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HERMAN SEITZ,)
Complainant,)
-vs-)
ADELE SEITZ,)
Defendant.)
----- X

IN THE CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA.
BALDWIN COUNTY.

TO THE HON. THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
AND THE HON. JOHN D. LEIGH, JUDGE THEREOF SITTING IN EQUITY:-

Comes your Complainant Herman Seitz and exhibits this, his bill of Complaint against Adele Seitz and for grounds thereof shows unto Your Honor and unto this Court as follows:-

(1). That both your complainant and the defendant are over the age of 21 years; that your complainant is a bona fide resident of Baldwin County, Alabama and has been such for more than three years next immediately preceding the filing of this bill of complaint.

(2). That defendant is a non-resident of the State of Alabama and when last heard from resided at Pharr, La. which is her post office address.

(3) That your complainant and the defendant were married heretofore on to-wit:- December 13th., 1921 and they lived to-gether as man and wife until to-wit; during the month of May, 1923.

(4). That on to-wit: during the month of May, 1923, the defendant, without just cause ~~or~~ legal excuse voluntarily left and abandoned your complainant; that such desertion and abandonment occurred more than two years before the filing of this bill of complaint and has continued since that time.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, the complainant prays that all necessary notices and subpoenas issue necessary to make the said Adele Seitz party respondent to this bill of complaint requiring her to appear and plead, answer or demur, within the time required by law under the paines and penalties of this court. That upon a final hearing of this cause that Your Honor will render, adjudge and decree that the bonds of matrimony between your complainant Herman Seitz and the defendant Adele Seitz be forever dissolved and that your complainant

(page two)

be again permitted to contract the marriage relation should he so desire and as in duty bound, your complainant will ever pray , etc.

STONE & STONE,
Solicitors for complainant.

FOOT NOTE:-

The defendant is required to answer each and every paragraph of the foregoing bill of complaint from "1st. to 4th.", both inclusive, but answer under oath is hereby expressly waived.

STONE & STONE,
Solicitors for Complainant.

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 Adele Seitz,

of Pharr La, ~~Seitz~~, 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

Herman Seitz,

against said

Adele Seitz,

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 20th day of August

1925.



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

vs.

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.

RECORDED

By _____
Deputy Sheriff.

Aug 21 1925
Copy of Bill and
Copy of Summons
sent by Reg mail.
Addressed to Ethel Seitz
Thorn La. marked "Deliver
to Adeline Seitz, & return
receipt demanded.

T. W. Reel
Clerk

2
Sutz

vs

Sutz

Affidavit of
non residence

Filed 8/20/20

T.W. Rice
Register

RECORDED

Herman Seitz

No. 523

vs.

Adelle Seitz

CIRCUIT COURT OF

..... COUNTY.

IN EQUITY.

I, *J.W. Ricerson*

Register of said Court, do hereby certify that I

did, on the *21st* day of *Aug* 192*5*, send to

Adelle Seitz

Defendant

whose address was *Pharro La.*

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 *25* day of *Aug* 192*5*

Witness my hand, this *25th* day of *Aug* 192*5*

J.W. Ricerson

Register.

No. 623

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

Herman Seitz

vs.

Ada Seitz

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 25th

day of Aug 1925

D. W. Beaman

Register.

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE \$ 300

REGISTERED PARCEL

POSTOFFICE OF DELIVERY
OFFICE
DATE OF DELIVERY

No. _____
INSURED PARCEL

No. _____
Return to *J. W. Richardson*
(NAME OF SENDER)

Street and Number
of Post Office Box _____
Post Office at _____

City _____
State _____

Form 100

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original of which appears on the face of this Card.

Signature of Recipient (Required)

Signature of Postmaster's Agent (Required)

Date of Delivery *1/2*

*Special Agent in Charge
New York*

U.S. POST OFFICE

POSTAGE WILL BE PAID BY ADDRESSEE

10-100