

JIMMEY L. WHATLEY,
Complainant,

Vs.

MARY M. WHATLEY,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, A ALBAMA,

IN EQUITY.

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

Comes your Complainant Jimmey L. Whatley humbly complaining of the Respondent Mary M. Whatley in a matter of divorce as will hereinafter appear, and shows unto your Honor and unto this Court as follows:-

FIRST:

That your Complainant is twenty-one years of age and is a citizen of Stockton in Baldwin County, Alabama, having resided there all his life; that your Complainant is now in the Armed Forces of the United States of America and at the present time is stationed at Nashville, Tennessee; that the Respondent Mary M. Whatley is nineteen years of age and is a resident of Summerdale in Baldwin County, Alabama,

SECOND:

Your Complainant further shows unto your Honor that on April 28, 1942 he and the Respondent were married to each other and they lived together as man and wife in Stockton in Baldwin County, Alabama, until he went into the Armed Forces of the United States of America. That about four months ago while home on a furlough your Complainant stayed with the Respondent as man and wife for about three or four days; After returning to camp your Complainant was informed that the Respondent had moved to Summerdale and was living in adultery with one George Hall, a man about thirty-five years of age. That your Complainant reached Baldwin County on another furlough seven days prior to the filing of this suit and has learned that the Respondent is living in adultery with George Hall in Summerdale; Your Complainant has not stayed

in the same house with his wife on this furlough nor has he lived with her as man and wife, nor in any other way condoned her acts of adultery.

PRAYER FOR PROCESS AND RELIEF.

The premises considered, your Complainant prays that your Honor will cause the usual writ of process to issue to the said Mary M. Whatley, making her a party defendant to this bill of complaint and requiring her to plead, answer or demur to the same within the time as prescribed by law and the rules of this honorable court. Your Complainant further prays that upon a final hearing of this cause that your Honor will grant to him an absolute divorce from the said Mary M. Whatley; that your Honor will permit him to remarry if he sees fit to do so. Your Complainant further prays for such other, further, different and general relief as in equity may seem just and meet, and your Complainant will ever pray.

responder.
LIVED VAGUELY SINCE 1938.
IM BEGILLA.
BY THE COURT.
IM THE CIRCULAR COURT OF
responder.
MEXA N. MEXALTE
as.
Complainant.
MEXA F. MEXALTE
Complainant.
BY THE COURT.
RECORDED

105

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }

BALDWIN COUNTY

No. _____

CIRCUIT COURT BALDWIN COUNTY

August,

TERM, 194 3

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon Mary M Whatley.

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 _____

Mary M Whatley.

Defendant

by _____

Jemmy I Whatley.

Plaintiff

Witness my hand this 7th day of August. 194 3



Clerk.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. _____

CIRCUIT COURT BALDWIN COUNTY

August, 1943 TERM, 1943

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Mary M Whatley.

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 _____

Mary M Whatley., Defendant

by Jorney L Whatley.

Plaintiff

Witness my hand this 7th day of August. 1943

[Signature] Clerk.

JIMMEY L. WHATLEY,
Complainant,
Vs.

MARY M. WHATLEY,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, A ALBAMA.

IN EQUITY.

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

Comes your Complainant Jimmey L. Whatley humbly complaining
of the Respondent Mary M. Whatley in a matter of divorce as will
hereinafter appear, and shows unto your Honor and unto this Court
as follows:-

FIRST:

That your Complainant is twenty-one years of age and is a
citizen of Stockton in Baldwin County, Alabama, having resided
there all his life; that your Complainant is now in the Armed
Forces of the United States of America and at the present time is
stationed at Nashville, Tennessee; that the Respondent Mary M.
Whatley is nineteen years of age and is a resident of Summerdale
in Baldwin County, Alabama,

SECOND:

Your Complainant further shows unto your Honor that on
April 28, 1942 he and the Respondent were married to each other
and they lived together as man and wife in Stockton in Baldwin
County, Alabama, until he went into the Armed Forces of the United
States of America. That about four months ago while home on a
furlough your Complainant stayed with the Respondent as man and
wife for about three or four days; After returning to camp your
Complainant was informed that the Respondent had moved to Summer-
dale and was living in adultery with one George Hall, a man about
thirty-five years of age. That your Complainant reached Baldwin
County on another furlough seven days prior to the filing of this
suit and has learned that the Respondent is living in adultery
with George Hall in Summerdale; Your Complainant has not stayed

in the same house with his wife on this furlough nor has he lived with her as man and wife, nor in any other way condoned her acts of adultery.

PRAYER FOR PROCESS AND RELIEF.

The premises considered, your Complainant prays that your Honor will cause the usual writ of process to issue to the said Mary M. Whatley, making her a party defendant to this bill of complaint and requiring her to plead, answer or demur to the same within the time as prescribed by law and the rules of this honorable court. Your Complainant further prays that upon a final hearing of this cause that your Honor will grant to him an absolute divorce from the said Mary M. Whatley; that your Honor will permit him to remarry if he sees fit to do so. Your Complainant further prays for such other, further, different and general relief as in equity may seem just and meet, and your Complainant will ever pray.

Jimmy L. Whatley

Complainant.

982

RECORDED

BILL OF COMPLAINT

Complainant,
 JIMMEY L. WHATLEY,
 Complainant,
 Vs.
 MARY M. WHATLEY,
 Respondent.

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

FILED AUGUST 26, 1943.
 Register.

of adultery.
 with her as man and wife, nor in any other way condoned her acts
 in the same house with his wife on this although nor has he lived

PRAYER FOR PROCESS AND WRIT.

The premises considered, your Complainant prays that your
 Honor will cause the usual writ of process to issue to the said
 Mary M. Whatley, making her a party defendant to this bill of com-
 plaint and requiring her to plead, answer or demur to the same
 within the time as prescribed by law and the rules of this honor-
 able court. Your Complainant further prays that upon a final
 hearing of this cause that your Honor will grant to him an appro-
 priate divorce from the said Mary M. Whatley; that your Honor will
 permit him to remarry if he sees fit to do so. Your Complainant
 further prays for such other, better, different and general

RECORDED

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

JIMMEY L. WHATELY,

Complainant,

-VS-

MARY M. WHATELY,

Respondent.

ANSWER.

*Answer filed
D. Whately
July 7, 1943*

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

Defendant lives at _____

RECEIVED IN OFFICE

194

Plaintiffs

vs.

Defendants

SUMMONS AND COMPLAINT

Filed _____ 194

Clerk

Sheriff

I have executed this summons

this _____ 194
by leaving a copy with _____

Plaintiff's Attorney

Sheriff

Defendant's Attorney

Deputy Sheriff

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

_____ Plaintiffs

vs.

_____ Defendants

SUMMONS AND COMPLAINT

Filed _____ 194 _____

_____ Clerk

_____ Plaintiff's Attorney

_____ Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

_____ 194 _____

_____ Sheriff

I have executed this summons

this _____ 194 _____

by leaving a copy with _____

_____ Sheriff

_____ Deputy Sheriff