

FRED T. HADLEY,
Complainant,
VS.
INEZ HADLEY,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER _____

ANSWER

Now comes the Respondent in the above entitled cause and for answer to the Bill of Complaint says:

1. Respondent admits the allegation of paragraph Numbered 1.
2. Respondent admits that she was married to the Complainant at Bretwon, Alabama, on September 15, 1934, but denies all of the other allegations of paragraph Numbered 2.
3. Respondent denies that she voluntarily abandoned the bed and board of the Complainant and further denies that she has remained away voluntarily and continuously since that time. For further answer to this paragraph of the Bill of Complaint, Respondent alleges that she and the Complainant have lived together as man and wife during the last two years and until May 1, 1942.
4. For further answer to the Bill of Complaint, Respondent alleges that there is a case pending against the Complainant in the Juvenile Court of Baldwin County, Alabama, where he is charged with non-support of the Respondent and his minor child. Respondent further alleges that while the case was pending and before it was brought to trial the Complainant left the State of Alabama and is now a fugitive from justice.

Having fully answered the Bill of Complaint, Respondent prays that it be dismissed and that she be discharged with her reasonable costs in this behalf expended.

J. B. Blackburn
Solicitor for Respondent.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon INEZ HADLEY to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by FRED T. HADLEY against INEZ HADLEY, and further to do and perform what said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court, immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of the Circuit Court, this the 19th day of August, 1942.

R. S. Duck
Register.

FRED T. HADLEY, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

INEZ HADLEY, RESPONDENT.

IN EQUITY;

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

Now comes your Complainant, FRED T. HADLEY, and humbly complaining against the Respondent, INEZ HADLEY, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age;

2.

The Complainant and the Respondent are husband and wife having married at Brewton, Alabama, on September 15, 1934; and that they lived together as husband and wife in Baldwin County, Alabama, until the latter part of 1939;

3.

That in the latter part of 1939, the Respondent voluntarily abandoned the bed and board of the Complainant, and has remained away voluntarily and continuously since that time.

PRAYER FOR PROCESS

Wherefore, the premises considered, your Complainant prays that your Honor will by proper process, make the said INEZ HADLEY party respondent to this Bill of Complaint, requiring her to plead, answer or demur to the same within

the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; and that your Honor will give and grant unto him such other, further, different and general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

By: Y. H. Hall
Solicitors for Complainant.

Received in Sheriff's Office
this 19 day of Aug, 1942
W. R. STUART, Sheriff

Executed August 31st 1942
by serving copy of within Summons and
Complaint on

Inez Hadley

the defendant

W.R. Stuart Sheriff
[Signature] Deputy Sheriff

FRED T. HADLEY, COMPLAINANT,

VS.

INEZ HADLEY, RESPONDENT.

RECORDED

SUMMONS AND COMPLAINT.

Filed Aug 19 1942
[Signature]

BEEBE & HALL

Attorneys at Law

Responsible for [unclear]
[unclear]
[unclear]

856
Hadley

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ANSWER

~~RECORDED~~

FRED T. HADLEY,

Complainant,

VS.

INEZ HADLEY,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Filed Sept 30 1945
Produced
Gray