
ISABELLA TEMPELMEN,
Complainant,

-vs-

AUGUST TEMPELMEN,
Defendant.

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

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

Comes your complainant, Isabella Tempelman and exhibits this
her Bill of Complaint for divorce against August Tempelman and for
grounds thereof, shows unto this court and unto your Honor, as fol-
lows:-

1. That both your complainant and the defendant are over the
age of 21 years and are bona fide residents of Perdido Beach, Baldwin
County, Alabama and have made it their home for the past 15 years or
more continuously.
2. That your complainant and the defendant were married on
heretofore to-wit:- May 29th., 1910 and lived to-gether as man and
wife up until this time.
3. That since said marriage and during the last two years the
defendant has become and is now addicted to habitual drunkenness; that
he has committed actual violence on the person of your complainant
attended with danger to life or health; that his conduct has been and
is now such that your complainant has reason to apprehend commission
of actual violence on her person attended with danger on life or heal-
th; that he has threatened to do her bodily harm, drew a gun on her
and has otherwise committed actual violence on and made threats
against your complainant.
4. That your complainant is 45 years of age, is not versed
in business or means of earning a livelihood and is unable to support
and properly care for herself and the 14 year old child by said marr-
iage; that defendant owns real and personal property located in the

neighborhood of Perdido Beach and Elberta ^{that} not reasonably worth less than \$2,000.00; that he is a carpenter by trade and is able to and does earn a good livelihood but has failed and refused to support or contribute to the support of your complainant and their said child in a manner suitable to their condition and station in life; that the defendant for the last two years ^{from this date} has ~~has~~ left complainant and their said child, going to Florida where he worked at his trade and has refused to contribute to their support except to the extent of about \$250.00 covering the period of about two years.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, complainant prays that such orders and decrees, notices and subpoenas be issued or caused to be issued in this matter necessary to make the said August Tempelman party defendant, requiring him to appear and plead, answer ~~and answer~~ within the time required by law under the pains and penalties of this court; that your Honor will order and have held a reference to ascertain a suitable amount to be paid to complainant as attorneys fees for the prosecution of this cause, for alimony during the pendency thereof and as permanent alimony to be paid by defendant.

PRAYER FOR RELIEF.

That upon the holding of such reference in accordance with the rules of this court that there be decreed to your complainant a proper amount to be paid her by defendant for such counsel fees and alimony pendente lite; that upon a final hearing of this cause your Honor will render, adjudge and decree ~~ta~~ that the bonds of matrimony heretofore existing between your complainant and the defendant be forever dissolved, permitting your complainant to again contract the marriage relation should she so desire and that your Honor will decree an amount to be paid, in such form, manner and upon such terms as may seem proper, by the defendant to complainant as permanent alimony, and as in duty bound, your complainant will ever pray, etc. etc.

STONE & STONE,
Solicitors for complainant.

(page three)

FOOT NOTE:-

The defendant is required to answer each and every paragraph of the foregoing bill of complaint; from one to four both inclusive, but answer under oath is hereby expressly waived.

STONE & STONE,
Solicitors for Complainant.

*Order
by
court*

----- X
 ISABELLA TEMPELMEN,)
 Complainant,)
 -vs-)
 AUGUST TEMPELMEN,)
 Defendant.)
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 and has otherwise committed actual violence on and made threats
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4. That your complainant is 43 years of age, is not versed
 in business or means of earning a livelihood and is unable to support
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neighborhood of Perdido Beach and Elberta ~~not~~ ^{not} reasonably worth, less than \$2,000.00; that he is a carpenter by trade and is able to and does earn a good livelihood but has failed and refused to support or contribute to the support of your complainant and their said child in a manner suitable to their condition and station in life; that the defendant ^{from time to time} for the last two years has ~~has~~ left complainant and their said child, going to Florida where he worked at his trade and has refused to contribute to their support except to the extent of about \$250.00 covering the period of about two years.

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Solicitors for complainant.

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STONE & STONE,
Solicitors for Complainant.