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JIMMEY L. WHATLEY,

Complainant,

W. D.

MARY M. WHATLEY.

Respondent.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, A ALBAMA.

IN EQUITY.

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

Comes your Complainent 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:-

# FIECT:

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 Tril 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 comp 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 pouse 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.

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

relief as in equity may seem just and meet, and your Complainant
will ever pray.

Yello January Januar

	CIRCUIT COURT BALDWIN COUNTY
THE STATE OF ALABAMA, \ No	
BALDWIN COUNTY	August TERM, 194 3
O ANY SHERIFF OF THE STATE OF ALABAMA	
You are hereby commanded to summon	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
Mery M Whatley.	, Defendant
by Jornaey L Whatley.	
	Plaintiff—
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JIMMEY L. WHATLEY,

Complainant,

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

ANSWER.

-VS-

MARY M. WHATLEY,

Respondent.

Comes now the Respondent and for answer to the Bill of Complaint says:

- 1: She admits the averments of Part First of said Bill.
- 2: She further admits the marriage between Complainant and herself and that they lived together as averred but denies each and every other allegation of fact in said Bill contained.

WHEREFORE, having fully answered your Respondent prays that the Complainant take nothing by his bill, that the same be dismissed and that she have judgment for her costs herein expended.

Maryon. Whitley

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JIMMEY L. WHATLEY,

Complainant,

Vs.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, A ALBAMA.

IN EQUITY.

MARY M. WHATLEY,

Respondent.

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### FIRST:

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#### SECOND:

Your Complainant further shows unto your Honor that on pril 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 Rispondent is living in adultery with George Hall in Summerdale; Your Complainant has not stayed

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Complainant.

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# PRAYER FOR PROCESS AND BELIEF.

The premises considered, your Complainant prays that your Monor will cause the usual writ of process to issue to the seld 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

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IN THE CIRCUIT COURT OF BEALDWIN COUNTY, ALABAMA BEALDWIN COUNTY, ALABA

BILL OF COMPLAINT.

BILL OF COMPLAINT.

JIMMEY L. WHATLEY

VS.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA. IN CHANCERY.

JIMMEY L. WHATLEY,

Complainant,

-VS-

MARY M. WHATLEY,

Respondent.

ANSWER.

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Moore Printing Co., Bay Minette, Ala.