

DOROTHY MILLER WILSON
Complainant,

-vs-

HORACE WILSON.
Defendant.

IN THE CIRCUIT COURT- EQUITY
SIDE. STATE OF ALABAMA.
BALDWIN COUNTY.

TO THE HONORABLE THE CIRCUIT COURT-EQUITY SIDE,
STATE OF ALABAMA, BALDWIN COUNTY, AND THE HON.
JOHN D. LEIGH JUDGE THEREOF, SITTING IN EQUITY.

Comes your Complainant, Dorothy Miller Wilson, and exhibits this her Bill of Complaint for divorce against Horace Wilson, and for grounds thereof shows:-

FIRST.

That your Complainant and the defendant are both over the age of 21 years and are bona fide residents of Baldwin County, Ala., residing near Fairhope, each of them having been such bona fide residents for more than 3 years next immediately preceeding the filing of this Bill of Complaint.

SECOND.

That the complainant and the defendant were married on heretofore to-wit, during the month of August, 1916, and lived together as husband and wife until to-wit, May 11th., 1928 when, on account of the matters and facts hereinafter complained of, your complainant was forced to leave the defendant.

THIRD.

That following the marriage of your complainant to the said defendant the defendant became and is now addicted to habitual drunkenness.

FOURTH.

That at the time your complainant was compelled to leave the defendant and for sometime prior thereto the defendant committed actual violence on her person, attended with danger to life or health, from time to time cursing, abusing and striking her; that his conduct was such that your complainant had reason to apprehend a continuance of such violence.

FIFTH.

That your complainant is possessed of no property in her own right nor does she have any income; the defendant is possessed of

considerable property consisting of interest in cattle, a mercantile business and a general meat market business and the defendant is an able-bodied man skilled in the cattle and butcher business and is able to does earn substantial income from such business.

PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your complainant prays that all necessary notices and summons issue to the defendant to make him party to this cause, requiring him to appear and plead, answer or demur within the time and under the pains and penalties prescribed by law and the rule of this court. Complainant further prays that your Honor order a reference to be held by the Register of this court to ascertain a reasonable amount to be paid your complainant by the defendant as alimony pendente lite and permanent, and the counsel fees in this cause, taking into consideration the value of the estate and the earning capacity of the defendant and the condition and state in life of the parties to this cause; upon such reference being so held that your Honor will grant unto your complainant a proper amount to be paid her as ^{alimony} pendente lite and attorneys fees.

That upon the final hearing of this cause your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between your complainant and defendant, be forever dissolved and that there be decreed unto the complainant, a proper amount as permanent alimony to be paid to her by the defendant. And, as in duty bound, she will aver pray, etc.

Dorothy Miller Wilson
Complainant.

NORBORNE STONE,
Solicitor for complainant.

FOOT NOTE:-

The defendant is required to answer each and every paragraph of the foregoing Bill of Complaint from "First" to "Fifth", both inclusive but answer under oath is hereby expressly waived.

Dorothy Miller Wilson
Complainant.

NORBORNE STONE
Solicitor for Complainant.

DOROTHY MILLER WILSON,
Complainant,

-vs-

HORACE WILSON,
Defendant,

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA,
EQUITY SIDE.

Comes the defendant, Horace Wilson and for answer to the complaint filed in the above styled cause, says:-

First: He admits the allegation contained in Paragraph First.

Second: He admits that he and the complainant were married during the month of August, 1916, and lived together until the year 1928; he denies that the complainant was forced to leave defendant and alleges the facts to be that your defendant is now willing and since separation has been willing to provide for his wife, the complainant, and alleges that there are no differences between the complainant and himself but alleges that the mother of complainant objects to the complainant living with defendant as his wife and that this is the reason of complainant and defendant not living together.

Third: Defendant denies the allegation contained in Paragraph Three and demands strict proof of same.

Fourth: Defendant denies each and every allegation contained in Paragraph Fourth and demands strict proof of same.

Fifth: Defendant does not state whether complainant owns any property or not but alleges to the best of his knowledge that she does not own any property having no income other than her daily earnings but that she is a strong and able bodied woman and willing and able to work. He denies that he owns any property at all; he states that he owns in his own name absolutely no property and that his income is very nominal, being no more than enough to provide for him and his wife when living together and under

the best condition; defendant alleges and states that he is now willing to provide and care for his wife, provided she will return to his home, as best as his financial and physical ability will permit.

HENRY D. MOORER,
Attorney for Defendant.

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THE STATE OF ALABAMA,
BALDWIN COUNTY.

SERVE ON
Circuit Court of Baldwin County
In Equity.

Received in office this 14th,
day of May 1928
Sheriff.

No.

SUMMONS

Dorothy Miller Wilson

Executed this 25th day May day of
1928
by leaving a copy of the within Summons with

RECORDED

vs.

Horace Wilson,

Horace Wilson Defendant.

(Guarantor)

C. A. Smith Sheriff.

By *B. D. Higgins* Deputy Sheriff.

Norborne Stone,
Solicitor for Complainant

Recorded in Vol. Page