

1307

STATE OF ALABAMA
BALDWIN COUNTY

WE COMMAND YOU that you summon MARY BRILL, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction, within thirty days after the service of summons, and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by Thomas F. Brill, against the said Mary Brill, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court, this the 28 day of March, 1945.

R. S. Duck

THOMAS F. BRILL)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
VS.)	
MARY BRILL)	IN EQUITY
RESPONDENT)	

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now comes your Complainant, Thomas F. Brill, and humbly complaining against the Respondent, Mary Brill, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, and have been for more than three years next preceding the filing of this bill of complaint; that they are both over twenty-one years of age; that the Complainant and the Respondent are husband and wife, having married at Pensacola, Florida, on December 24th, 1925;

2.

That on to-wit, in July, 1943, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said Mary Brill party Respondent to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing hereof, your Honor will enter an order and decree, granting to the Complainant an absolute decree of dicorce, forever barring the bonds of matrimony existing between him and the Respondent; that your Honor will give and grant to him such other, further, different, or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound, he will ever pray.

BEEBE & HALL

By: *Hubert*
Solicitors for the Complainant

1307

Rec in office
2/28/45 F.K.

THOMAS F. BRILL
VS
MARY BRILL

do J.W. Pinner
East of City Range
East of 7. or by

SUMMONS AND COMPLAINT

546/88 March 28/1945
J. Pinner
Audyt. Lewis
at Rainton

Executed 4/27 1945
by serving subpoena
Mary Brill
Sheriff
Deputy Sheriff

THOMAS F. BRILL,

Complainant,

VS.

MARY BRILL,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER 1307.

ANSWER AND CROSS BILL

Now comes the Respondent and for answer to the Bill of Complaint filed in this cause and for her cross bill says:

1. She admits the allegations of paragraph numbered 1 of the Bill of Complaint.
2. Respondent denies the allegations of paragraph 2 of the Bill of Complaint, denies that she abandoned the Complainant in July, 1943 and for further answer to the said Bill of Complaint alleges that the Complainant and the Respondent lived together as man and wife in Baldwin County, Alabama until the Complainant left on March 20, 1945.
3. Respondent denies each and all of the other allegations of the Bill of Complaint.
4. Respondent is without funds to employ counsel to represent her in this litigation and is without funds to maintain and support herself.

PRAYER FOR PROCESS

Respondent prays that this Answer be taken and treated in all respects as a Cross Bill, that the usual process of this Honorable Court issue to the Complainant and Cross Respondent, Thomas F. Brill, requiring him to appear and plead, answer or demur to this Cross Bill within the time prescribed by law and under the rules and practice of this Honorable Court.

PRAYER FOR RELIEF

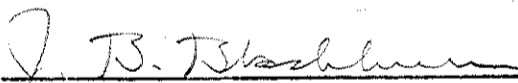
Respondent and Cross Complainant further prays for the following separate and several relief:

1. That a reference be held to ascertain and fix a reasonable sum to be paid to Respondent and Cross Complainant as alimony pendente lite and to ascertain and fix a reasonable amount to be paid to Respondent and Cross Complainant's solicitor of record for services rendered and to be rendered by him in this cause.

2. That when the said reference is held and the Register's Report made a Decree be rendered fixing the amount of alimony pendente lite and an amount to be paid to Respondent and Cross Complainant's solicitor for services rendered and to be rendered in this cause.

3. That on a final hearing of this cause the Court will make and enter a proper decree denying to the Complainant and Cross Respondent the relief prayed for by him in his Bill of Complaint and fix a reasonable amount to be paid Respondent and Cross Complainant for permanent alimony.

4. Respondent and Cross Complainant further prays for such other, further and general relief as she may be equitably entitled to the premises considered.


Solicitor for Respondent and Cross
Complainant.

1307

6/4/45
Service of the writs
accepted this day
Deborah Jane
by Sheriff
also for Camp

ANSWER AND CROSS BILL
THOMAS F. BRILL,
Complainant,
VS.
MARY BRILL,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 1307.

Filed June 6 1945
R. J. [Signature]
[Signature]