

TO THE HONORABLE FRANCIS W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ARABAMA; SITTING IN EQUITY:

Comes CLARENCE BUCHANAN and by this, his Bill of Complaint, presented against MARGUERITE N. BUCHANAN, respectively shows:

FIRST: That he is over the age of Twenty years and the Defendant over the age of Eighteen years and both are now and have been all of their lives bona fide residents of the County of Baldwin. That they were married in the month of February, 1943 and lived together at Battles Wharf up to May 14, 1943 when she voluntarily abandoned him and is now living elsewhere in Baldwin County.

SECOND: That within the last few weeks prior to this date, the Defendant became infatuated with one Clarence Beck of Mobile with whom she now associates and for whom she has abandoned Complainant.

THIRD: Complainant now charges the Defendant with adultery committed with said Clarence Beck in both Mobile and Baldwin Counties, but the exact times and places are unknown to Complainant.

THE PREMISES CONSIDERED, Complainant prays that Marguerite N. Buchanan be made party defendant to this bill and by appropriate process, required to answer same within the time prescribed by law.

Complainant further prays that upon the hearing of this cause, a decree be rendered forever divorcing him from the said Marguerite N. Buchanan, granting him the right to marry again should he so desire, and such other, further or different relief as to equity may seem meet.

Solicitor for Complainant