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State of Alabama, -aldwin County.

In the Circuit Court. Baldwin County, Alabama In Rouity.

To the Lonorable John D. Leigh, Judge of the Circuit Court, In Equity. Baldwin County, Alabama.

Your Oratrix Ada Mattingly, respectfully represents and shows unto Your Honor as follows:

FIRST.
That she is akmasama bona fide resident citizen of belawin County, Alabama, residing at Robertsdale Alabama, that she is over the age of twenty-one years and has resided in Baldwin County, Alabama, for more than three years next immediately preceding the filing of this bill.

SECOND.

That Chestar Mattingly is now residing at Little River, Florida, Post Office Box 783; that he is over the age of twenty-one years.

THIRD. That Your Oratrix and the said Chester Mattingly were married about eleven years ago and lived together as man am wife up until to wit: - September 15th, 1925; that on and prior to this time the said ehtsre mattingly had often abused and beat Your Oratrix and that said acts were committed in Baldwin County, Alabamma; that from the conduct of the said Chester Mattingly Your Cratrix had reasonable apprehension of such violence as to endanger her life and health.

There was born to Your Oratrix and the said Chester Mattingly, age ten years; Woodrow Mattingly, age seven years; Edith Mattingly, age 4 years; Yu Vonne Mattingly, age three years; that Your Oratrix desires the custody anaccontraca of the said minor children; that she is a suitable and proper person to care for them.

Your Oratrix is informed and believes that the said Chester Mattingly is making considerable money in Florida and that he has failed and refused to provide means and support for Your Oratrix and her minor childrem; that in addition to this he has forty acres of land in Ba ddwin County, Alabama, worth considerable money.

PRAYER FOR PROCESS. THE PREMISES CONSIDERED, Your Orastrix respectfully prays that the said Chester Mattingly be made party respondent to this bill of complaint by the usual process of this Monorable Court and that he be required to plead to or answer the said bill of complaint under the pains and penalties of this Bonotable Court and within the time required by law or that the said 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 ethorage & section amount of alimony pendente lite and a reasonable attorneys fee and upon the final hearing of this cause, that Your Honor will grant unto Your Opatrix a sufficient amount of alimony to care for and provide for Your Oratrix and her minor children suitable to the condition and station in life occupied by the said Chester Mattingly and Your Cratrix 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, and grant unto Your Oratrix and absolute divorce .

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

Hamilton and Moorer , Solicitors for Complaint.

FOOTNOTE: The respondent Chester Mattingly, is required to answer each and every Altegration of the foregoing bill of complaint, from First to Third, inclusive, but not under eath, answer under eath is hereby expressly waived.

Hamilton & Moorer, solicitors for complainant.

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## The State of Alabama, Baldwin County.

CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

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To any Sheriff of the State of Alabam			
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of Little River Fla	to be and appea	ar before the Judge of the	Circuit Cour
of Baldwin County, exercising Chancery	jurisdiction, within	a thirty days after the se	rvice of Sum
mons, and there to answer, plead or demu	ir, without oath, to	a Bill of Complaint lately	exhibited by
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and further to do and perform what said Ju	dge shall order an	d direct in that behalf. A	nd 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 im:	mediately upon the execut	ion thereof.
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WITNESS, T. W. Richerson, Registe	er of said Circuit C	Court, this6th	ay of
November 192.5.	•		
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# The State of Alabama, CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:
WE COMMAND YOU, That you summon Chester Mattingly
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of Little River Fla Comments to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
Ada Mattingly
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against said
Chester Mattingly.
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, this6th day o
MILITIADO, A. H. MICHAELLE, TIB
November 1925.
Mallelunion Register
N. B Any party defendant is entitled to a copy of the bill upon application to the Register.

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STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT,

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Your Oratrix, Ada Mattingly, respectfully represents and shows unto Your Honor as follows:-

#### FIRST: Day the operation to be the Police of

That she is a bona fide resident citizen of Baldwin County, Alabama, residing at Robertsdale, Alabama, that she is over the age of twenty one years and has resided in Baldwin County, Alabama, for more than three years next immediately preceding the filing of this bill.

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That Chester Mattingly is now residing at Little River, Florida, Post Office Box 785; that he is over the age of twenty one years.

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were married about eleven years ago and lived together as man and on and wife up until to-wit:- September 15th., 1925; that prior to this time the said Chester Mattingly had often abused and beat Your Oratrix and that said acts were committed in Baldwin County, Alabama; that from the conduct of the said Chester Mattingly Your Oratrix had reasonable apprehension of such violence as to endanger her life and health.

There was born to Your Oratrix and the said Chester

Mattingly the following named children: Rena Mattingly, age ten years;

Woodrow Mattingly, age seven years; Edith Mattingly, age 4 years;

Yu Vonne Mattingly, age three years; that Your Oratrix desires the

custody of the said minor children; that she is a suitable and proper

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# The State of Alabama BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

Baldwin County, to  County, exercising Chancery jurisdiction, within the  ad or demur, without oath, to a Bill of Complaint I  Ada Hatti  Chester	nely
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	er and direct in that behalf. And this the said Defendan
no wise omit, under penalty, etc. And we further com	nand that you return this writ with your endorsement th
our said Court immediately upon the execution the	reof.
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WITNESS, T. W. Richerson, Register of said Circa	,
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Cotober 1927.	it Court, this 7 th day of
L	it Court, this
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person to care for them.

Your Oratrix is informed and believes that the said Chester Mattingly is making considerable money in Florida and that he has failed and refused to provide means and support for your Oratrix and the her minor children; that in addition to this he has forty acres of land in Baldwin County, Alabama, worth considerable money.

#### PRAYER FOR PROCESS.

THE PREMISES CONSIDERED Your Oratrix respectfully prays that the said Chester Mattingly be made party respondent to this bill of complaint by the usual process of this Honorable Court and that he be required to 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 said 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 fee 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 children suitable to the condition and station in life occupied by the said Chester Mattingly 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, and grant unto Your Oratrix an absolute divorce.

That if Your Oratrix is mistaken in the relief prayed for above then Your Honor will grant unto her such other, further, differenet 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:-

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The respondent, Chester Mattingly, is required to answer each and every allegation of the foregoing bill of complaint, from First to Third, inclusive, but not under oath, answer under oath is hereby expressly waived. HAMILTON & MOORER,

Solicitors for Complainant.

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## The State of Alabama } BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

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### Circuit Court of Baldwin County In Equity

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Rickarby, Boebe & Hall.

Solicitor for Complainant.

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### THE STATE OF ALABAMA BALDWIN COUNTY

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THE STATE OF ALABAMA, BALDWIN COUNTY. Circuit Court of Baldwin County In Equity. Received in office this\_ SUMMONS Sheriff. Executed this\_\_\_ by leaving a copy of the within Summons with Defendant. By Bowiggine
Deputy Sheriff Solicitor for Complainant