

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

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon J.W.Hinote

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by Florence Hinote

against said J.W.Hinote.

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 20th day of July 1928

T.W. Richerson Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING.

Comes Florence Hinote herein called Complainant and humbly
complaining against J. W. Hinote herein called Defendant, and respectfully
shows unto your Honor as follows:

FIRST:

That your Complainant and the said Defendant are each over
the age of twenty one years and reside in Baldwin County, Alabama; that they
have resided in said County continuously for more than twelve months next
preceding the filing of this bill of complaint.

SECOND:

That your Complainant and the said Defendant are husband and
wife, having intermarried at Gateswood, Baldwin County, Alabama on to-wit,
May 19, 1900; that your Complainant and the said Defendant have seven children,
two of whom are over the age of twenty one years, namely, Janie Mborer, age
twenty five, and Peter Hinote, age twenty three; that the remaining five of
said children are minors, namely, James Hinote whose age is twenty, Mary Hinote
whose age is eighteen, Asie Hinote whose age is sixteen, Orentha Hinote whose
age is thirteen, Estell Hinote whose age is eight, William Hinote whose age
is five and Benjamin Hinote whose age is two; that the said minors reside
with and are in the custody of your Complainant.

THIRD:


That the said Defendant is of ungovernable temper and
frequently, without cause or provocation becomes angered at your Complainant,
curses and abuses her and threatens to kill her; that on to-wit, the 18th
day of July, 1928, at their home near Bay Minette, Alabama, without cause
or provocation he became angered with your Complainant and threatened to kill
her and beat her severally over the head, shoulders and arms with a stick or
club, and was only prevented from killing her, maiming her or of doing such

violence to her person as to injure her health, by your Complainant fleeing into the house; that on numerous other occasions the said Defendant has beat your Complainant with his fist and with sticks and tried to kill her; that he is constantly growing worse; that from his threats and conduct your Complainant has reason to fear that if she continues to live with him he will kill her or will injure her health.

Complainant further shows unto your Honor that the said Defendant is an able bodied man and competent to work and provide suitable living for your Complainant and for the said minor children, but that he fails and refuses to engage in any gainful occupation except on rare occasions and when he does work he fails and refuses to support your Complainant and the said children; that your complainant and the said minor children are without means of support and with their own labor are barely able to provide food sufficient to keep them alive; that they are without suitable clothing; that this complainant has no funds or property with which to employ counsel and prosecute this suit.

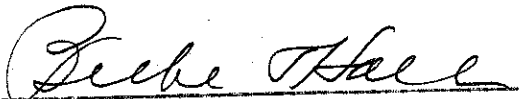
Wherefore your complainant prays this Honorable Court will take jurisdiction of the cause made by this bill of complaint; that the said J. W. Hinote be made a party defendant to the bill of complaint and by appropriate process be required to plead, answer or demur hereto within the time and under the penalties prescribed by law and the practice of this Honorable court; that upon the final hearing of this cause this Honorable court will make and enter a decree awarding to the complainant the custody of the said minors; that this court will ascertain and fix a suitable attorneys fee for complainant's attorneys in this cause and will ascertain and fix a suitable alimony to be paid by the said defendant to the complainant and will ascertain and fix a suitable contribution to be made by the said defendant for the support and maintenance of the aforesaid minors; that an order and decree be made and entered requiring the said Defendant to pay the said alimony,

the said attorneys fee and the said contribution to support the said minors,
and further that a decree be made and entered forever dissolving the bonds
of matrimony existing between your complainant and the said defendant. And
this complainant prays for such other, further or different relief as in
equity she shall be entitled to receive.


Solicitors for Complainant.

FOOT NOTE:

The defendant is required to answer all the allegations of
paragraphs one to three, both inclusive, but not under oath, oath being
hereby expressly waived.


Solicitors for Complainant.

2 Original

SERVE ON _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

Florence Hinote

RECORDED

vs.

J.W. Hinote,

By Wm. White

vs. Powell Higgins

Beebe & Hall.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this 20th

day of July 192

Sheriff.

Executed this 25th day of

July 192 5
by leaving a copy of the within Summons with
J. P. Hinote

Defendant.

B. Green

Sheriff.

By *B. O. Wiggins*
Deputy Sheriff.