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The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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The State of Alabama, Circuit Court of Baldwin County, In Equity Baldwin County

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EDNA JACKSON,

Complainant,

-vs
MARVIN E. JACKSON,

Respondent.

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

PART ONE

Your complainant, Edna Jackson, respectfully represents unto your Honor that she is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama; that the respondent, Marvin E. Jackson, is also over the age of twenty-one years and a resident of Baldwin County, Alabama.

PART TWO

Your complainant further avers:

- 1. That she was legally married to the respondent, Marvin E. Jackson, on the 5th day of January, 1918, at Quitman Mississippi, and that both your complainant and the respondent have resided continuously in Baldwin County, Alabama, since the year 1922, with the intention of making the same their permanent residence.
- 2. That the issue of the marriage between complainant and respondent is two sons, Roscoe Jackson, now aged sixteen years and William Jackson, now aged fifteen years.
- 3. That since the marriage between your complainant and the respondent the said respondent has become addicted to habitual drunkenness.
- 4. That the respondent has many times committed actual violence on the person of your complainant and has threatened to kill your complainant and by reason of such conduct on the part of the respondent, your complainant's health has been endangered and her married life rendered intolerable to her. That at the present

time the respondent is confined in the penitentiary of the State of Alabama for assault upon your complainant and she is afraid to live with him any longer as his wife because of his habitual drunkerness and violence towards her when intoxicated and she desires a divorce from the respondent.

PRAYER FOR PROCESS

WHEREFORE, your complainant prays that your Honor will grant to her the writ of summons of the State of Alabama, commanding the respondent, Marvin E. Jackson, to appear before this Honorable Court within thirty days from the service of such writ to answer, demur or otherwise plead to this bill of complaint and to stand to and abide such order, and decree therein as to your Honor shall seem proper and your complaintant shall ever pray & c.

PRAYER FOR RELIEF

Your complainant further prays that upon the hearing of this complaint your Honor will grant to her a decree of absolute divorce from the respondent, Marvin E. Jackson, and that she may have such other and further relief in the premises as may be just and equitable.

FOOTNOTE

The respondent, Marvin E. Jackson, is hereby required to answer the allegations of part two of the foregoing bill of complaint from paragraph numbered one through paragraph numbered four, inclusive, but not underoath, oath to answer being hereby expressly waived.

Solicitor for Complainant.

MANNAGARA ditor for Complainant

Serve on Marvin E Jackson.

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