

RETURN AFTER FIVE DAYS TO
EDWARD P. TOTTEN
LAWYER
BANK BUILDING
FAIRHOPE, ALABAMA



Hon. T. W. Richerson,

Register of Circuit Court,

Bay Minette, Alabama

Richerson

STATE OF ALABAMA
COUNTY OF BALDWIN

770
IN CIRCUIT COURT
IN EQUITY

Robert V. Jowers, Complainant,

vs.

Bill for Divorce

Lolete E. Jowers, Respondent.

TO THE HONORABLE JOHN D. LEIGHT, JUDGE OF SAID COURT:

Your Orator, Robert V. Jowers, respectfully shows unto your Honor as follows:

That both he and the Respondent, Lolete E. Jowers, are native born citizens of the United States, over the ages of twenty one years, and that for five years next preceding the commencement of this action they have been, and now are, resident citizens of Baldwin county, Alabama, living at the town of Fairhope therein;

That on the 2nd day of August, 1916, at Grove Hill, Alabama, your Orator and the Respondent intermarried and ever since have been, and now are, lawful husband and wife;

That to such marriage and union were born one son and two daughters, Robert Wilson, Lois Ethelma, and Maxine Mildred, aged eleven, nine and seven years, respectively, now living with the Complainant at his home in the said town of Fairhope;

That on or about the 31st day of December, 1927, the said Lolete E. Jowers committed adultery with one William Funk, and that at different times since the said 31st day of December, 1927, the said Lolete E. Jowers has committed adultery with the said William Funk;

That the said Lolete E. Jowers has been and is guilty of adultery, recognized as a ground for divorce under the provisions of Section 7407 of the 1923 Code of Alabama;

That the said Lolete E. Jowers is not a fit and proper person to have the care and custody of the three minor children, and that your Orator has a good home and is a fit and proper person to have the care and custody of the said three minor children;

THE PREMISES CONSIDERED your Orator respectfully prays that the said Lolete E. Jowers be made party respondent to this Bill of Complaint by the usual process of this Honorable Court 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:

Wherefore, your Orator prays that, upon the final hearing of this cause, the bonds of matrimony now and heretofore subsisting between himself and Lolete E. Jowers be wholly dissolved and that he be, by this Honorable Court, granted an absolute divorce therefrom; that by the order and decree of this Court your Orator may be awarded the care, custody and control of the three minor children, Robert Wilson, Lois Ethelma, and Maxine Mildred; that your Orator may have such other and further relief as to the Court shall seem just and equitable in the premises.

Dated at Fairhope, Baldwin county, Alabama, this tenth day of August, 1928.


Solicitor for Complainant

NOTE:

The respondent above named is required to answer every allegation contained in the foregoing Bill of Complaint, but not under oath; answer under oath being hereby expressly waived.


Solicitor for Complainant

LAW OFFICES OF
EDWARD P. TOTTEN
BANK BUILDING
FAIRHOPE, ALABAMA

Sept. 11th, 1928.

Hon. F. W. Richerson,
Register of Circuit Court,
Bay Minette, Alabama.

Dear Mr. Richerson:-

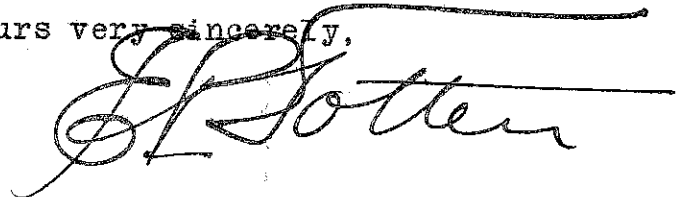
In re. JOWERS vs. JOWERS
In Equity, No. 770

By direction of my client, I request the withdrawal of Bill of Complaint in the above case and the dismissal of the pending action.

Will you kindly return to me ~~the~~ the Bill of Complaint, if permissible under the rules, together with statement of costs in case, your charges and the Sheriff's fee for service of Summons therein. Upon receipt of same, I will forward you check in payment.

With kind regards and all good wishes, believe me,

Yours very sincerely,

A handwritten signature in cursive script, reading "E. P. Totten", with a horizontal line drawn across the bottom of the signature.

Filed Sept 13th
1928
Josephine
Cigarettes