

Les	Lie Bracy.			The State of	A lahama
		mplalnant		rae State Or	Tittoutitug
No.			/_	Paldwin	County.
	vs.		2	Circuit Court	, in Equity.
<u> </u>	ljah Brady.			a de la compansión de l	allematers .
<u> </u>	<u> </u>	apondent	This	s the	tat day of
	•		/	June.	, 192 🏻
T.	this garage it hoi	ng made to appear	a to the Clerk	of this Count h	- the affidavit of
	*	•	4		
	9 B2863				
that the Defender	t Illiah Bri	NOV_ia_rasno:	ndent en	a that the	residence
is a non-resident of					
44					. (**
	· · · · · · · · · · · · · · · · · · ·		. 9		101688
and further, that, i	n the belief of sa	id Affiantthe	Defendant .		over the age of 21
years; it is, therefo	re, ordered that	publication be ma	de in the Balo	dwin Times, a ne	ewspaper publish
ed in Bay Minette,	Baldwin County	, Alabama, once a	week for fo	our consecutive	weeks, requiring
Elijah Brac		•		•	***
The state of the second se	₫- 			•	
V					**************************************
to answer or demu	r to the Bill of C	omplaint in this ca	ause by the	_6th	day of
July	192	or after thirty da	ys therefron	n a decree Pro	Confesso may be
taken against	-	. ,	-		
enronosquise	काचाचकु ग्रामाया ५ मायाव्या माथा ही कीचा	The second second	7	WAR	un.
	ge%	e e		1	Register

LIBLE BRACK.

Complainent.

em T/ SI em

IN THE CIRCUIT COURT-EQUITY SIDE STATE OF ALABAMA,

BLIDWIN COUNTY.

MANUEL BROW.

Respondent.

TO THE HONOIGELM. THE CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALLWIN COUNTY, AND THE HON. FRANCIS W. HARE, JUDGE THEREOF, SITTING IN EQUITY:

Comes your doublement, leslie Bracy, and by leave of the Court first had and obtained Amends her original Hill of Complaint in this cause of stiking from said Complaint paragraph "FIRST", and inserting in dieu thereof the following paragraph "FIRST", via:-

That your Complainant and the Respondent are over the age of twenty-one years and that your Complainant is a bone fide resident of Alabama, residing at Fairhope in Baldwin County. Alabama; that the residence of the Respondent is not known to your Complainant although she has made dilligent effort to ascertain same; that you Complainant has been a resident of Baldwin County, Alabama, for more than three years next immediately preceeding the filing of this Bill of Complaint.

Solicitor for Complainant.

FOOT MOTE: *

The Respondent, Elijah Bracy, is required to answer each and every paragraph of the foregoing amended Hill of Complaint from FIRST to FOURTH, inclusive, but answer under cath is hereby expressly waived.

Solicitor for Complainant.

CIRCUIT COURT, BALDWIN COUNTY, ALA.,

IN EQUITY. Lele More vs.

No.

Plaintiff

Defendant

REGISTER.

FEES OF REGISTER		Dollars	Cts.	BROUGHT FORWARD
iling each bill and other papers	10		90	For receiving, keeping and paying out or distribut-
ssuing each subpoena			5 -	
ssuing each copy thereof	40		Zw _	\$1,000, and not over \$5,000, 3-4 of 1 per cent;
Intering each return thereof			y	all over \$5,000, and not exceeding \$10,000, 1-2
For each order of publication			13	of 1 per cent; all over \$10,000, 1-4 of 1 per cent.
ssuing writ of injunction		/	ند ت	1
For each copy thereof	- 50			Receiving, keeping and paying out money paid in-
- ·	15	<i>'</i>		to court, etc., 1-2 of 1 per cent of amount re-
Entering each return thereofssuing writ of attachment				ceived
	15			Each notice sent by mail to creditors 15
Entering each return thereof			١,	Filing, receipting for and docketing each claim, etc. 25
Docketing each case	•	1	10 L)	For all entries on suppoens docket, etc. 504
Entering each appearance		1 '		For all entries on commission docket, etc 50
ssuing each decree pro confesso on persiser				Making final record, per 100 words 15 2
		· /.	00	
Each order appointing guardian				Report of divorce to State Health Office 50
Any other order by Register	50			[Acts 1915]
ssuing commission to take testimony	50			Total fees of Register
Receiving and filing	10	ĺ		7/5/2
Endorsing each package	10.		50	RESE OF STEERING
Entering order submitting cause	50		P	FEES OF SHERIFF
" any other order of court	25		1.	Serving and returning subpoena on deft\$ 1 50
Noting all testimony	50		30	Serving and returning subpoens for witness 65
Abstract of cause, etc.	1 00	,	0.0	Levying artachment 1 50
Entering each decree	75	'	>3-	Entering and returning same 25
For every 100 words over 500	15		, ,	Selling property attached
Faking account, etc.	3 00			Impaneling jury 75
" testimony, etc	15	ح ا	00	Preduting writ of possession 2 50
Each report, 500 words or less	2 50			Collecting execution for costs 1 50
For every 100 words over 500	15			Serving and returning sci. fz., each65
Amount claimed less than \$500, etc.	2 00		İ	Serving and returning notice
ssuing each subpoens	25		l .	Serving and returning writ of injunction 1 50
Witness certificate, each	25			Serving and returning writ of exeat
ssuing execution, each	75			Taking and approving bonds, each
Entering each return	15			Collecting money on execution
Taking and approving bond, each	1 00			Making deed
Making copy of bill, etc.	15			Serving and returning application, etc 1 00
Each notice not otherwise provided for	50	. '		Serving attachment, contempt of court
Each certificate or affidavit, with seal	50			Total fees of Sheriff
" " , no "	25			rotarices of Shellif
learing and passing on application, etc	3 00		1	
Cach settlement with receiver, etc.	3 00			RECAPITULATION
xamining each youcher of receiver, etc	10			Register's Fees
" answer, etc				Sheriff's Fees
Recording resignation, etc	75			Commissioner's Fees
Entering each certificate to Supreme Court	50			Solicitor's Fees
Saking questions and answers, etc.	25	٠.	i l	Wisness Fees
or all other service relating to such proceedings				Guardian Ad Litem
	1 00			Printer's Fees
or services in proceeding to relieve minors, etc.,				Trial Tax 3 60
same fees as in similar cases.		- 5 61		
Commission on sales, etc.: 1st \$100, 2 per cent;	Î	× **		Recording Decree in Probate Court
all over \$100, and not exceeding \$1,000, 1 1-2				Total Color
per cent; all over \$1,000 and not exceeding				7-519
\$20,000, 1 per cent; all over \$20,000, 1.4 of				125
1 per cent.		4.		
SUB TOTAL CARRIED FORWARD			1 A A I	and the same of th

Received payment this_____day of______19____

The State of Alabama, Baldwin County.

Circuit Court of Baldwin County, In Equity.

To any Sheriff of the State of Alabama—GREETING	3:	
WE COMMAND YOU, That you summon		
	<u>கள் நாகள் குறிகளையுள்ள இவற்ற இவற்றையுக்க</u> வ	· · · · · · · · · · · · · · · · · · ·
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ofMobile County, to be and a	opear before the Judge of	the Circuit Cour
of Baldwin County, exercising Chancery jurisdiction, w		
nons, and there to answer, plead or demur, without oat		
Leslie $\mathbb{B}_{\mathbf{l}}$	acy	· · · · · · · · · · · · · · · · · · ·
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gainst said		
Elijah ^B racy		
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and further to do and perform what said Judge shall or	don and direct in the Last 1. I	ole A 3 -11 - 21
said Defendant shall in no wise omit, under penalty, etc		
this writ with your endorsement thereon, to our said Co	ourt immediately upon the	execution thereo
WITNESS, T. W. Richerson, Register of said Ci	rcuit Court, this	13thday o
March 192 9.	-	
	Meier	*

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TO STATE

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CONTRACTING

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COLEGEA. TLIMING

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Original

ircuit Court of Bald In Equity	
No	
SUMMONS	
Leslie Bracy	
22632	
	A
July vol	4
Elijah Bracy.	
1314 ada	a Po
Mofi	<u>u ula</u>
Norborne Stone.	CONTRACTOR AND ADMINISTRATION OF THE STATE O
	for Complaina

THE STATE OF ALABAMA. BALDWIN COUNTY

Received in office this	.3th 9
	Sheriff.
Executed this	day of
by leaving a copy of the wit	hin Summons with
llyah Br	act at
Cause of	Defendant.
(h) Ben	Sheriff.
By Q. Y shel	Deputy Sheriff.

to support it.

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

Leslie Bracy	omplainant.
VS.	
Elijah Bracy,	Respondent.
T.W.Richerson,	· · · · · · · · · · · · · · · · · · ·
as Register and Commissioner have called and caused to come before me Lelis Bracy, Virginia	
,	•••••
	•••••
witnesses named in the Requirement for Oral Examination, on the 25 day	y of Sept
1929, at the office of Register	
in Bay Minette-A, Alabama, and having first sworn said wi	tness es to speak the
truth, the whole truth, and nothing but the truth, the said	s
doth depose and say as follows:	
Leslie Bracy, the complainant who being duly sworm te	stified as
follows:- My name is Lealie Bracy, I am over the age 2	the age of &1 yras, 1 years, and am
the Complainant in that cetraain cause wherein Lesli	
and Elijah Bracy is Respondent; which cause is pending Equity Side, State of Alabama, Baldwin County; I am a	
of Baldwin County, Alabama, residing at Fairhope, Ala	bama, and have been
such a resident for the past three years next immedia filing of my Bill of Complaint in above styled cause;	
the said Elijah Bracy lives although I have made dill	igent inquery to
ascertain the xame. Im married Elijah Bracy, the res	
until April 4th., 1928nat which time he abandoned and just excuse. While I was living with said Elijah B	
bad; he Beat me twice, once with his fists and once w	
time he beat me I was sing as sick in bed, about to gi	ve birthhto a child;
This second beating was only two weeks before my chil	d was born
I left him as soon afterwards as possible about 4 we	eks after my child
was.born,this.child.is.now.living.named.Helen.Louise.	Bracy I am a fit
person to have the care custody and control of this c	hild and am able

I,	.W.Richerson	1 	, as Register	and Commission	ner hereby c	ertify
that the foreg	oing deposition	on Oral Examin	nation was taken do	wn in writing b	yme in the	words
of the witness	es and read ove	r to them	and they si	gned the same	in the prese	nse of
myself	and E	on.John Ch	ason ,one of	the Attys	for Comp	<u>lain</u> ant
at the time an	d place herein me	entioned; that I	have personal know	ledge of person	al identity o	f said
witness es	or had proof m	ade before me o	f the identity of sai	d witness_es	; that I am	not of
counsel or of	kin to any of the	parties to said o	cause, or any manne	er interested in	the result t	hereof
I enclos	se the said Oral E	xamination in ar	n envelope to the R	egister of said	Court.	
Given u	ınder my hand an	d seal, this2	3rdday of	Sept	1929	
			3rd day of	éeuu		(L. S.)
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			and the second of the second o	المتعاض المتعاضي في المعاون والمعاون المتعاونة		
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	5	9		2	THE STATE OF ALABAMA BALDWIN COUNTY COURT, IN EQ	
1 1	Re	Oral Deposition Refit 2-3		7	BALDWIN COUNTY	
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	, , , , , , , , , , , , , , , , , , ,	S On	Comp	06	EQ.	
Register	₹ Register.	on 3,192,5	Complainant		MA	1
er	ā.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	. 현 1 - 🌓 - 동-	1, 1	• " II	1 .1

M DWAC icherson Co.

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE ADVERTISING RATES GIVEN ON APPLICATION

Leslie Bracy Vo Elijoh/Browy - 171 mosy/2

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE ADVERTISING RATES GIVEN ON APPLICATION

R. B. VAIL EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

NOTICE TO NON-RESIDENT	,
The State of Alabama, Baldwin	ALFIDAVIT OF PUBLICATION
County. Circuit Court, in Equity. This the 1st. day of June, 1929. Leslie Bracy, Complainant, vs. Elijah	STATE OF ALABAMA, BALDWIN COUNTY.
Bracy, Respondent. In this cause it being made to appear to the Clerk of this Court by the affidavit of Leslie Bracy and Elijah	being duly sworn, deposes and says that he is
Bracy is respondent, and that the residence of the respondent, Elijah Bracy,	To the public of the state of t
is unknown and cannot be ascertained after diligent inquiry made on part of affiant; and further, that, in the be-	Minette, Baldwin County, Alabama; that the notice hereto attached of
lief of said Affiant the Defendant is over the age of 21 years; it is, there-	Leslie Pracey US Olijah Braces
fore, ordered that publication be made in the Baldwin Times, a newspaper pub-	
lished in Bay Minette, Baldwin County, Alabama, once a week for four conse- cutive weeks, requiring Elijah Bracy	
the said respondent to answer or de- mur to the Bill of Complaint in this	
cause by the 6th day of July, 1929, or after thirty days therefrom a decree Pro Confesso may be taken against	
Elijah Bracy, the defendant. T. W. RICHERSON	
18-4t Register	
isaues:	Was published in said Newspaper for consecutive weeks in the following
Date of first publication	June 6 1929 Vol. 40 No. 18
Date of first publication	June 6 1929 vol. 40 No. 18 June 13 1929 vol. 40 No. 19
Date of first publication Date of second publication Date of third publication	June 6 1929 vol. 40 No. 18 June 13 1929 vol. 40 No. 19 June 20 1929 vol. 40 No. 20
Date of first publication Date of second publication Date of third publication Date of fourth publication	June 6 1929 vol. 40 No. 18 June 13 1929 vol. 40 No. 19 June 30 1929 vol. 40 No. 20 June 27 1929 vol. 40 No. 21
Date of second publication Date of third publication Date of fourth publication	June 20 1929 vol. 40 No. 19 June 27 1929 vol. 40 No. 20
Date of second publication Date of third publication Date of fourth publication	June 20 1929 Vol. 40 No. 19 June 27 1929 Vol. 40 No. 20
Date of second publication Date of third publication Date of fourth publication	June 20 1929 Vol. 40 No. 19 June 27 1929 Vol. 40 No. 20
Date of second publication Date of third publication Date of fourth publication	June 20 1929 vol. 40 No. 19 June 27 1929 vol. 40 No. 20

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned authority in and for said County in said State, personally appeared Leslie Bracy who is known to me and who, after being by me first duly and legally sworn, doth depose and say under oath as follows:-

That her name is Leslie Bracy; that she is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama, residing at Fairhope, Alabama; that she is the Complainant in that cause now pending in the Circuit Court-Equity Side, State of Alabama, Baldwin County, wherein Leslie Bracy is Complainant and Elijah Bracy is Respondent; that the residence of the Respondent, Elijah Bracy, is unknown and cannot be ascertained after dilligent anguiry made on part of affiant.

Lesli Brazie

Sworn to and subscribed before me, a Notary Public, whose seal is hereto affixed, this 22 day of May, 1929.

Notary Publica Baldwin County,
Alabama.

STATE OF ALABAMA,)	CIRCULT COURT, IN	EQUITY.
Baldwin County.	No. 801	Repl	Term, 192
		:	
	Lulil Br	cely	, Complainant
	vs.		
8	elijah 1	Brey	, Defendant
To Imleve	,,,	Register:	
,			
In the above stated cause a	Decree Pro Confesso h	aving been taken as	gainst the Defendant,
and evidence having been taken, a	nd the cause being rea	dy for submission fo	r final decree, and no
		••_	
defense having been interposed, t	the Complainant, by		
	Solicitors of record	l, now files with the	Register of this Court
this written request to deliver the	e papers in this cause t	o the Judge for final	decree in vacation.

Solicitor for Complainant.

The	State of	Alahan	าล 🦙	CI	RCUIT COURT, IN EQ	UITY.
	BALDWIN CO		}	_{No.} 801	Sept 6th	Term, 192
		Teslie	Bracy			
***************************************						Complainants
			•			
		ı	V\$.			
***************		Eli	jah Bracy		·	Defendants
M-4		1. f	D: 0 6 :::	*		
MOL					,	
		Eli,	ah Bracy		·	Defendant
in the anne	exed stated cause,	on the ground t	hat more than t	hirty days ha	ve elapsed since the per	fection of publication
		4			proof to the Court the	
		tara Court, Rate	TI MAYING BEEN	shown by Gue	e proof to the Court the	t said Defendant is a
non-resider	nt of the State of	Alabama, and l	nas failed to ans	wer, plead or	demur to the Bill in th	is cause, to the date
hereof.				•	Entertain State (1997)	•
Thi	3/4	day of	Que	₹.	102 P	
1116	* ·······	udy Ur	/	X , 1		
746 Code.	•				10 forme	Slowe
				V .		Solicitor.

The State of Alabama,	CIRCUIT COURT, IN EQUITY.			
Baldwin County.	No.801	Sept 2n	dTerm, 192.9_	
Leslie Bracy	· · · · · · · · · · · · · · · · · · ·		Complainant	
vs. Elijah Bracy			Defendant	
In this cause it appears to the Register		tha	t the order of publi-	
cation heretofore made in this cause, was pub	lished for four cons	ecutive weeks,	commencing on the	
6th day of June	, 192 9 , in the	Baldwin T	imes	
a newspaper published in Bay Minette	Alabama, tha	t a copy of sa	id order was posted	
at the Court House door in Baldwin	Coun	ty, on the61	h day of	
June 192 9 &&&&	· · · · · · · · · · · · · · · · · · ·			
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And it now further appearing to the R			the second second	
Edijah Bracy				
			•	
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		* * * * * * * * * * * * * *		
having to the date hereof failed to demur, ple	ad to or answer the	Bill of Compla	aint in this cause, it	
is now, therefore, on motion of Complainant.	., ordered and dec	reed by the R	egister	
that the Bill of Comp				
taken as confessed against the said Leslie				
,		•		
		400 0		
This 2ndday of Septem	DW Re	192¥.•		
	11/1 lu		Register.	

No. 801.		Page		
The State	e of A	Alabai	ma,	, .
CIRCUIT CO	OURT,	IN EQL	JITY.	जें -
Leslie Brac	У			
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Flatah Desa	vs.		2.	
Elijah Bracj	<u>/</u>	***************************************	**************************************	
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ssued Sept	2nd		192 9.	
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Acore Printing Company		Regi	ster.	

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STATE OF Al Baldwin C	
CIRCUIT COURT,	IN EQUITY.
Leslie Bracy	
•	
	Complainants.
Vs.	
Elijah Bracy	
Tarifor Drack	
44444444444444444444444444444444444444	
	Defendants.
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No. 801	Page
BALDWI	OF ALABAMA N COUNTY JRT, IN EQUITY
Lulie	Brey
Elige	e Bacy
	OR DECREE IN
FILED ALJA	7 2 3 192 7 Lever
	Register
RECORDED IN	RECORD
VOL	PAGE Register

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LESLIE	BRACY,	
	Complainant,	
er A2 er	or TRES on	IN THE CIRCUIT COURT-EQUITY SIDE
	-VS	STATE OF ALABAMA,
ELIJAH	BRACY,	BALDWIN COUNTY.
	Decmondent	

TO THE HONORABLE, THE CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY, AND THE HON. FRANCIS W. HARE, JUDGE THEREOF, SITTING IN EQUITY:

Comes your Complainant, Leslie Bracy, and by leave of the Court first had and obtained Amends her original Bill of Complaint in this cause by striking from said Complaint paragraph "FIRST", and inserting in lieu thereof the following paragraph "FIRST", viz:-

That your Complainant and the Respondent are over the age of twenty-one years and that your Complainant is a bona fide resident of Alabama, residing at Fairhope in Baldwin County, Alabama; that the residence of the Respondent is not known to your Complainant although she has made dilligent effort to ascertain same; that you Complainant has been a resident of Baldwin County, Alabama, for more than three years next immediately preceeding the filing of this Bill of Complaint.

solicitor for Complainant.

FOOT NOTE: -

The Respondent, Elijah Bracy, is required to answer each and every paragraph of the foregoing amended Bill of complaint from FIRST to FOURTH, inclusive, but answer under oath is hereby expressly waived.

Solicitor for complainant.

8581 NOTE OF TESTIMONY

Leslie Bracy	
	THE STATE OF ALABAMA, BALDWIN COUNTY
vs. Elijah Bracy	IN EQUITY, CIRCUIT COURT OF BALDWIN COUNTY.
	nant upon the original Bill of Complaint,
decree pro confesso by publication s	and testimony of Leslie Bracy
and Virginia Samuels,	
(
	······································
and in behalf of Defendant upon	· · · · · · · · · · · · · · · · · · ·
	mm.

Register.

DECREE OF DIVORCE		Moore Printing Co., Bay Minette, Ala.
The State of Alabama, Baldwin County	No. 801.	CIRCUIT COURT IN EQUITY
Le kli e Bracy	F	()t
	vs.	Complainant
Elijah Bra	.cy	Defendant
This cause, coming on to be heard at decree pro confesso and the testimony as note Court is of opinion that the Complainant is en IT IS, THEREFORE, Ordered, adjudymony heretofore existing between the Complainant	d by the Register; an titled to the relief pr ged and decreed by the	d upon consideration thereof, the ayed for in said bill. he Court, that the bonds of matri-
solved, and the complainant is forever divorce	d from the Defenda	ant, on account of
Cruelty, on the part of Elijah	Bracy toward	Leslie Bracy,
·	T = - 1 & = There = ==	
It is further ordered, that the said		
be, and _s_ he is hereby permitted to again Court in this cause.	contract marriage, u	opon the payment of the costs of
it is further progred, that the said	eslie Bracy	<u> </u>
pay the costs herein taxed, for which execut	ion may issue, and	if such execution is returned "no
property found," then execution for such costs	may issue against tl	he said
Elijah	Bracy	
It is further ordered, adjudged and decr	eed that the said	Lesiie Bracy
shall not again marry except to saidEl	ijah Bracy	
until sixty days after this date, and that if an	: 1	
narry again except to saidElij	ah Bracy,	
nairy again except to said		
		during the said pendency of appeal
It is further ordered and dec	reed that Lesi	lie Bracy have
have the care, custody and c	ontraol of He	len Louise Bracy a
girl child born of this marra		
This 2 4 th day of Sept	ember	19.29.
		F. W. Hare
	JUDGE OF THE C	CIRCUIT COURT OF BALDWIN COUNTY
STATE OF ALABAMA (BALDWIN COUNTY)	CIRCUIT COU	JRT, IN EQUITY
I, County, Alabama, do hereby certify that the	, Rabove is a full, true	egister of said Circuit Court of said and correct copy of the decree
endered by said Court on the	day of	9,
n the cause of	4.	
		•
		Complainant
	vs.	
s appears of record in said Count		Defendant

as appears of record in said Court.

day of ___

Witness my hand and the seal of said Court, this the

__, 19____

- Register

LESLIE BRACY,
Complainant.

IN THE CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA,

BALDWIN COUNTY.

-VS-

ELIJAH BRACY,

Respondent.

TO THE HONORABLE, THE CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY, AND THE HON. FRANCIS W. HARE, JUDGE THEREOF, SITTING IN EQUITY.

Comes your Complainant, Leslie Bracy, and exhibits this, her Bill of Complaint for Divorce against the Respondent, Elijah Bracy, and shows:-

FIRST. That your Complainant and the Respondent are over the age of twenty-one years and are bona fide residents of Alabama, your Complainant residing at Fairhope, Alabama, and the Respondent residing at 1314 Adam Street, Mobile, Alabama; that your Complainant has been such a resident of Baldwin County, Alabama, for more than three years next immediately preceeding the filing of this Bill of Complaint.

SECOND. That your Complainant and the Respondent were married on heretofore, to-wit: November 16th., 1925 and lived together as man and wife until April 4th., 1928 at which time the said Respondent abandoned and deserted your Complainant without just or legal excuse.

THIRD. That while your Complainant and the Respondent were living together as man and wife, said Respondent treated your Complainant in a cruel and inhuman manner; that said Respondent beat your Complainant while she was pregnant and committed actual violence on her person, attended with danger to life or health and from his conduct there was reasonable apprehension of such violence from time to time.

FOURTH. That by said marriage there was born to your Complainant a female child named Helen Louise, now of tender age; that your Complainant is a fit and proper person to have the care, custody and control of said child while the Respondent is not such a fit and proper person.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, your Complainant prays that all necessary notices, orders and decrees be made, entered and issued necessary to make the daid Elijah Bracy party Defendant hereto, requiring him to appear and plead, answer or demur, within the time and under the pain and penalties prescribed by law and the rules of this Court; that upon a final hearing of this cause that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between your Complainant and/Respondent be forever dissolved; that byour Complainant be again permitted to contract the marriage relation should she so desire and that your Honor will render, adjudge and decree that your Complainant is a fit and proper person to have the care, custody and control of said child and that the same be awarded to her and as in duty bound, she will ever pray, etc.

MORBORNE STONE.
Solicitor for Complainant.

FOOT NOTE:-

The Respondent, Elijah Bracy is required to answer each and every paragraph of the foregoing Bill of Complaint from First to Fourth, inclusive, but answer under oath is hereby expressly waived.

Solicitor for Complainant.