

STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. 673                      November                      Term, 193<sup>40</sup>

ANNA FELLER KUCK,  
\_\_\_\_\_ , Complainant

Vs.

JOHN H. KUCK,  
\_\_\_\_\_ , Defendant

To R. S. DUCK, \_\_\_\_\_ , Register :

In the above stated cause ~~the~~ <sup>Answer</sup> ~~Decree Pro Confesso~~ <sup>filed by</sup> having been ~~taken against~~ the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by LLOYD A. MAGNEY

\_\_\_\_\_ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

LLOYD A. MAGNEY  
Solicitor for Complainant.

**RECORDED**

No. \_\_\_\_\_ Page \_\_\_\_\_

**The State of Alabama,**

Baldwin County.

**CIRCUIT COURT, IN EQUITY**

Vs.

**REQUEST FOR DECREE IN  
VACATION**

Filed November 2nd, 1930

*R. S. Durb*

Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

Anna Feller Kuck,  
 Complainant,  
 vs.

John H. Kuck,  
 Respondent

THE STATE OF ALABAMA  
 Baldwin County

IN EQUITY  
 Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, \_\_\_\_\_  
 Answer and Stipulation; Commission to take Deposition; Testimony \_\_\_\_\_  
 of Anna Feller Kuck, the Complainant; Request for decree in vacation;

and in behalf of Defendant upon Answer.

*R. S. Duch*

Register.

Anna Feller Kuck,  
 Complainant,  
 vs.

John H. Kuck,  
 Respondent

THE STATE OF ALABAMA  
 Baldwin County

IN EQUITY  
 Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, \_\_\_\_\_  
 Answer and Stipulation; Commission to take Deposition; Testimony \_\_\_\_\_  
 of Anna Feller Kuck, the Complainant; Request for decree in vacation;

and in behalf of Defendant upon Answer.

*R. S. Durr*

Register.

No. **RECORDED**

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

vs.

**NOTE OF TESTIMONY**

Filed in Open Court this 2nd  
day of November, 1940 193

*R. S. Ditch*

REGISTER

LLOYD A. MAGNEY  
LAWYER  
FOLEY, ALABAMA  
November 5, 1940

Hon. R. S. Duck,  
Clerk of the Circuit Court,  
Bay Minette, Alabama.

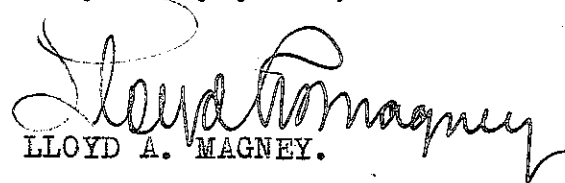
Dear Sir:

Re: Kuck vs. Kuck

Judge Hare has indicated that he will sign a decree in this case and I have forwarded one to him.

I enclose a copy herewith for your use in certifying after the signed decree has been sent to you by Judge Hare.

Very truly yours,

  
LLOYD A. MAGNEY.

LAM:C

Encl.

LLOYD A. MAGNEY  
LAWYER  
FOLEY, ALABAMA

November 1, 1940.

Hon. R. S. Duck,  
Clerk of the Circuit Court,  
Bay Minette, Alabama.


Dear Sir:0

Re: Kuck vs. Kuck

I enclose herewith the testimony in this case and wish that you would send the file to Judge Hare for ~~the~~ decree in vacation.

As soon as the decree is returned, please certify <sup>a</sup> ~~the enclosed~~ copy and send it to me with your cost bill and I will remit at once.

Very truly yours,

  
LLOYD A. MAGNEY.

LAM:C

Encl.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

ANNA FAYLER KUCK,

Complainant,

vs.

JOHN H. KUCK,

Respondent.

DEPOSITION

*Sub. E. November 2/9 40*

*H. S. ...*

LLOYD A. MAGNEY

ATTORNEY AT LAW  
FOLEY, ALABAMA



IN THE SINGLE CIRCUIT OF  
SHELBY COUNTY, ALABAMA  
IN CHANCERY

ANNA BEULIE RUCK,

Complainant,

vs:

JOHN H. RUCK,

Respondent.

DECREE

*Final Decree 7/1948*  
*Re: Anna Beulie Ruck*

LLOYD A. MAGNEY  
ATTORNEY AT LAW  
FOLEY, ALABAMA

ANNA FELLER KUCK,  
Complainant,

vs.

JOHN H. KUCK,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

ANSWER

Comes now John H. Kuck, the above named respondent, and for answer to the Bill of Complaint says:

FIRST: He admits the allegations of Part One of the Bill of Complaint.

SECOND: He admits the allegations of Paragraphs 1 and 2 of Part Two of the Bill of Complaint.

THIRD: Your respondent denies that he made any false representations to the complainant.

FOURTH: Your respondent admits that the marriage relation has never been consummated between himself and the complainant, and that they have never lived together but separated almost immediately after the marriage ceremony.

WHEREFORE, having fully answered, your respondent prays that he may go hence without day and have judgment for his costs herein expended.

  
Attorney Pro Se

RECORDED  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

ANNA FELLER KUCK,

Complainant,

vs.

JOHN H. KUCK,

Respondent.

ANSWER

*Filed October 28, 1940*  
*R. S. Dush, Register*

LLOYD A. MAGNEY,  
Attorney-at-Law,  
Foley, Alabama.

ANNA FELLER KUCK,

Complainant,

vs.

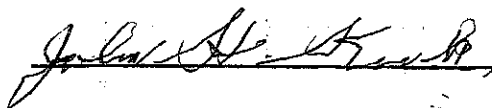
JOHN H. KUCK,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

STIPULATION

Comes now John H. Kuck, the above named respondent, and stipulates and agrees that the testimony in this case may be taken before Mary Kate Cowden, acting as commissioner, and the costs submitted on the bill, answer and testimony at any time.

  
\_\_\_\_\_

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

ANNA FELLER KUCK,

Complainant,

vs.

JOHN H. KUCK,

Respondent.

STIPULATION

*Filed October 25, 1940*  
*R. S. Duck, Register*

LLOYD A. MAGNEY  
Attorney-at-Law  
Foley, Alabama.

ANNA FELLER KUCK,

Complainant,

vs.

JOHN H. KUCK,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

DECREE

This cause coming on to be heard on the Bill of Complaint, the answer of the respondent, the stipulation of the respondent for the submission of the cause and the testimony, as noted by the Register, and was submitted to the Court and upon consideration thereof the Court finds:

That it has jurisdiction of the subject matter of this cause and the persons of the parties; that the allegations of the Bill of Complaint are true, that the marriage ceremony, which was performed on the 27th day of September, 1940, purporting to join in matrimony the complainant and the respondent, was induced by the fraud of the respondent and was of no real force or effect; that no legal marriage relationship ever came into existence as between the complainant and respondent by reason of said ceremony; that the marriage relationship has never been consummated between the complainant and the respondent and that the said marriage ought to be and the same hereby is declared to be null and void and of no force or effect.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the marriage ceremony between the complainant, Anna Feller Kuck, and the respondent, John H. Kuck, performed on the 27th day of September, 1940 be, and the same hereby is declared null and void; that the marriage relationship between complainant and respondent be and the same hereby is annulled, set aside, cancelled and held for naught and the parties released from the obligation of the same and that complainant pay the costs of this action, taxed at \$

Dated this 7<sup>th</sup> day of November, 1940.

J. W. Hare  
Judge.

The State of Alabama, }  
BALDWIN COUNTY

CIRCUIT COURT. (Equity)

Term, 1940

*Answer to John H. Hinch, Complainant*  
No. 673 vs. *Respondent*  
*John H. Hinch*

BILL OF COSTS

REGISTER'S FEES	AMOUNT	SHERIFF'S FEES:	AMOUNT
Fees in Circuit Court—		Summoning on Bill, Each Defendant.....	1.50
Docketing Cause, One fee only of.....	1.00	Executing Writ of Injunction, or Ne Exeat, each..	1.50
Issuing Summons on Bill, each.....	.50*	Executing Subpoenas for Witnesses, each.....	.65
Issuing Copies Thereof, each.....	.40	Executing Writs of Possession, each.....	5.00
Entering Return of Same, each.....	.15	Executing Scire Facias or Notice, each.....	1.50
Orders of Publication to Non-Residents, each.....	1.00*	Taking and Approving Bonds, each.....	1.00
Filing Bill or Other Paper, each.....	.10	Impaneling Jury.....	.75
Copies of Same, Per 100 Words.....	.15	Collecting Execution for Costs Only, each.....	1.50
Entering Appearances, each.....	.25*	Sheriff's Commissions.....	
Issuing Writs of Injunction, Ne Exeat, each.....	1.50		
Issuing Copies Thereof, each.....	.50		
Entering Return of Same, each.....	.15		
Decrees Pro Confesso, each.....	1.00*		
Order Appointing Guardian Ad Litem, each.....	1.00*		
Issuing Commissions to Take Testimony, each.....	.50		
Taking Testimony, Per Day.....	1.50		
Taking Testimony, Per 100 words.....	.20		
Receiving and Filing Depositions, each pkg.,.....	.10		
Indorsing Depositions Published, each pkg.,.....	.10		
All Entries on Commission Docket, Each Cause.....	.50		
Entering Order Submitting Cases for Decree, each.....	.50		
Other Orders of Court, each.....	.25		
Noting Testimony on Hearing of Cause, each.....	.50		
Entering Decrees, of 500 Words or Less, each.....	.75		
Per 100 words over 500.....	.15		
Taking Accounts, etc., on Ref., per Day.....	3.00*		
Taking Testimony on Reference Relating to Trustee, etc., per 100 words.....	.15		
Reference and Reports, each.....	2.00*		
Reports of 500 Words or Less.....	2.50		
Per 100 Words over 500.....	.15		
Issuing Subpoenas for Witnesses, each.....	.25		
Issuing Witness Certificates, each.....	.25		
All Entries on Subpoena Docket, each Cause.....	.50		
Taking and Approving Bonds, each.....	1.00		
Making Complete Record, per 100 Words.....	.15		
Hearing, etc., Regarding Appointment of Re- ceiver or Trustee.....	3.00		
Settlements with Receiver or Trustee, each.....	3.00		
Examining Vouchers in Settlements, each.....	.10		
Examining Answers on Exceptions, each Answer.....	3.00		
Removal Disabilities on Non-Age.....			
Commissions on Sales.....			
Making Deeds to Property Sold, each.....	2.00		
Receiving and Paying Out Money Other Than That Arising from Sales.....			
Certificates or Affidavits, with Seal, each.....	.50		
Certificates or Affidavits without Seal, each.....	.25		
Issuing Scire Facias or other Notice, each.....	.50		
Other Orders of Register, except Cont., each.....	.50		
Entering Certificates of Supreme Court, each.....	.50		
Transcript for Supreme Court, per 100 words, each.....	.15		
Additional Copies, per 100 words.....	.05		
Appeal Bond, each.....	1.00		
Certificate of Appeal, each.....	.50		
Notice of Appeal, each.....	.50		
Report to State Board of Health, each case.....	.50		
Certificate of Judgment, each.....	.25		
Issuing Executions, each.....	.75		
Entering Returns Thereof, each.....	.15		
<i>Amplified copy of Decree</i>			
<b>Total Register's Fees</b> .....	<b>7.25</b>		
		<b>SUMMARY OF FEES, COSTS, AND JUDGMENT</b>	
		Fees in Circuit Court—	
		Register's Fees.....	7.25
		Ex-Register's Fees.....	
		Sheriff's Fees.....	
		Ex-Sheriff's Fees.....	
		Witness Fees.....	
		Commissioner's Fees.....	
		Guardian Ad Litem.....	
		Publisher's Fees.....	
		Solicitor's Fees.....	
		Court Reporter's Fees, Per Day or fraction thereof.....	5.00
		Trial Tax.....	3.00
		Fees and Costs in Inferior Court:	
		Clerk of Inferior Court Fees.....	
		Sheriff's Fees.....	
		Witness Fees.....	
		<b>Total Fees and Costs in Inferior Court</b> .....	<b>10.25</b>
		<b>Total Fees and Costs</b> .....	
		<b>Judgment</b> .....	
		<b>Total Fees, Costs, and Judgment</b> .....	

I certify that the within is a true and correct Bill of Costs in the within styled cause.

ATTEST:

Register Circuit Court, Baldwin County, Ala.

Received payment this \_\_\_\_\_ day of \_\_\_\_\_ 194\_\_\_\_\_

ATTEST:

Register Circuit Court, Baldwin County, Ala.

No. 673

Page \_\_\_\_\_

The State of Alabama,  
BALDWIN COUNTY

CIRCUIT COURT

*Anna Feller Kuch,*

*Complainant*

vs.

Plaintiff

*John N. Kuch,*

*Respondent*

Defendant

EQUITY COST BILL

Term, 19\_\_\_\_\_

Fee Book \_\_\_\_\_, Page \_\_\_\_\_

Plaintiff's Attorney.

Defendant's Attorney.



I certify that the within is a true and correct Bill of Costs in the within styled cause.

ATTEST:

Register Circuit Court, Baldwin County, Ala.

Received payment this \_\_\_\_\_ day of \_\_\_\_\_ 194\_\_\_\_\_

ATTEST:

Register Circuit Court, Baldwin County, Ala.

No. 673

Page \_\_\_\_\_

The State of Alabama,  
BALDWIN COUNTY

CIRCUIT COURT

*Anna Fuller Kuch*

*Complainant*

vs.

Plaintiff

*John N. Kuch, Respondent*

Defendant

EQUITY COST BILL

Term, 19\_\_\_\_\_

Fee Book \_\_\_\_\_, Page \_\_\_\_\_

Plaintiff's Attorney.

Defendant's Attorney.

The State of Alabama, }  
BALDWIN COUNTY

CIRCUIT COURT. (Equity)

*March* Term, 194 *0*

*Answer Fuller Nash, Complainant*  
No. *673* vs.  
*John N. Nash, Respondent*

BILL OF COSTS

REGISTER'S FEES	AMOUNT	SHERIFF'S FEES:	AMOUNT
Fees in Circuit Court—		Summoning on Bill, Each Defendant.....	1.50
Docketing Cause, One fee only of.....	1.00	Executing Writ of Injunction, or Ne Exeat, each..	1.50
Issuing Summons on Bill, each.....	.50*	Executing Subpoenas for Witnesses, each.....	.65
Issuing Copies Thereof, each.....	.40	Executing Writs of Possession, each.....	5.00
Entering Return of Same, each.....	.15	Executing Scire Facias or Notice, each.....	1.50
Orders of Publication to Non-Residents, each.....	1.00*	Taking and Approving Bonds, each.....	1.00
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Issuing Commissions to Take Testimony, each.....	.50		
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Making Complete Record, per 100 Words.....	.15		
Hearing, etc., Regarding Appointment of Re- ceiver or Trustee.....	3.00		
Settlements with Receiver or Trustee, each.....	3.00		
Examining Vouchers in Settlements, each.....	.10		
Examining Answers on Exceptions, each Answer.....	3.00		
Removal Disabilities on Non-Age.....	..		
Commissions on Sales.....	..		
Making Deeds to Property Sold, each.....	2.00		
Receiving and Paying Out Money Other Than That Arising from Sales.....	..		
Certificates or Affidavits, with Seal, each.....	.50		
Certificates or Affidavits without Seal, each.....	.25		
Issuing Scire Facias or other Notice, each.....	.50		
Other Orders of Register, except Cont., each.....	.50		
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Transcript for Supreme Court, per 100 words, each.....	.15		
Additional Copies, per 100 words.....	.05		
Appeal Bond, each.....	1.00		
Certificate of Appeal, each.....	.50		
Notice of Appeal, each.....	.50		
Report to State Board of Health, each case.....	.50		
Certificate of Judgment, each.....	.25		
Issuing Executions, each.....	.75		
Entering Returns Thereof, each.....	.15		
<i>Certified Copy of Record</i>			
<b>Total Register's Fees</b> .....	<b>7.25</b>		
		<b>Total Sheriff's Fees</b> .....	
		<b>SUMMARY OF FEES, COSTS, AND JUDGMENT</b>	
		<b>Fees in Circuit Court—</b>	
		Register's Fees.....	7.25
		Ex-Register's Fees.....	
		Sheriff's Fees.....	
		Ex-Sheriff's Fees.....	
		Witness Fees.....	
		Commissioner's Fees.....	
		Guardian Ad Litem.....	
		Publisher's Fees.....	
		Solicitor's Fees.....	
		Court Reporter's Fees, Per Day or fraction thereof.....	5.00
		Trial Tax.....	3.00
		<b>Fees and Costs in Inferior Court:</b>	
		Clerk of Inferior Court Fees.....	
		Sheriff's Fees.....	
		Witness Fees.....	
		<b>Total Fees and Costs in Inferior Court</b> .....	<b>10.25</b>
		<b>Total Fees and Costs</b> .....	
		<b>Judgment</b> .....	
		<b>Total Fees, Costs, and Judgment</b> .....	

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

ANNA HELLER KUCK,

Complainant,

vs.

JOHN H. KUCK,

Respondent.

BILL OF COMPLAINT

*Filed October 25 1940  
H. S. Dick, Register*

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT

TO MARY KATE COWDEN

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine ANNA FELLER KUCK

as witnesses in behalf of Complainant, in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

ANNA FELLER KUCK

and Complainant  
JOHN H. KUCK

Defendant,  
on oath to be by you administered, upon them

to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 25th day of October, 19 40

*R. L. Dumb*

REGISTER

Commissioner's Fee \$5.00

Witness' Fees. \$



ANNA FELLER KUCK

Complainant,

vs.

JOHN H. KUCK.

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

DEPOSITION

Anna Feller Kuck, being first duly and solemnly sworn on oath did depose and say:

My name is Anna Feller Kuck and I am the complainant in the above entitled action. I was married to the respondent, John H. Kuck, on September 27th, 1940 in Bay Minette, Alabama.

I am 69 years old and for more than thirty years have lived on a farm near Elberta, Alabama. I was married to Fred Feller on November 2nd, 1910 and lived with him as his wife until January 25th, 1933, when he died. We had no children.

He left me 120 acres of land, on which we had made our home. However, only 28 acres of this is cleared and in cultivation, the rest of it being wood land. Since his death, I have made my own living by renting out the cultivated land for about enough to pay the taxes, raising chickens, selling eggs and milking two or three cows.

I am getting to an age, however, where the work necessary to make my living in this way is hard for me and, when I met the respondent<sup>and</sup>/he wanted to marry me for companionship and to make a home for him, I was interested, as he told me he had money and property and an income sufficient to enable us to live well without me doing anything except keeping house for him.

I became acquainted with him at the church which we both attended, and he told me that his wife had died recently and that he needed someone to make a home for him and that he was able to and would support me in comfort, and I would not have to do any work, except keep house for him.

I made no investigation of his finances but took his word, and we were married.

No sooner was the ceremony performed, before we even went home, he wanted me to go to a lawyer and make a will, leaving all my property to his children. I refused to do this and his attitude toward me began to change at once. When we got to my home he notified me that it would be necessary to sell all the wood and timber off my land and that we would have to make our living off of what we could sell from the farm, as he had no money and had been delayed in collecting money which he expected.

When I refused to have the wood cut or to sell anything off the farm to provide our living, he said that he guessed it had been a mistake that we ever got married.

By that time it was obvious to me that he had married me with the idea that I had money and property and would support him, and I too recognized that I had made a mistake. I went and talked to my good friends and neighbors of many years, Mr. Salzman and Mr. Paul Haupt, and they both advised me that I should take immediate steps to have the marriage annulled.

We never did live together as man and wife and he took the few belongings he had brought to my house and left the next day.

I relied upon his representations as to his ability to take care of me and was deceived by him into believing that he could and would do so, and discovered as soon as the marriage ceremony was performed that his whole idea was to marry me for what little I had, and to force me to take care of and support him and, on such a basis, a happy marriage between us was impossible and, the marriage between us never having been consummated, I now ask that the court declare it a nullity.

Anna Feller Huck

C E R T I F I C A T E

STATE OF ALABAMA }  
BALDWIN COUNTY }

I, Mary Kate Cowden, by virtue of the attached Commission To Take Depositions, commissioner to take the testimony of Anna Feller Kuck, do hereby certify that on the 31st day of October, 1940, I caused the said Anna Feller Kuck to appear before me in my office at Foley, Alabama; that after being duly sworn, the testimony of said witness was by me taken down in shorthand, later reduced to typewriting, read over by the witness and subscribed by her.

That I have personal knowledge of the identity of said witness and am not of counsel or kin to any of the parties to this cause, and have no interest in the result of the same.

IN WITNESS WHEREOF: I have hereunto set my hand this 1st day of November, 1940.

Mary Kate Cowden  
Commissioner



ANNA FELLER KUCK,

Complainant

vs.

JOHN H. KUCK,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

BILL OF COMPLAINT

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your complainant respectfully shows unto Your Honor that she is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, residing at Elberta therein, and that the respondent, John H. Kuck is also over the age of twenty-one years and a resident of Baldwin County, Alabama, residing at Robertsedale, therein.

PART TWO

Your complainant further avers:

1. That she is 69 years of age and the respondent 81.
2. That the parties were married in Bay Minette, Alabama on the 27th day of September, 1940.
3. That your complainant was induced to enter into a contract of marriage with the respondent by the false and fraudulent representations of the respondent; that her consent to such marriage contract was obtained from her by the fraud of the respondent, which fraud consisted of this: The respondent represented to your complainant that he was a man of wealth and possessed of an income from investments which would enable him to support your complainant in comfort in her declining years and that he desired marriage with your complainant for companionship in his old age, and that his income was ample to support them both in comfort, whereas, the fact is, that the said respondent is not a man of wealth and has no income which would enable him to support himself and your complainant in comfort and, as soon as the marriage ceremony was completed he notified your complainant that they would have to live

in her home and on her money as he had no money with which to support them.

3. That because of the advanced age of the parties, the marriage between them was understood to be one of convenience which would result in company and companionship for the respondent and a home and the necessities and some of the comforts of life for your complainant, and that the fraud and deceit of the respondent, practiced upon your complainant as aforesaid, went to the essentials of the proposed relationship between them and was such a fraud upon your complainant as to make a happy married life with the respondent impossible.

4. That your complainant believed the representations of the respondent and relied upon them and, not until after the marriage ceremony, did the respondent inform her to the contrary.

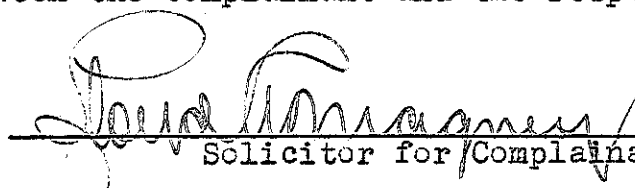
5. That the marriage relation has never been consummated between your complainant and the respondent; they have never lived together but separated almost immediately after the marriage ceremony and as soon as your complainant learned from the respondent of the falsity of his representations to her, and the contract between them is based upon and was procured by the fraud of the respondent, and in equity and in good conscience ought to be annulled.

PRAYER FOR PROCESS

WHEREFORE, your complainant prays that Your Honor will grant to her the writ of summons of the State of Alabama, directed to the respondent, John H. Kuck, and requiring him to answer, plead or demur to this Bill of Complaint within the time allowed by law and to abide such order and decree as may be entered herein; and your complainant shall ever pray, etc.

PRAYER FOR RELIEF

Your complainant further prays that upon final hearing of this cause, Your Honor will make and enter a decree cancelling the marriage contract between the respondent and herself and annulling the marriage relation between the complainant and the respondent.

  
Solicitor for Complainant.