

1175

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

Your Orator, Joseph F. Armstrong, who is also known as Joseph Armstrong, presents this Bill of Complaint against Cora Lee Armstrong and thereupon your Orator complains and shows unto the Court and your Honor as follows:

1. Your Orator is over twenty-one years of age and is a bona fide resident citizen of Baldwin County, Alabama, whose present residence and post office address is Camp Swift, Texas, where he is stationed as a member of the armed forces of the United States of America. The Respondent, Cora Lee Armstrong, is a married woman over eighteen years of age, whose residence and post office address is Bay Minette, Alabama.

2. Your Orator and the said Respondent were lawfully married on, to-wit, March 31, 1941, and lived together as man and wife in Baldwin County, Alabama until on, to-wit, October 3, 1942, when they separated.

3. Immediately prior to the said separation, the said Respondent, Cora Lee Armstrong, committed adultery with Roosevelt Valree, after which your Orator separated from her and has not lived with her since the said date.

PRAYER FOR PROCESS

Your Orator prays that the Court will take jurisdiction of the cause made by this Bill of Complaint, that due notice thereof be given the Respondent, Cora Lee Armstrong, in the form and manner prescribed by law, requiring her to plead to, answer or demur to the Bill of Complaint within the time and under the pains and penalties prescribed by law and the practice of this honorable Court.

PRAYER FOR RELIEF

THE PREMISES CONSIDERED, your Orator prays that upon a final hearing of this cause, the Court will make and enter a proper order or decree dissolving the bonds of matrimony now existing

between your Orator and the said Respondent, granting to him the right to marry again. Your Orator further prays for such other, further and general relief as he may be equitably entitled to, the premises considered.

J. B. Blackburn

Solicitor for Orator.

1125-

BILL OF COMPLAINT

JOSEPH F. ARMSTRONG,

Complainant,

VS.

CORA LEE ARMSTRONG,

Respondent.

Long Beach, Ala.
or other quarters

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

Bay Minette
Orangeville
Valle
Filed Aug 9 1944
R. H. [unclear]

Rec. 5/28/45
F. K.

Executed this the
22nd day of May, 1945
By Sending Copy on
Cora Lee Armstrong

C. E. Garrett Sheriff
W. E. Taylor D. S.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. 1175

CIRCUIT COURT BALDWIN COUNTY

August. TERM, 1944

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Cora Lee Armstrong.

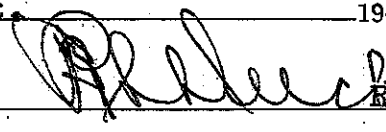
to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Cora Lee Armstrong. Respondent.

by Joseph F Armstrong.

Complainant

Witness my hand this 9th day of August, 1944


Registrar.