

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

Comes your complainant, BUENOS HALL, and humbly complaining against HAMILTON HALL, respectfully represents and shows unto your Honor as follows:

FIRST:

That she is a bona fide resident of Baldwin County, Alabama, and has been for more than three years next preceding the filing of this Bill of Complaint; that she is over twenty-one years of age; that the respondent, Hamilton Hall, is over twenty-one years of age and a resident of Baldwin County, Alabama.

SECOND:

That your complainant and the respondent were married at Pascagoula, Mississippi, on February 2, 1929, and lived together as man and wife in Baldwin County, Alabama, until in, to-wit, December, 1931.

THIRD:

That on, to-wit, in December, 1931, and on various other occasions the respondent abused and threatened your complainant, and on, to-wit, December 31, 1931, did actual violence to her person by striking her with his fist; that the actions and conduct of the respondent was such as to cause your complainant to have reasonable apprehension to believe and she does believe that the respondent will do further violence to her which will be attendant with danger to her life and health should she continue to live with him.

FOURTH:

That there was born to said marriage one child, a girl, about two years old, named Nita Hall; that said child

has been with her mother, your complainant, all of the child's life; that your complainant is able and willing and is the proper person to have the care, custody and control of said child.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper process make the said Hamilton Hall party respondent to this Bill of Complaint, requiring him 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.

PRAYER FOR RELIEF.

Your complainant further prays that upon a final hearing of this cause your Honor will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the respondent, Hamilton Hall; that your Honor will enter a further order and decree awarding the custody and control of said child, Nita Hall, to your complainant; that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive. And as in duty bound your complainant will ever pray.

Beebe & Stoll
Attorneys for Complainant.

FOOT NOTE:

The respondent is required to answer each and every allegation of the foregoing Bill of Complaint from Paragraph "FIRST" to "FOURTH" inclusive, but not under oath, oath being hereby expressly waived.

Beebe & Stoll
Attorneys for Complainant.