

State of Alabama,  
Baldwin County.

540  
In the Circuit Court,  
Baldwin County, Alabama  
In Equity.

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

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

FIRST.

That she is ~~a bona fide~~ 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.

SECOND.

That Chester 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 and  
wife up until to wit: - September 15th, 1925; that on and  
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, 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 and ~~control~~ 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 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 ~~attorneys fee~~  
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 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 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 ~~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.

Copy

Find Nov 5th 1921-  
J. McElwain  
Register

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 Chester Mattingly

of Little River Fla ~~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 Sum-  
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Ada Mattingly

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, this 6th day of

November 1925.

T. W. Richerson Register.

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

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 Chester Mattingly

of Little River Fla ~~Case~~ 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

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, this 6th day of

November, 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. ....

SUMMONS

Ada Mattingly

vs.

Chas. Mattingly.

Hamilton & Mooror.

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 Bill &  
Copy of Summons  
sent by Reg mail  
to Dept at Little  
River Ala  
Nov 21 1921  
J. M. McQuinn Reg-

STATE OF ALABAMA,  
BALDWIN COUNTY.

IN THE CIRCUIT COURT,  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT,  
BALDWIN COUNTY, ALABAMA, . . . . . In Equity.

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

FIRST:

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 preceeding the filing of  
this bill.

SECOND:

That Chester 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 and  
wife up until to-wit:- September 15th., 1925; that <sup>on and</sup> 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

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 Chester Mattingly,

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

Ada Mattingly


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, this 7th day of

October 1927.

  
Register.

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

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, 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, 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.

*Original*

Serve on

Circuit Court of Baldwin County  
In Equity

No. *540*

SUMMONS

Ada Mattingly,

vs.

Thester Mattingly.

*Robert Lee*

*Ala.*

Rickaby, Beebe & Hall.

*10-20-21 out of Co*

Solicitor for Complainant.

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 *Robert Lee* Deputy Sheriff.

*not found in Baldwin Co Ala this 20th day Oct 1921*

*to return  
By Robert Lee*

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 Chester Mattingly,

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

Ada Mattingly

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, this 7th day of

October

7.

192

*T. W. Richerson*  
Register.

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

*Cover*

Serve on \_\_\_\_\_

Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

Ada Mattingly,

vs.

Chester Mattingly.

*Robert Lee*  
*Albee*

Rickarby, Beebe & Hall.

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.

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 Chester Mattingly

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

Ada Mattingly

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, this 7th day of

October 1927.

Register.

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

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 28th day of Oct 1927

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By B. D. Wiggins Deputy Sheriff.