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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  
of BALDWIN COUNTY, ALABAMA, . . . . . IN EQUITY.

Your orator, Gloster Ladd, respectfully represents  
and shows unto Your Honor as follows:-

FIRST:

That he is a bona fide resident of Baldwin County,  
Alabama, and is over the age of twenty-one years; that he has resided  
in Baldwin County, for more than three years next preceeding the filing of  
this bill.

That Mary Ladd is a resident of Baldwin County, Alabama,  
and is over twenty one years of age.

That your Orator, Gloster Ladd, is residing at  
Tensaw, Alabama.

That the said Mary Ladd is residing at Mobile, Alabama,  
259 Cedar Str.,

SECOND:

That Your Orator and the said Mary Ladd were lawfully  
married in the year 1916; that they resided together as husband and  
wife until, to-wit:- September, 1920, when defendant voluntarily abandoned  
complainant without just cause or excuse and without fault on his part;  
That at the time of said abandonment said defendant and complainant  
were residing in Baldwin County, Alabama; that they have not lived together  
since abandonment.

THE PREMISES CONSIDERED complainant prays this Honorable  
Court will take jurisdiction of the cause made by this bill of complaint and  
by appropriate process be required to plead, answer and demur to this

bill of complaint under the usual penalties and within the time required by law; that upon the final hearing of this cause, complainant be granted an absolute divorce by this Honorable Court, from the said Mary Ladd and that such other further and different orders and decrees be made and entered as in the premises shall be meet.

Henry D. Moore  
Attorney for Complainant.

FOOT NOTE:-

Defendant is required to answer every allegation in the foregoing bill, paragraph one to two inclusive, but not under oath, Answer under oath is hereby expressly waived.

Henry D. Moore  
Attorney for Complainant.