

That there was born to your Orator and the said Lucile Mason, the defendant, named herein, two children, one named Lorader Mason, a girl five years of age and a little girl named Clarissa Mason, three years of age; that the said Lucile Mason is not a suitable and proper person to have the

FOURTH:

That your Orator and the said Lucile Mason were lawfully married on the 11th, day of July, 1922, and lived together as husband and wife, until, to-wit:-- February 20th., 1927, at which time the said Lucile Mason committed the act of adultery with one Steve _____; that your Orator did not connive or condone said offense. Said act was committed in Baldwin County, Alabama.

THIRD:

That Lucile Mason is a resident citizen of Baldwin County, Alabama, residing at Bay Minette, Alabama; that she has resided in Baldwin County for more than three years next preceding the filing of this bill; that she is over the age of twenty one years.

SECOND:

That he is a bona fide resident citizen of Baldwin County, Alabama, residing at Bay Minette, and has resided in Baldwin County for more than three years next preceding the filing of this bill; that he is over the age of twenty one years.

FIRST:

Your Orator, Alex Mason, respectfully represents and shows unto your Honor as follows:--

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA, In Equity.

STATE OF ALABAMA, BALDWIN COUNTY. IN THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA. IN EQUITY.

HENRY D. MOORE,
Attorney for Complainant.

Defendant is required to answer every allegation contained in the foregoing bill, paragraph one to four, inclusive, but not under oath. Answer under oath is hereby expressly waived.

FOOTNOTES:-

HENRY D. MOORE,
Attorney for Complainant,

as he may in justice and equity be entitled, he will ever pray, etc.,

Honor will grant unto him such other, further, different and general relief

herein. That if Your Oration is mistaken in the relief prayed for that Your

unto Your Oration the custody and control of the said minor children named

unto Your Oration an absolute divorce from the said Lucille Mason and will grant

That upon the final hearing of this cause Your Honor will grant

PRAYER FOR RELIEF.

the time and under the penalties by law, or that the same be forever confessed.

Mason and that she be required to demur, plead to or answer the same within

publications be made as necessary to perfect service on the said Lucille

the usual process of this Honorable Court; that such orders, decrees and

said Lucille Mason be made party respondent to this bill of complaint by

THE PREMISES CONSIDERED Your Oration respectfully prays that the

the proper attention and in a suitable home;

able, ready and willing to care for his children and to see that they are given

care, control or custody of the said children and that Your Oration is