

STATE OF ALABAMA,
BALDWIN COUNTY.



IN THE CIRCUIT COURT,
IN EQUITY.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT
COURT, BALDWIN COUNTY, ALABAMA, - - - - - IN EQUITY.

Your Oratrix, Lula V. Roberts, respectfully represents
and shows unto Your Honor as follows:-

FIRST:-

That she is a bona fide resident citizen of Baldwin
County, Alabama, residing at Hurricane, in said County and State; that she
is over the age of twenty one years.

That W. J. Roberts is over the age of twenty one years and
a resident citizen of the State of Alabama, residing at Hurricane; that both,
your Oratrix and the said W. J. Roberts have resided in Baldwin County,
Alabama, for a period of more than the last three years immediately pre-
ceding the filing of this bill.

SECOND:-

That Your Oratrix and the said W. J. Roberts were lawfully
married on or about April 15th., 1924, and lived together as husband and
wife until to-wit:- the latter part of October, 1924, at which time the said
W. J. Roberts voluntarily abandoned your oratrix and her ten year old child.

THIRD:-

That on or about to-wit:- the latter part of October, 1924,
the said W. J. Roberts deserted your petitioner and her minor child stating
that he was going back to his voting place to vote and at the time of leaving
he left but very little food in the house to provide for your petitioner and
said child; that he made no provision to care for them and at no time since
this date has he provided or cared for your Oratrix and her minor child, but

on the other hand states that he does not intend to care for and support Your Oratrix and her minor child and refuses to return and live with her or to allow Your Oratrix to live with him and that Your Oratrix, on numerous occasions has asked and begged the said W. J. Roberts to return and live with her and also on numerous occasions has asked and begged the said W. J. Roberts to take her with him ^{which he refuses to do} and the said W. J. Roberts constantly made promises that he would provide and care for oratrix but without ever fulfilling same and Your Oratrix alleges that she is in destitute circumstances without any means of support or income whatever; that she is without food and necessary clothing, being forced to borrow provisions from her family in order to exist until her rights can be determined by this Honorable Court; that Your Oratrix has been and is now willing to live with the said W. J. Roberts.

FOURTH:-

That Your Oratrix is informed and believes and upon such information and belief alleges the truth to be that the said W. J. Roberts is the owner of valuable property located in Baldwin County, Alabama, consisting of a large farm and other personal property in connection therewith and in addition to this the said W. J. Roberts draws from the Federal Government approximately \$70.00 per month and an annual rental of \$500.00 per year from his farm.

That Your Oratrix is the owner of no property whatever and no means of support and has a minor child to care for and support.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED Your Oratrix respectfully prays that the said W. J. Roberts be made party respondent to this bill of complaint by the usual process of this Honorable Court and that he be required to demur, plead to or answer the said bill of complaint under the pains and penalties of this Honorable Court and within the time required by law or that the same be forever confessed.

on the other hand states that he does not intend to care for and support Your Oratrix and her minor child and refuses to return and live with her or to allow Your Oratrix to live with him and that Your Oratrix, on numerous occasions has asked and begged the said W. J. Roberts to return and live with her and also on numerous occasions has asked and begged the said W. J. Roberts to take her with him ^{which he refuses to do} and the said W. J. Roberts constantly made promises that he would provide and care for oratrix but without every fulfilling same and Your Oratrix alleges that she is in destitute circumstances without any means of support or income whatever; that she is without food and necessary clothing, being forced to borrow provisions from her family in order to exist until her rights can be determined by this Honorable Court; that Your Oratrix has been and is now willing to live with the said W. J. Roberts.

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THE PREMISES CONSIDERED Your Oratrix respectfully prays that the said W. J. Roberts be made party respondent to this bill of complaint by the usual process of this Honorable Court and that he be required to demur, plead to or answer the said bill of complaint under the pains and penalties of this Honorable Court and within the time required by law or that the same be forever confessed.

PRAYER FOR RELIEF.

That Your Honor will order a reference and cause the Register of this Honorable Court to determine a reasonable amount of alimony pendente lite and a reasonable attorney's fees and upon the final hearing of this cause, that Your Honor will grant unto Your Oratrix a sufficient amount of alimony to care for and provide for Your Oratrix and her minor child suitable to the condition and station in life occupied by the said W. J. Roberts and Your Oratrix and that Your Honor will issue any and all orders and decrees necessary to determine the rights of the parties to this bill of complaint and will enter a final decree in accordance therewith.

That if Your Oratrix is mistaken in the relief prayed for above then Your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled to receive, she will ever pray, etc., . . .

HAMILTON & MOORE,
Solicitors for Complainant.

FOOTNOTE:-

The respondent, W. J. Roberts is required to answer each and every allegation of the foregoing bill of complaint, from First to Fourth, both inclusive, but not under oath, answer under oath being hereby expressly waived.

HAMILTON & MOORE,
Solicitors for Complainant.

Original Bill

Filed June 8th 1925
T. W. Peterson
Register

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT,
IN EQUITY.

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PRAYER FOR RELIEF.

That Your Honor will order a reference and cause the Register of this Honorable Court to determine a reasonable amount of alimony pendente lite and a reasonable attorney's fees and upon the final hearing of this cause that Your Honor will grant unto Your Oratrix a sufficient amount of alimony to care for and provide for Your Oratrix and her minor child suitable to the condition and station in life occupied by the said W. J. Roberts and Your Oratrix and that Your Honor will issue any and all orders and decrees necessary to determine the rights of the parties to this bill of complaint and will enter a final decree in accordance therewith.

That if Your Oratrix is mistaken in the relief prayed for above then Your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled to receive, she will ever pray, etc., . . .

HAMILTON & MOORER,
Solicitors for Complainant.

FOOTNOTE:-

The respondent, W. J. Roberts is required to answer each and every allegation of the foregoing bill of complaint, from First to Fourth, both inclusive, but not under oath, answer under oath being hereby expressly waived.

HAMILTON & MOORER,
Solicitors for Complainant.

• [Faint, illegible text]

received the same has received a return like yours and will
showing yours to answer [illegible] of [illegible] [illegible]

• [Faint, illegible text]

specimens to insure [illegible] and [illegible] [illegible] [illegible]

one of [illegible] [illegible] and [illegible] [illegible] [illegible]

that has [illegible] [illegible] [illegible] [illegible] [illegible]

specimens returned and [illegible] [illegible] [illegible] [illegible]

the [illegible] [illegible] [illegible] [illegible] [illegible]

not [illegible] [illegible] [illegible] [illegible] [illegible]

has [illegible] [illegible] [illegible] [illegible] [illegible]

the [illegible] [illegible] [illegible] [illegible] [illegible]

• [Faint, illegible text]

the [illegible] [illegible] [illegible] [illegible] [illegible]

• [Faint, illegible text]

the [illegible] [illegible] [illegible] [illegible] [illegible]

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the [illegible] [illegible] [illegible] [illegible] [illegible]

• [Faint, illegible text]

1st

Original Bill

Filed June 19th 1925
T. H. Dickinson
Register

RECORDED

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 W. J. Roberts,

of Baldwin 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

Lula V. Roberts,

against said

W. J. Roberts,

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 19th day of June,

1925.

T. W. Richerson
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. 508

SUMMONS

Lula V. Roberts,

vs.

W. J. Roberts,

Hurricane, Ala.

Hamilten & Moorer.

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this 19th

day of June, 1925

W. R. Stuart
Sheriff.

Executed this 29th day of

June, 1925

by leaving a copy of the within summons with

W. J. Roberts
Defendant.

W. R. Stuart
Sheriff.

By _____
Deputy Sheriff.