

The State of Alabama,  
Baldwin County.

{ Circuit Court of Baldwin County, In Equity.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon

David Tarvin

Blacksher Ala.

of Baldwin 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

Barrie Tarvin

against said

David Tarvin

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 31st day of

July 1929

T. W. Richerson Register

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

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes CARRIE TARVIN, and by this her bill of complaint presented against DAVID TARVIN, respectfully shows:

FIRST: That she and the said David Tarvin are both over the age of twenty-one years and are now and have been all of their lives residents of the state of Alabama, she now living in the city of Mobile and the said David Tarvin living at Blacksher, Baldwin County, Alabama.

SECOND: That she and the said David Tarvin were legally married at Castleberry, Alabama, in the month of February, 1906, and lived together as husband and wife at Blacksher until the year 1914, when because of his behavior she left him, residing in Blacksher two years and then coming to Mobile where she has lived since.

THIRD: Complainant says that she left the Defendant because he was untrue to her, and because of his cruelty. That during their married life he had repeatedly beaten her, and in 1914 just before she left him he beat her so severely with a stick that she was confined to her bed for five weeks, and seriously injured by reason of this ill-treatment.

Complainant further says that because of the actual violence committed to her person and from his previous conduct she believes that had she continued to live with him he would have seriously endangered her health, if not her life.

FOURTH: Complainant further says that she has lived separate and apart from the bed and board of the said David Tarvin for five years immediately next prior to the filing of this bill, and without support from him for such period, and has been during this time, and all of her life prior, a bona fide resident of the state of Alabama.

THE PREMISES CONSIDERED, Complainant prays that the said David Tarvin be made party defendant to this bill and by appropriate process be required to answer same within the time required by law.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes CARRIE TARVIN, and by this her bill of complaint presented against DAVID TARVIN, respectfully shows:

FIRST: That she and the said David Tarvin are both over the age of twenty-one years and are now and have been all of their lives residents of the state of Alabama, she now living in the city of Mobile and the said David Tarvin living at Blacksher, Baldwin County, Alabama.

SECOND: That she and the said David Tarvin were legally married at Castleberry, Alabama, in the month of February, 1906, and lived together as husband and wife at Blacksher until the year 1914, when because of his behavior she left him, residing in Blacksher two years and then coming to Mobile where she has lived since.

THIRD: Complainant says that she left the Defendant because he was untrue to her, and because of his cruelty. That during their married life he had repeatedly beaten her, and in 1914 just before she left him he beat her so severely with a stick that she was confined to her bed for five weeks, and seriously injured by reason of this ill-treatment.

Complainant further says that because of the actual violence committed to her person and from his previous conduct she believes that had she continued to live with him he would have seriously endangered her health, if not her life.

FOURTH: Complainant further says that she has lived separate and apart from the bed and board of the said David Tarvin for five years immediately next prior to the filing of this bill, and without support from him for such period, and has been during this time, and all of her life prior, a bona fide resident of the state of Alabama.

THE PREMISES CONSIDERED, Complainant prays that the said David Tarvin be made party defendant to this bill and by appropriate process be required to answer same within the time required by law.

Complainant further prays that an order of reference be made instructing the Register of this Court to ascertain and report upon a suitable amount to be allowed her as counsel fees and as alimony pendente lite, and that upon the report of said Register the Defendant be ordered and decreed to pay her such sums for said purpose as to your Honor may seem proper. That upon the hearing of this cause a decree be rendered divorcing her from the said David Tarvin, granting her the right to marry again should she so desire, and allowing her such sum for permanent alimony as the estate of said Defendant may justify. Also that she may have such other and further relief as to equity may seem meet.

*Elliot B. Rinkley*  
Solicitor for Complainant.

NOTE:

The Defendant is required to answer each and every paragraph of the foregoing bill, but not under oath.

*Elliot B. Rinkley*  
Solicitor for Complainant.

*Original*

SERVE ON

Circuit Court of Baldwin County  
In Equity.

No. *834*

SUMMONS

*Barrie Tarvin*

vs.

*David Tarvin*  
*Blackburn*  
*or Blackburn*

*E. G. Nickarby*

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this *31st*  
day of *July* 192*9*

Sheriff.

Executed this *Sept 2nd* day of  
192*9*

by leaving a copy of the within Summons with

*Dave Tarvin*

Defendant.

*Blackburn*

Sheriff.

By Deputy Sheriff.

<sup>105</sup>  
Original Bill

Barrie Tarwin

vs

David Tarwin

Filed July 31/1929  
T. H. Dickerson  
Register

RECORDED

E. G. Rickarby  
Atty for Complainant