

619

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 Ruby F. Powell,

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

Shirley Powell,

against said Ruby Powell,

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 16th day of

April 1926

T. W. Richerson Register.

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

Original

SERVE ON _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

Shirley Powell.

vs.

Ruby Powell,

Henry D. Moorer.

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 _____
Deputy Sheriff.

Recorded in Vol. _____ Page _____

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 Ruby F. Powell,

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

Shirley Powell,

against said Ruby Powell,

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 16th day of

April 192 6

T. W. Richerson Register.

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

Copy

SERVE ON _____
**Circuit Court of Baldwin County
In Equity.**

No. _____

SUMMONS

Shirley Powell,

vs.

Ruby Powell,

Henry D. Moorer,

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 _____
Deputy Sheriff.

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 Orator, Shirley Powell, respectfully represents and shows
unto Your Honor as follows:-

FIRST:

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

SECOND:

That Ruby F. Powell is a resident citizen of Baldwin County,
Alabama, residing at Bay Minette, Alabama; that she has resided in Baldwin
County, Alabama, for more than three years next preceeding the filing of this
bill; that she is over the age of twenty one years.

THIRD:

That Your Orator and the said Ruby F. Powell were lawfully
married on the 22nd., day of July, 1926, and lived together
as husband and wife until, to-wit:- August 6th., 1926, at which time the said
Ruby F. Powell committed the act of adultery with one Willard Powell; that
your orator did not connive or condone said offense; said act was committed
in Baldwin County, Alabama.

THE PREMISES CONSIDERED Your Orator respectfully prays that
the said Ruby F. Powell be made party respondent to this bill of complaint by
the usual process of this Honorable Court; that such orders, decrees and
publications be made as necessary to perfect service on the said Ruby F. Powell.

and that she be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your Honor will grant unto Your Orator an absolute divorce from the said Ruby F. Powell.

That if Your Orator is mistaken in the relief prayed for then Your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.,

HENRY D. MOORER,
Attorney for Complainant.

FOOTNOTE:

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

HENRY D. MOORER,
Attorney for Complainant.