

Josephine D. Huff,

Complainant,

No.\_\_\_\_

-vs-

George E. Huff,

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

Respondent.

### 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, respect-fully 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 Gratrix 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

your Oratrix is a fit and proper person to have the custody and control of said minor children.

5: That your Oratrix has not in any way condoned Respondent's actions towards her.

#### . PART IV.

WHIREFORE, your Oratrix prays that she may be granted an absolute divorce from the Respondent; that she may be granted the custody of the before mentioned minor children of the parties and that she may have such other and further relief in the premises as may be just and equitable.

#### PART V.

And your Oratrix further prays that Your Honor direct that the Register of this Court make out and superinted the appropriate order of publication to George E. Huff, non-resident defendant, commanding him within thirty days after the period specified in the order of publication, to appear before Your Honor in this Honorable Court and then and there to answer all and singular the premises, and to stand to and abide such order and decree therein as to this Honorable Court shall seem meet; and your Oratrix shall ever pray, &c

Solicitor for Oratrix.

#### PART VI.

The Respondent, George E. Huff is hereby required to answer the allegations of Part III of the above bill, from section 1 to section 5 thereof inclusive, but not under oath, oath to said answer being expressly waived.

Solicitor for Oratrix.

STATE OF ALABAMA
COUNTY OF BALDWIN.

Josephine D. Huff, being first duly sworn, on her oath deposes and says that she is the Oratrix in the foregoing bill and has read and knows the contents thereof and the the same are true.

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

Notary Public.

Josephine D. Huff,
Complainant,
-vsGeorge 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 Z8 day of January, 1929.

George & Heiff Respondent IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

## RECORDED

Josephine D. Huff,

Complainant,

-VS-

George E. Huff.

Defendant.

VOLUNTARY APPEARANCE OF DEFENDANT AND VALVER OF PROCESS.

Ficed Jan 3/1929 De Recevior

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 necessaryand the defendant will have thirty days from the date of filing in which to plead as I view it.

LaM: L.

AMONDAMA

Very truly yours.