

STATE OF ALABAMA  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, THAT you summon MAZIE BRADLEY to be and appear before the Judge of the Circuit Court of Baldwin County, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by WATSON BRADLEY and against the said MAZIE BRADLEY, and further to to and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further commend that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this the 20 day of October, 1943.

*R. S. Duck*  
\_\_\_\_\_  
Register.

WATSON BRADLEY,  
COMPLAINANT

VS

MAZIE BRADLEY,  
RESPONDENT

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

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

Now comes your Complainant, Watson Bradley, and humbly complaining against the respondent, Mazie Bradley, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty one years of age, a resident of Baldwin County, Alabama, and has been for more than twelve months next preceding the filing of this bill of complaint; that the Respondent is over twenty one years of age and a non-resident of the State of Alabama, her address being Post Office Box 144, Pensacola, Florida.

2.

That they were married in Pensacola, Florida, on May 14th, 1940, and lived together as husband and wife until, to-wit, October 20th, 1940.

3.

That on, to-wit, October 20th, 1940, the Respondent voluntarily abandoned the bed and board of the Complainant and \_\_\_\_\_

has remained away voluntarily and continuously since that time.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said Mazie Bradley party respondent to this cause of action, requiring her 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.

Complainant further prays that your Honor will, upon the hearing hereof, enter an order giving and granting him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent, and that your Honor will give and grant unto him such other, further, different and general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

By *Huber*  
Solicitors for Complainant

1009

WATSON BRADLEY  
COMPLAINANT

VS

MAZIE BRADLEY  
RESPONDENT

SUMMONS AND COMPLAINT.

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