

STATE OF ALABAMA,
BALDWIN COUNTY.

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA.
IN EQUITY.

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

Your Orator, Hosey Williams, respectfully represents and
shows unto your Honor as follows:

FIRST:

That he is a bona fide resident citizen of Baldwin County,
Alabama, residing at Bay Minette, Alabama, and has resided in Bal-
dwin County, Alabama, for more than three years next preceding
the filing of this bill; That he is over the age of twenty-one
years.

SECOND:

That Mary Williams is over the age of twenty-one years, and
her address is White House Fork, Baldwin County, Alabama.

THIRD:


That your Orator and the said Mary Williams were lawfully
married and lived together as husband and wife until the latter
part of July, 1928, at which time the said Mary Williams volun-
tarily abandoned your Orator without just cause and without fault
on the part of your Orator. Said act was committed in Baldwin
County, Alabama.

THE PREMISES CONSIDERED, Your Orator respectfully prays that
the said Mary Williams 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 per-
fect service on the said Mary Williams and that she be required
to demur, plead to or answer the same within the time and under
the penalties as provided by law or that the same be forever con-
fessed.

PRAYER FOR RELIEF:


That upon the final hearing of this cause Your Honor will grant unto your Orator an absolute divorce from the said Mary Williams.

That if your Orator is mistaken in the relief prayed for then your Honor will grant unto him such, other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.,


Henry D. Moorer,
Attorney for Complainant.

FOOT NOTE:

Defendant is required to answer every allegation contained in the foregoing bill, paragraph one to three, inclusive, but not under oath. Answer under oath is hereby expressly waived.


Henry D. Moorer,
Attorney for Complainant.