

Josephine D. Huff,)
Complainant,)
-vs-)
George E. Huff,)
Respondent.

No. _____

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

PART I.

To the Honorable F. W. Hare, Judge of the Circuit Court of Baldwin County, Alabama, in Chancery sitting:

PART II.

Your Oratrix, Josephine D. Huff, a resident of the County of Baldwin, in this state, and over twenty-one years of age, respectfully exhibits this her Bill of Complaint against George E. Huff, a non-resident of the State of Alabama, and a resident of the state of Florida, residing at 165 Central Avenue in St. Petersburg therein, who is also over the age of twenty-one years.

PART III.

For complaint against said Respondent your Oratrix represents as follows:

1: That your Oratrix and said Respondent were legally married at Foley, Baldwin County, Alabama, on the 19th day of April, 1910, and that ever since said marriage your Oratrix has at all times conducted herself towards the Respondent as a faithful and dutiful wife.

2: That your Oratrix has been a bona fide resident of Baldwin County, Alabama, for more than three years preceeding the filing of this bill.

3: That in November, 1926, and more than two years preceeding the filing of this bill, the Respondent voluntarily abandoned your Oratrix and their children, and since that time has not lived with or supported either your Oratrix or their children.

4: That the issue of the marriage between these parties is three children, Eleanor R. Huff, aged twelve years, Walter A. Huff, aged eleven years, and Marion E. Huff aged eight years, and that

Subscribed in my presence and sworn to before me, this 7th
day of January, 1929.



[Handwritten Signature]
Notary Public.

Josephine D. Huff,)
Complainant,)
-vs-)
George E. Huff,)
Respondent.)

No. 2093.

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

Comes now George E. Huff, the above named Respondent, and enters his voluntary appearance in the above entitled cause, and expressly waives the issuance and service of process therein.

Dated at St. Petersburg, Florida, this 28 day of January, 1929.

George E Huff
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

RECORDED

Josephine D. Huff,
Complainant,

-vs-

George E. Huff,
Defendant.

VOLUNTARY APPEARANCE OF
DEFENDANT AND WAIVER OF
PROCESS.

Filed Jan 31/1929
D W Peckham
Register

Lloyd A. Magney,
Solicitor for Complainant.

LLOYD A. MAGNEY
ATTORNEY AND COUNSELLOR AT LAW
FOLEY, ALABAMA

January 30, 1929.

Hon. T. W. Richerson,
Clerk and Register,
Bay Minette, Alabama,

Dear Mr. Richerson:-

Herewith bill of Josephine D. Huff vs. George E. Huff, for divorce and also a voluntary appearance and waiver of process, signed by the defendant, as provided by Sec. 9436 of the Code. Hence no process will be necessary and the defendant will have thirty days from the date of filing in which to plead as I view it.

LAM:L.

Very truly yours,

