

(551)

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

The bill of complaint of EDWARD H. TITUS respectfully shows unto Your Honor as follows:

FIRST

The complainant is a resident of the County of Baldwin, State of Alabama, and has so permanently resided therein for upwards of three years next preceding the filing of this bill, and he has been such resident since the year 1916.

SECOND

Complainant and HATTIE TELLER TITUS were married, each to the other, about the year 1909, and have lived and resided together as man and wife in said County of Baldwin, State of Alabama. The said Hattie Teller Titus is upwards of twenty-one years of age and now resides in the City of Princeton, State of Illinois.

THIRD

Complainant shows unto Your Honor that the said Hattie Teller Titus voluntarily abandoned his bed and board more than two years next preceding the filing of this bill and for more than that period of time has had her a permanent residence in said City of Princeton, State of Illinois.

FOURTH

Complainant shows unto Your Honor that no children were born unto said complainant and respondent as the result of said marriage.

PRAYER

The premises considered, your complainant respectfully prays that notice may be given to said respondent Hattie Teller Titus by publication, as required by law and

the rules of this Honorable Court, requiring her to appear in this cause and to plead, answer or demur to this bill of complaint within a time to be fixed by this Honorable Court, or by rules and statutes governing such cause.

And your complainant further prays that upon a hearing of this cause your Honor will be pleased to enter a decree granting him an absolute divorce from the said Hattie Teller Titus and dissolving the bonds of matrimony existing between them.

And your complainant further prays for all such other and further or different relief as to Your Honor may seem suitable under the circumstances of the case,

And, as in duty bound, will ever pray, etc.

Gaillard Mahorn Starnes
Solicitors for Complainant

FOOT-NOTE: Respondent is required to answer each paragraph contained in the foregoing bill of complaint, but answer under oath is expressly waived.

Gaillard Mahorn Starnes
Solicitors for Complainant

STATE OF ALABAMA ()
COUNTY OF MOBILE ()

Before me, Ethel L. Dougherty, a Notary Public in and for said State and County, personally appeared Edward H. Titus, who, being by me first duly sworn, says that the allegations contained in the foregoing bill of complaint are true.

E. H. Titus

Subscribed and sworn to before me this 22nd day of Dec., 1925.

Ethel L. Dougherty
Notary Public, Mobile Co., Ala.

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 Hattie Teller Titus,

of Princeton Ill ~~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

Edward H. Titus,

against said

Hattie Teller Titus,

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 25th day of December

1925.

T. W. Richerson
Register.

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

Original 2

Serve on _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Edwin A. Titus

vs.

Heidi P. Titus

Garland Malcolm Throold
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

Sheriff.

By _____
Deputy Sheriff.

*Dec 23rd 1925 -
Copy of Complaint
v Copy of Summons
sent by Reg Mail to
Dept At Princeton
Missis*

*J. M. Williams
Register*

THIS DOCUMENT CONTAINS NEITHER RECOMMENDATIONS NOR
CONCLUSIONS OF THE NATIONAL ARCHIVES. IT IS THE PROPERTY OF THE
NATIONAL ARCHIVES AND IS LOANED TO YOUR AGENCY; IT AND ITS
CONTENTS ARE NOT TO BE DISTRIBUTED OUTSIDE YOUR AGENCY.

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

Edward M. Titus
No. 551.
vs.
Bettie Keller Titus,

The State of Alabama,

Baldwin County.

Circuit Court, in Equity.

This the 7th day of
January, 1926

In this cause it being made to appear to the Clerk of this Court by the affidavit of

Edward M. Titus,

that the Defendant Bettie Keller Titus,

is a non-resident of the State of Alabama and resides at Princeton, Ill.

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Bettie Keller Titus,

to answer or demur to the Bill of Complaint in this cause by the 6th day of February 1926 or after thirty days therefrom a decree Pro Confesso may be taken against her.

Glenn D. Malcom
& Associates
Attorneys for Plaintiff

Register.

LAW OFFICES OF
GAILLARD, MAHORNER & ARNOLD
66 ST. FRANCIS STREET
MOBILE, ALABAMA

S. PALMER GAILLARD
MATTHIAS MAHORNER
VIRGINIUS L. ARNOLD
S. PALMER GAILLARD, JR.

January 16, 1926.

Mr. T. H. Richardson,
Clerk Circuit Court,
Bay Minette, Alabama.

Dear Sir:

In the matter of divorce proceedings of
Titus vs. Titus a reconciliation has been brought about
and we are instructed to dismiss the bill filed by us
for Mr. E. H. Titus. Please therefore stop the advertising
and have the bill dismissed at the first opportunity and
at once send a bill for court costs, including the
advertising thus far accrued to Mr. E. H. Titus, Fair-
hope, Alabama.

Very truly yours,

Gaillard, Mahorner & Arnold

T. W. RICHESON
REGISTER AND CLERK OF THE CIRCUIT COURT
BALDWIN COUNTY
BAY MINETTE, ALA.

February 9th, 1926.

I hereby authorize the case of Edward H. Titus vs Hattie Teller
Titus dismissed from the Chancery Court of Baldwin Co, Ala.

E. H. Titus
Complainant.

Edward H. Titus.

CIRCUIT COURT OF

vs.

Hattie Teller Titus.

Baldwin COUNTY.

IN EQUITY.

I, T.W. Richerson, Register of said Court, do hereby certify that I

did, on the 23rd day of December, 1925, send to

Hattie Teller Titus, Defendant.

whose address was Princeton, Ill,

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill

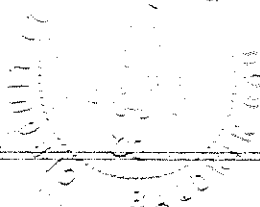
of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the 4th day of January, 1926

Witness my hand, this 4th day of January, 1926

T.W. Richerson

Register.



RECORDED

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No. 551.

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

Edward H. Titus,

vs.

Hattie Teller Titus,

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 4th,
day of January, 1926

[Signature]

Register.

RECORDED
RECORDED
RECORDED