

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, William T. Roberson, respectfully represents and shows unto Your Honor as follows:-

FIRST:

That he is a bona fide resident citizen of Baldwin County, Alabama, residing at Robertsdale, Baldwin County, 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 Annie Roberson is a resident citizen of Baldwin County, Alabama, residing at Loxley, 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 Annie Roberson were lawfully married in the year 1923, and lived together as husband and wife, until to-wit:- the year 1927, at which time the said Annie Roberson voluntarily abandoned the bed and board of your Orator, without just cause and without fault on his part; that they have not lived together since; that said act was committed in Baldwin County, Alabama.

THE PREMISES CONSIDERED Your Orator respectfully prays that the said Annie Roberson be made party respondent to this bill of complaint by the usual process of this Honorable Court; that such orders,

decrees and publications he made as necessary to perfect service on the said Annie Roberson 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 Annie Roberson.

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.