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STATE OF ALABAMA,
BALDWIN COUNTY.

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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 Oratrix, Sarah Burney, respectfully represents and shows
unto Your Honor as follows:-

FIRST:

That she is a bona fide resident citizen of Baldwin County,
Alabama, residing at Summerdale, Alabama, and 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.

SECOND:

That Henry Burney is a resident citizen of Saucier, Mississippi,
Rt. #2; that he is over the age of twenty one years.

THIRD:

That your Oratrix and the said Henry Burney were lawfully married
in the year 1912, and lived together as husband and wife until, to-wit:-
March, 1925, at which time the said Henry Burney voluntarily abandoned
the said Sarah Burney, without just cause and without fault on her part;
that said act was committed in Baldwin County, Alabama.

THE PREMISES CONSIDERED Your Oratrix respectfully prays
that the said Henry Burney 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
Henry Burney, and that he 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 Oratrix, an absolute divorce from the said Henry Burney.

That if your Oratrix is mistaken in the relief prayed for then Your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled, she 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.