STATE OF ALABAMA, BALDVIN COUNTY.

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IN THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Your Oratrix, Lula Johnson, respectfully represents and shows unto Your Honor as follows:-

FIRST:

That she is a bona fide resident of Baldwin County, Alabama, residing at Hurricane, in said County and has resided in Baldwin County for more than three years immediately preceeding the filing of this bill, and that she is over the age of twenty one years.

SECOND:

That Walter Johnson is over the age of twenty one years, and his place of residence unknown, and that she has exercised reasonable diligence, and made reasonable effort to obtain the residence of said Walter Johnson.

THIRD:

That your Oratrix and said Walter Johnson were lawfully married during the year 1925, and lived together as husband and wife until May 1924 at which time the said Walter Johnson abandoned your Oratrix without fault on her part, and that the said act was committed in Baldwin County, Alabama during the month of May 1924.

The premises considered your Oratrix respectfully prays that the said Walter Johnson be made party respondent to this bill of complaint by the usual process of this Honorable Court; that such orders, decrees and publications be made as necessary to perfect service under said Walter Johnson, that he be required to demur, plead to on enswer the same within the time and under the penalities as provided by law.

PRAYER FOR RELIEF:

That upon the final hearing of this cause your Honor will grant unto your Oratrix an absolute divorce from the said Walter Johnson. That if your Oratrix is mistaken in the relief brayed for then that Your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled, she will pray.

HENRY D. MOORER,

Attorney for Complainant.

FOOTHOTE:

Defendant is required to answer each and every ellegation contained in the foregoing bill of complainant, number one to three, inclusive, but not under oath. Answer under oath is hereby expressly waived.

HENRY D. MOORER.

Attorney for Complainant.