ~~are~~ are: Conner & Jones,
305-6 Valley National Building, Tucson, Arizona.

GIVEN UNDER MY HAND AND THE SEAL OF THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA, THIS 14th DAY OF June, 1946.

REILE D. HALL

CLERK

BY

Eva L. Cloud

DEPUTY CLERK

SUMMONS
No. 2713
IN THE SUPERIOR COURT OF THE
STATE OF ARIZONA IN AND FOR
THE COUNTY OF PIMA
CICELY ANGLETON, Plaintiff,
vs.
JAMES J. ANGLETON, Defendant.

The State of Arizona to the above named
defendant, JAMES J. ANGLETON:

You are hereby summoned and required
to appear and defend in the above entitled
action in the above entitled court, within
twenty days, exclusive of the day of serv-
ice, after service of this summons upon you
if served within the State of Arizona, or
within thirty days, exclusive of the day of
service, if served without the State of Ari-
zona; and you are hereby notified that in
case you fail so to do, judgment by default
will be rendered against you for the relief
demanded in the complaint.

The names and address of Plaintiff's At-
torneys are: Conner & Jones, 3214 Valley
National Building, Tucson, Arizona.

Given under my hand and the seal of
the Superior Court of the State of Arizona
in and for the County of Pima, this 16th
day of June, 1946.

BELLE D. HALL,
Clerk
By EVA J. DUD,
Clerk

Counsel for Defendant, Attorney.

Served June 22, 29, July 6, 13, 20.

Affidavit of Publication

STATE OF ARIZONA,
COUNTY OF PIMA,

SS.

George Bideaux

being first duly sworn, deposes and says
that he is the Editor

of the Southwest Veteran, and that the said
Southwest Veteran, is a weekly newspaper
printed and published in the City of Tucson,
Pima County, State of Arizona, and of gen-
eral circulation in said City, County, State,
and elsewhere, and that the hereto attached

summons NO. 2713

of James J. Angleton

was printed and published correctly in the
regular and entire issues of each and every
number of said Southwest Veteran for

five successive issues; that
the first publication of said attached

summons was made on the

22d day of June

1946; and the last publication thereof was

made on the 20th day of

July, 1946; and that said

publication was made on each of the follow-
ing dates, to-wit:

June 22, 1946

June 29, 1946

July 6, 1946

July 13, 1946

July 20, 1946

Dated at Tucson, Arizona, July 20

1946

George Bideaux

Subscribed and sworn to before me this

20th day of July, 1946

My commission expires on the

day of My Commission Expires Dec. 20, 1948

Robert M. Russell

Notary Public.

47
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FILED

Aug 28 1946

BELLE D. HALL, Clerk

By M. V. Montgomery

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF PIMA

CICELY ANGLETON,

Plaintiff,

vs.

JAMES J. ANGLETON,

Defendant.

No. 27163

AFFIDAVIT

STATE OF ARIZONA }
COUNTY OF PIMA } ss.

Charity Ross, being first duly sworn, deposes and says: That she is employed in the office of Conner & Jones, attorneys at law, Valley National Building, Tucson, Arizona, and was so employed on June 14, 1946; that on that day she mailed to the defendant above named, James J. Angleton, a copy of the Summons and Complaint in the above entitled action; that the address on said envelope was: "Captain James J. Angleton, 0886353, Care of American Embassy, Rome, Italy; that said envelope bore sufficient postage and was registered at Tucson, Arizona, on said day, a receipt therefor being hereto attached; that on August 19, 1946, there was received by the office of Conner & Jones the attached registry return receipt dated July 9, 1946, bearing the acknowledgment of the receipt of said letter by James Angleton, Captain.

Further deponent sayeth not.

Charity Ross

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1 James AUGUSTON Post
(Signature or name of addressee)

2 _____
(Signature of addressee's agent—Agent should enter addressee's name on Box ONE above)

Date of delivery 2 July, 1946

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID POSTAGE DUE
(G.P.O.)

Return to

Conner & Jones

Street and Number,
or Post Office Box,

Box 310

REGISTERED ARTICLE

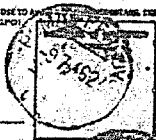
No. *30290*

INSURED PARCEL

No. _____

TUCSON,

ARIZONA.



Form 3926-B

Receipt for Registered Article No. _____

Fee paid 20 cents. Class postage _____

Declared value 10 Purchase tax paid, \$ _____

Return Receipt fee _____ Spt. Duty fee _____
Delivery restricted to addressee: _____

In person _____ or order _____ Fee paid _____
Accepting employee will place his initials in space
indicating restricted delivery.

Postmeter paid ☒

POSTMARK



The sender should write the name of the addressee on back hereof as an identification. Preserve and submit this receipt in case of inquiry or application for indemnity.

Registry Fee and Indemnity.—Domestic registry fees range from 30 cents for indemnity not exceeding \$3 up to \$1.25 for indemnity not exceeding \$1,000. The fee on domestic registered matter exceeds 4 cents for value and for which indemnity is not paid is 20 cents. Count postmeter as to value of domestic registry fees and surcharges and as to the registry fee chargeable on registered parcel-post packages for foreign countries. Fees on domestic registered C. O. D. mail range from 25 cents to \$1.20. Indemnity claims must be filed within 1 year (C. O. D. 6 months) from date of mailing.

James Angleton

Subscribed and sworn to before me this 19th
day of August, 1946.
My commission expires September 12, 1949.

- Ras O. Deering
Notary Public, Pima County, Arizona.

FILED

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

DEC 9 PM 3 22

IN AND FOR THE COUNTY OF PIMA

CLERK OF THE COURT
CLERK SUPERIOR COURT
BY *[Signature]* DEPUTY

CICELY ANGLETON,

Plaintiff,

vs

JAMES J. ANGLETON,

Defendant.

No. 27163

AFFIDAVIT ON DEFAULT

STATE OF ARIZONA)
COUNTY OF PIMA) ss.

Charles E. Conner, being first duly sworn,
deposes and says:

That he is one of the attorneys for the plaintiff in the above entitled cause; that no answer or other pleading has been served upon him for the defendant or filed with the Clerk of the Superior Court for the County of Pima, State of Arizona, herein; that service of summons was had on the defendant, and that the summons was first published on June 22, 1946, and that more than sixty days, exclusive of the first day of publication, have elapsed since the first publication of summons; that a copy of the summons and complaint was sent registered mail, return receipt requested, to the defendant, and that the affidavit of said service is on file, and that more than sixty days have elapsed since the filing of said affidavit;

WHEREFORE, affiant demands that the Clerk of the Superior Court enter default against said defendant, James J. Angleton.

Charles E. Conner
Attorney for Plaintiff

Subscribed and sworn to before me this 3rd
day of December, 1946.

My commission expires September 12, 1949.


Rae C. Decker
Notary Public, Pima County, Ariz.

47
72

IN THE SUPERIOR COURT
OF THE STATE OF ARIZONA, IN AND FOR THE COUNTY OF PIMA

TO THE CLERK

enter

PLEASE ~~ENTER HERE TO ENTER~~ DEFAULT-~~ENTER~~

FILED
1946 DEC 9 PM 3 22

against defendant

IN THE CASE OF Cicely Angleton,

DEPUTY CLERK
BY *Charles E. Conner* DEPUTY
PLAINTIFF

vs.

James J. Angleton,

DEFENDANT.

CASE NO. 27163

CONNER & JONES

By *Charles E. Conner*

ATTORNEY FOR Plaintiff

47
72

IN THE SUPERIOR COURT

FILED

OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF PIMA

DEC 9 PM 3 22

WILLIAM HALL
CLERK OF THE SUPERIOR COURT
DEPUTY

Wm. S. Hall

CICELY ANGLETON,

PLAINTIFF,

No. 87163

VS.

DEFAULT

JAMES J. ANGLETON,

DEFENDANT.

IN THIS ACTION THE DEFENDANT, James J. Angleton

HAVING BEEN REGULARLY SERVED WITH PROCESS, AND HAVING FAILED TO APPEAR AND ANSWER THE PLAINTIFF'S COMPLAINT ON FILE HEREIN, AND THE TIME ALLOWED FOR ANSWERING HAVING EXPIRED, THE DEFAULT OF SAID DEFENDANT, James J. Angleton

IN THE PREMISES IS HEREBY DULY ENTERED ACCORDING TO LAW.

GIVEN UNDER MY HAND AND THE SEAL OF SAID SUPERIOR COURT AT TUCSON, THIS

9th DAY OF December, A.D. 1946

Willi S Hall CLERK.

BY *Wm. S. Hall* DEPUTY CLERK.

43
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ROBERT A. MAY
ATTORNEY AT LAW
VALLEY NATIONAL BUILDING
TUCSON, ARIZONA

File No.
22163
LED

December 12, 1946

1946 DEC 13 PM 3 41

Capt. James J. Angleton
0-886353
c/o American Embassy
Rome, Italy

W. H. Smith
CLERK SUPERIOR COURT
VIA AIR MAIL DEPUTY
Registered- Return Receipt
Requested

Dear Sir:

As you are aware, a divorce action has been commenced against you by Cicely Angleton. The record in the case shows that service of a copy of the Complaint was made upon you by registered mail and the Return Receipt shows that you received such Complaint. Inasmuch as you did not enter an appearance in the case or file an answer therein, plaintiff's attorneys have applied for a default judgment and decree.

In compliance with the Soldiers' and Sailors' Civil Relief Act, the Court has appointed me to act as your attorney in the matter. I did not solicit the Court's appointment in this matter and I do not know your wife. I will act independently and entirely in accord with your interests in the matter, within the limitations placed upon me by law.

If you do not have a meritorious defense to the action, or if meritorious defense is not shown to the Court, the Court will no doubt permit the taking of a default judgment against you. Under the Soldiers' and Sailors' Civil Relief Act there is a possibility that such default judgment could be set aside by you after your release from service; however, the circumstances surrounding such attempts to set aside such a judgment are strictly limited and the courts are not inclined to set aside such judgments after they have appointed an attorney and given him ample opportunity to contact the defendant in Military Service.

I have read the Complaint filed in the matter and I presume you have examined your copy with care. If you do not have a meritorious defense to the Complaint or in case you desire that the divorce be granted, I would advise that you execute and return to me the Waiver which was sent to you by your wife's attorneys. I have obtained a

ROBERT A. MAY
ATTORNEY AT LAW
VALLEY NATIONAL BUILDING
TUCSON, ARIZONA

Capt. James J. Angleton --2

December 12, 1946

copy of it from them and I am enclosing it on the possibility that you may have lost or destroyed the original. Such Waiver will not be filed without my consent to the form of the Judgment and Decree entered which Judgment will not call for Court costs, alimony or support from you. I want to make it clear to you that at some future time, if the Court decided that it was for the best interests of your child, that possibly you would be required to make some contribution toward the child's welfare. I also want to make it clear that such support could be ordered by the Court whether or not the divorce decree is granted. In fact, the Court could require such support from you even though the present Divorce Complaint were withdrawn.

If, in your opinion, you have a meritorious defense to the Divorce Complaint and do not desire to permit your wife to obtain a divorce by default, please advise me by return air mail of the grounds which you feel constitute a meritorious defense. May I suggest that you take up the matter with your Regimental or Divisional Legal Officer before replying.

For your information, your wife will be entitled to the custody of the child in any event, unless you can clearly demonstrate to the Court that she is morally unfit to care for it, and the evidence of such moral turpitude must be almost overwhelming before the Court will take the custody of a child of tender years from its mother.

If a defense is to be made in this case, I will prepare the necessary papers, based upon the information which you send me, and forward them to you for signature.

May I again request that you reply to this letter just as soon as possible as the Court will no doubt grant a default decree if I do not hear from you in what the Court considers to be a reasonable time. It has now placed a limit of six weeks in which we must do whatever is to be done on your behalf.

If you have any further inquiries to make before determining your course of action, I will be glad to answer them.

Thank you.

Yours very truly,

ram:nc
Encl.

Robert A. May

ROBERT A. MAY
ATTORNEY AT LAW
VALLEY NATIONAL BUILDING
TUCSON, ARIZONA

Capt. James J. Angleton, et al.

December 12, 1946

Original sent airmail, registered mail.

cc: Sent to addressee via air mail.

cc: Sent to Superior Court of the State of Arizona, in
and for the County of Pima.

27 FEB 1947 AM 11 22

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF PIMA

THE SMALL
EVEN SUPERIOR COURT
J. E. McALLISTER, DEPUTY

CICELY ANGLETON,

Plaintiff.

-vs-

JAMES J. ANGLETON,

Defendant.

No. 27163

AFFIDAVIT

ROBERT A. MAY, being first duly sworn, deposes
and says:

That he was appointed by this Honorable Court to represent defendant in the above-captioned action, in compliance with the terms and provisions of the Soldiers' and Sailors' Civil Relief Act; that in compliance with such appointment he did, on the 12th day of December, 1946, personally mail to Captain James J. Angleton, defendant herein, a letter, copy of which was filed with this Honorable Court on the 13th day of December, 1946; that said letter was mailed Air Mail, Registered Mail, Return Receipt Requested (with a confirmatory copy sent Air Mail), which bore Tucson Post Office Registered Article No. 14227;

That the Return Receipt not having been received within a reasonable time, a special request for "tracing" of said Registered Letter was filed with the Tucson Postmaster on January 20, 1947;

That on February 12, 1947, the Return Receipt, attached hereto and made a part of this Affidavit, was received by deponent's office and was so date-stamped; that said Return Receipt indicates that it covers Registered Article No. 14227

sent by the Tucson Post Office; that your deponent has not had acknowledgment or reply of any nature from Captain James J. Angleton to said letter of December 12, 1946.

Further deponent sayeth not.

Robert A. May

STATE OF ARIZONA
COUNTY OF PIMA SS

ROBERT A. MAY, being first duly sworn, deposes and says: that he is the said attorney appointed by the Court to represent defendant in the foregoing action; that he has read the foregoing Affidavit and knows the contents thereof and that the matters therein alleged are true of his own knowledge, except those matters alleged on information and belief and as to such matters he believes them to be true.

Robert A. May

Subscribed and sworn to before me this 18 day of February, 1947.

Joan B. Hudson
Notary Public

My Commission expires:
Sept. 23, 1950

47
72

IN THE SUPERIOR COURT
OF THE STATE OF ARIZONA, IN AND FOR THE COUNTY OF PIMA

TO THE CLERK

~~PLEASE ISSUE EXECUTION,~~
~~OR~~
~~WARRANT~~
~~UNIT OF ATTACHMENT~~
PLEASE DISMISS

FILED

1946 OCT. 22 PM 1 35

BELLE D HALL
CLERK SUPERIOR COURT

IN THE CASE OF

Cicely Angleton

Grayson DEPUTY
PLAINTIFF,

VS.

James J. Angleton

DEFENDANT.

CASE NO. *27163*

Conner & Jones by James M. Conner
ATTORNEYS FOR *Plaintiff*