

SUSIE MARY BOOKER
COMPLAINANT

VS:

HENSON BOOKER
RESPONDENT.

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

TO the Honorable John D. Leigh, Judge of said Court, sitting in equity.

Susie Mary Booker brings this her bill of complaint against Henson Booker, and thereupon your oratrix pleads and says;

1. That your oratrix is over the age of eighteen years and resides in Perdido, in Baldwin County, Alabama and has been a bona fide resident of said State and County for more than three years last past; that the respondent Henson Booker is over the age of twenty-one years and is a resident of this State and County but is at the present time working at McKenzie, Alabama in Butler County and the State of Alabama.

2. That your oratrix and respondent intermarried in Baldwin County, Alabama, April 30, 1927.

3. That some time during the latter part of July, 1928 while your oratrix and respondent were temporarily staying at McKenzie, Butler County, Alabama and living together as man and wife the respondent did strike and injure your oratrix, and treated her with cruelty and inhumanity, thereby endangering her health and life, and that she can no longer in safety and comfort live with respondent.

4. That some time during the latter part of July, 1928 while your oratrix and respondent were living together as man and wife the respondent commenced treating her with cruelty and inhumanity; that upon various occasions he inflicted blows upon her in anger and with much violence, thereby endangering her health and life; that he has used vile epithets and insulting words and has adopted an offensive manner toward her and has offered at various times to do violence to her person and that in order to be safe she has had to take herself from his presence; that he has refused to supply her with the necessaries and comforts of life when it was within his power to do so; that he still persists in this course of treatment towards her; and

that she cannot with any degree of comfort or safety continue longer to live with him.

PRAYER FOR PROCESS AND RELIEF.

Wherefore, the premises considered, your oratrix prays that the said Henson Booker be made a party respondent to this bill of complaint; that the usual process of this Honorable Court be forthwith issued to her commanding her to demur, plead to or answer this bill of complaint within the time and under the penalties provided by law and under the rules of this Honorable Court; that upon a final hearing of this cause, a decree be rendered dissolving the bonds of matrimony now existing between your oratrix and respondent; that your oratrix be granted the right to marry again should she so desire; and such other further and different relief to which she may be entitled, the premises considered.


SOLICITOR FOR COMPLAINANT.

FOOT-NOTE-

The respondent is required to answer each paragraph of the foregoing bill of complaint, numbered, one (1), two, (2), three (3), and four (4), but not under oath, answer under oath being hereby expressly waived.


SOLICITOR FOR COMPLAINANT.

Curie Mary Booker
vs

Huron Booker

RECORDED

Filed Jan 18/1929.

T. W. Hillman
Register

Deft. A. Mc KENZIE
Butler Co Ala

The State of Alabama, {
Baldwin County.

No. 790

CIRCUIT COURT, IN EQUITY

Susie Mary Booker

Complainant.

vs.

Herman Booker

Defendant.

In this cause it appears to the Register
that a Summons requiring the Defendant Henson Booker

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the
service of said Summons upon Henson Booker
was served upon him by the Sheriff of Butler County, Alabama, on the
22nd day of February 1929

And the said Defendant ... having failed to demur, plead to or answer the said Bill of Complaint
to this date, it is now, therefore, on motion of Hon. S. C. Jenkins and F. G. Horn

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as
confessed against the said Henson Booker,

Defendant aforesaid.

This 24 day of March 1929

[Handwritten Signature]

Register.

**The State of Alabama,
Baldwin County**

Circuit Court In Equity

Susie Mary Booker

RECORDED
VS.

Henson Booker.

**Decree Pro Confesso On
Personal Service.**

Issued March 24th 19 29

T. W. [Signature]
Register.

The State of Alabama, }
BALDWIN COUNTY.

No. 790 CIRCUIT COURT IN EQUITY.

Susie Mary Booker

Complainant.....

vs.

Hensen Booker

Defendant.....

Motion is hereby made for a Decree Pro Confesso against

Hensen Booker

Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant.....ha. s..... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 24 day of March 192 9

Frank G. Holmes
S. A. Jenkins

Solicitor.....

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No. 790

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STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Susie Mary Booker

RECORDED

vs.

Henson Booker.

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed Mar 24 1929

T. W. [Signature]

Register.

Recorded in Record,

Vol. Page.....

Register.

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 Henson Booker,

of Butler 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 Susie Mary Booker

against said Henson Booker

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 18th day of January 1929.

T. W. Richerson Register

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

2nd Original
No 790

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.....

SUMMONS

Susie Mary Booker,

RECORDED

vs.

Henson Booker,

Mo Kenzie, Butler Co, Ala.

Hon. S.C. Jenkins,

Solicitor for Complainant

Recorded in Vol..... Page.....

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this.....

day of..... 192.....

Sheriff.

Executed this 21 day of

Jan 1929
by leaving a copy of the within Summons with

Henson Booker

Defendant.

R.E. Jones

Sheriff.

By R.E. Jones Jr

Deputy Sheriff.