

Jim Hadley, Complainant.

In Circuit Court of Baldwin County,  
Alabama, In Equity.

v.  
Elizabeth Hadley, Respondent.

To the Honorable F. W. Hare, Judge of the 31st., Judicial Circuit:-

Your complainant, Jim Hadley, humbly complaining alleges and complains, that he and Elizabeth Hadley were married in Bay Minette, Alabama about 19 years ago and that both are over the age of 21 years.

That your complainant has been a bona fide resident of Baldwin County, Alabama for more than 10 years next ~~xxxxxxxxxxxx~~ preceding the filing of the complaint in this cause, and that the said Elizabeth Hadley is now a resident of Pensacola, Florida, residing at 508 North C. Street, Pensacola, Florida.

That the respondent, Elizabeth Hadley, on to-wit:- April 1941, left your complainant and went off with another man, to-wit:- Frank Jackson, and your complainant has been informed and does believe that respondent has lived with the said Frank Jackson since she left complainant and is still living with the said Frank Jackson.

~~xxxxxxxxxx~~ Complainant avers that he has in no way condoned the offense of adultery on the part of respondent.

Complainant, Jim Hadley, requests that the said Elizabeth Hadley, who resides at 508 North C. Street, Pensacola, Florida, be made a party respondent to this bill of complaint, and that she be served with notice of this proceeding by service by registered mail, and that all necessary proceedings be had to perfect service on her, and that on the hearing thereof, your Honor will take jurisdiction of this cause and grant to your complainant a decree dissolving the bonds of matrimony existing between complainant and respondent, and for such other and further relief as in equity may seem proper, for which your complainant will ever pray etc.

*W. H. Hawkins*

Solicitor for Complainant.

407

Jim Hadley, Compl't.

vs.

Elizabeth Hadley,

Respondent.

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Bill for divorce.  
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*Filed July 16 1943*

*W. E. Haskins, Ref*

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Solicitor for Complainant

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,  
BALDWIN COUNTY

No. 907.

CIRCUIT COURT BALDWIN COUNTY,  
Feb, \_\_\_\_\_ TERM, 194-43

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon Elizabeth Hadley

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against Elizabeth Hadley

\_\_\_\_\_, Defendant

by Jim Hadley.

\_\_\_\_\_, Plaintiff

Witness my hand this 16th day of February. 194 3

[Signature]  
Clerk.

RECORDED

No. 907.

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

Jim Hadley

Plaintiffs

vs.

~~XXXXXXXXXX~~ Elizabeth Hadley.

Defendants

SUMMONS AND COMPLAINT

Filed Feb/ 16th 1943

*Roduck* Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

194

Sheriff

I have executed this summons

this 194

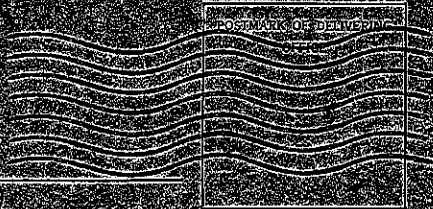
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Sheriff

Deputy Sheriff

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No. \_\_\_\_\_ State \_\_\_\_\_

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\_\_\_\_\_ (Street and number)

\_\_\_\_\_ (Address)

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or order \_\_\_\_\_

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Form 3811  
Rev. 1-1-10

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