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TO THE

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

Comes FLORA BELL, and by this her Bill of Complaint,
presented against ROBERT BELL, respectfully shows:

FIRST: That Complainant and Defendant are both over
the age of twenty-one years; that both are now and have been
for more than five years bona fide residents of Baldwin County,
Alabama.

SECOND: That Complainant and Defendant were married
more than fifteen years ago and have lived together in Fairhope.

THIRD: That he has become cruel and abusive to her when
drinking and within the past week attacked her savagely with a
knife and tore her clothes partly off her and from this and
his previous actions she has reasonable cause to fear for her
life if she continues to live with him.

THE PREMISES CONSIDERED, Complainant prays that Robert
Bell be made party defendant to this cause, and by proper
process required to answer this Bill within the time prescribed
by Law.

Complainant further prays that upon the hearing of this
cause a decree be rendered forever divorcing her from said
Robert Bell, granting her the right to marry again should she
so desire and to have such other, further or different relief
as to equity may seem meet.

Beattie B. Riskaly
Solicitor for Complainant

FILED
NOV 1 1917

COMPTON FOR COMPLAINT

John D. ...

Dear Mr. ...

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BILL OF COMPLAINT

FLORA BELL, Complainant, vs ROBERT BELL, Defendant.

Filed April 19, 1945

No. 132P EQUITY.

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FLORA BELL
Complainant,

vs

ROBERT BELL,
Respondent.

E Q U I T Y .

CIRCUIT COURT OF

BALDWIN COUNTY, Alabama.

Comes ROBERT BELL, Respondent in the above styled cause and for answer to the Bill of Complaint says he denies all material allegations of same.

Respondent hereby waives notice of demand for oral examination of Complainant's witnesses, of the issue of commission to take testimony and of the right to introduce evidence in his own behalf. He further agrees that this cause may be submitted for final decree at any time on the pleading and Complainant's evidence as noted by the Register.

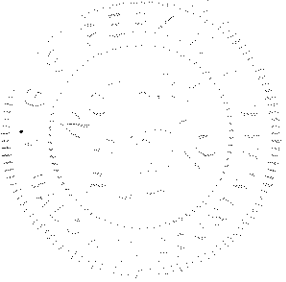
Robert Bell

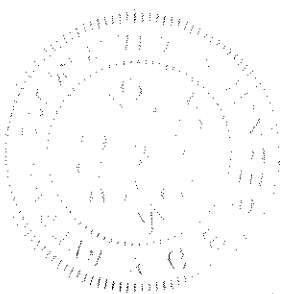
Respondent.

Before me, the undersigned Notary, personally appeared Robert Bell who is known to me to be the Respondent above named and who acknowledged that he executed the foregoing answer voluntarily with knowledge of its contents.

WITNESS MY HAND AND OFFICIAL SEAL THIS the 14th day of April, 1945.

E. G. Perkins
Notary Public, Baldwin County, Alabama.





MASSACHUSETTS DISTRICT COURT, WESTERN DISTRICT
[Signature]
1945

IN SENATE, JANUARY 19, 1945

FLORA BELL, Complainant,
vs.
ROBERT BELL, Respondent.

[Handwritten signature]

ANSWER & WAIVER

ROBERT BELL, Respondent,
vs.
FLORA BELL, Complainant.

[Handwritten signature]
19 April 1945

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THIS CASE BEING OPENED BY THE COURT, THE RESPONDENT HEREBY WAIVES HIS RIGHT TO FILE AN ANSWER TO THE COMPLAINT AND TO CONTEST THE VERIFICATION THEREOF.

ROBERT BELL, Respondent,
JAMES WATSON, Attorney

FLORA BELL, Complainant,
JAMES WATSON, Attorney

MASSACHUSETTS DISTRICT COURT, WESTERN DISTRICT
1945