

506

To The Honorable John D Leigh, Judge of the 21st Judicial Circuit Court of Equity in and for Baldwin County, Alabama:

Comes now your orator, Thos. J. Blair, who is over twenty years of age and is a resident of Baldwin County, Alabama and exhibits this his Bill of Complaint against Leila Blair, who is, also, over twenty one years of age and is a resident of Pensacola in the State of Florida, respectfully showing as follows:

First that your orator and the said Leila Blair intermarried with each other at Loxley, Baldwin County, Alabama on to wit October 12th 1922 and lived together in said county and state as man and wife up to March 1st, 1925.

Second: That since the said marriage the respondent has become a leud and immoral woman and that without the consent or knowledge of your orator she has committed adultery with Tom Levins and with divers other whose names are unknown to your orator.

Wherefore, your orator prays that your Honor will decree that the bonds of matrimony between your orator and the said Leila Blair be dissolved and grant an absolute divorce to your orator and grant permission to your orator to remarry, and if your orator has not asked for the proper relief, then your Honor will grant to your orator such other and further relief as the premises will require and as to your Honor shall seem meet. And your orator further prays that your Honor will grant to your orator the writ of summons of the state of Alabama and such other necessary process of this Honorable court, directed to the said Leila Blair and commanding her to answer, plead or demur to the bill of complaint within the time required by law and to stand to and abide such orders and decrees as to your Honor shall seem meet.

And your orator will ever pray, etc.

S. Jenkins

Solicitor for Complainant.

Foot Note: The defendant is required to answer the allegations of the foregoing Bill of complaint from paragraphs 1 to 2 inclusive, but not under oath, oath to the answer being expressly waived.

S. Jenkins

Solicitor for Complainant.

1st

Filed June 2/1920
T. W. Richardson
Register

RECORDED

Thos. J. Blair,
Complainant)
vs
Leila Blair,
Respondent .

In the Circuit Court of Baldwin County,
Alabama. In Equity.

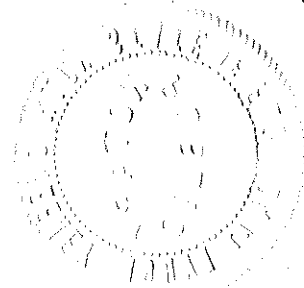
Comes the respondent and for answer to the complaint and each allegation thereoff denies the facts therein set forth and demands strict proof of the same .

Leila Blair
Respondent .

State of Florida,
Escambia County

Before me Ruth Sweeney a Notary Public in and for said state
and county, personally appeared ^{Now Leila Brooks,} Leila Blair, who is known to me and who
being first duly sworn ^{by me}, doth depose and say that she is the person named
as respondent in the cause of Thos J Blair vs Leila Blair now pending in
the Circuit Court of Baldwin County, Alabama and that she signed the
foregoing instrument of writing, as her answer to said cause of Bill of
complaint. Affiant further says that she is the wife in law, of said-
Thos. J. Blair, but now goes under the name of Leila Brooks.

Ruth Sweeney
Notary Public, Escambia County, Florida .



Filed June 24/920
T. W. Newman
Registrar

Thos . J. Blair, }
Complainant, }
vs
Leila Blair, }
Respondent .

In the Circuit Court of Baldwin County,
Alabama. In Equity.

The Respondent, Leila Blair, in the above styled cause hereby waives notice of the time and place of taking evidence in the foregoing cause and the right to cross examine the witnesses, and the notice of application for final hearing and consents that testimony be opened and the hearing be had without further notice .

Leila Blair

Respondent .

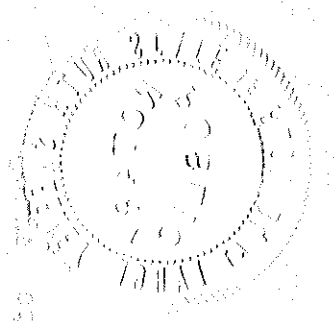
State of Florida,
Escambia County,

Before me Ruth Sweeney a Notary ~~public~~ in and for said state and county, personally appeared Leila Blair, now known as Leila Brocks, who is known to me as acknowledged before me on this day that she signed the foregoing instrument in writing and that she is the person named as defendant in the cause of Thos. J. Blair vs Leila Blair and that she is the respondent in said cause, now pending in the Circuit - Court of Baldwin County, Alabama, In Equity

Ruth Sweeney

Notary Public, Escambia County, Florida .

2nd
all



Filed June 24/92 -
T. W. Whelan
Register

RECORDED

[Handwritten signature]

REGISTERED

STATE OF ILLINOIS
DEPARTMENT OF PUBLIC SAFETY
CHICAGO, ILL.

RECEIVED
JUN 24 1892

The State of Alabama }
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Leila Blair, 710 West Intendencia,
St Pensacola, Fla,

of Pensacola, ~~county~~ to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Thos. J. Blair,


against said

Leila Blair,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 9th day of June,

192 5.


Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Serve on.....

Circuit Court of Baldwin County
In Equity

No.

SUMMONS

Thos. J. Blair,

vs.

Leila Blair,

S. C. Jenkins,

Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this.....

day of 192.....

Sheriff.

Executed this..... day of

..... 192.....

by leaving a copy of the within summons with

Defendant.

Sheriff.

By.....
Deputy Sheriff.

*Copy of Summons &
Copy of Complainant
Bill by Reg mail to
Deft June 9th 1925 -
T. W. McIlwain*

*June 16th 1925 - Clerk.
Copy of Summons & Copy
of Bill sent by Reg mail
to Exy Barrancas & Co*

State of Alabama)

Baldwin county)

Before me John G. Saxe, Notary Public

personally appeared Thos. J. Blair, who being by me first
duly sworn, says on oath that he is the complainant in the cause
Thos. J. Blair vs Leila Blair No. and that he is informed and
believes and from such information and belief states that Leila
Blair is over the age of twenty one years and is a nonresident of
the state of Alabama, residing in the City of Pensacola and state
of Florida, when last heard from.

Thos J Blair

Subscribed and sworn to before me this 8th day of June, 1925



John G Saxe
Notary Public
Baldwin Co Ala

Thos J Blair

CIRCUIT COURT OF

Lila Blair vs.

.....COUNTY.

IN EQUITY.

I, *T W Riemann*, Register of said Court, do hereby certify that I

did, on the *16* day of *June* 192*5*, send to

Lila Blair Defendant.

whose address was *Burwood Glen*

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill

of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the *19th* day of *June* 192*5*.

Witness my hand, this *19* day of *June* 192*5*

T W Riemann
Register.

No.....

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

Thos J Blair

vs.

Lila Blair

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this.....

19th

day of

June

192*5*

T. W. Resner

Register.