Leonard F Ezell,

Complainant

In The Circuit Court of Baldwin County,

Alabama.

Inez Ezell,

In Equity.

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Respondent.

To the Honorable F.W. Hare, Judge of the Twenty First Judicial Circuit of Alabama, which includes Baldwin County:

Humbly complaining, your Grator, Leonard F Ezell, respectfully represents unto your Honor as follows:

- 1. Your Orstor, Leonard F Ezell, and Inez Ezell were lawfully married in Monroe County, Alabama, on towit, December Soth, 1924 at Excell in said County. They lived together as man and wife until July 5th, 1925, when the said Inez Ezell abandoned your Crator and went to live with her father at Repton, Alabama and since said abandonment of your Orator the said Inez Ezell has remained away ever since and has not returned to live with your Orator. This abandonment was voluntary on the part of said Inez Ezell and was without any good cause or lawful excuse therefor.
- 2. Both your Crator and respondent are cont the age of twenty one years, your Orator will be twenty five years old in June ,1930 and respondent is now about 21 years of age; your "rator now residees at Foley, In Baldwin County, Alabama/andhave been a resident of Baldwin County, since February, 1929 and has been a bone fide resident of the State of Alabama all of his life and has been such resident of said state for three years next preceeding the filing of the Bill in this cause and longer. The respondent, Inez Ezell, is at present a resident of the state of Alabama and then last heard from . Was residing at Foshee in Escarbia County, Alabama .
- 3. During all the time your Grator, Leonard F Ezell, lived with respondent,-Inez Ezell, as her husband, your Crator was at all times and in every way a faithful and dutiful husband and gave her no cause whatever for complaint; Thile theywere living together at Excell respondent got diseatisfied and insisted on going to live with her father at Repton, Alabama. This your Grator permitted but after staying awhile at Repton hewent to Peterman, Alabama, to live and tried to get respondent to go there and live withhim, which she refused to do and thus, in July 1929, she did abandon your Crator at Repton as stated aforesaid in the first paragraph of this Bill of Complaint.

wherefore, the premisses considered, your Orator, Leonard F Ezell, prays a subpose abe issued and directed to the said Inez Ezell, respondent aforesaid, in this cause; that she be brought into this court and directed to answer the charges herein made against her under the rules of this Honorable Court; that she be made a party defendant or respondent to the said Bill of Complain and that upon a final hearing of the Evidence in this cause, your Honor wil order, adjudge and decree that the bonds of matrimony heretofore existing - between your Orator and the said Inez Ezell be forever dissolved and that your Orator be permitted to marry again and that he be granted such other and further relief as may in equity and good conscience seem proper and meet to your Honor.

And your Orator will ever pray etc.

Solicitor for Complainant.

Foot Note:

The respondent is required to answer each and every paragraph of the foregoin Bill from 1 to 5 inclusive, but her answer under oath is hereby expressly - waived.

Solicitor for Complainant .

The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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OFFICE OF

SHERIFF OF BALDWIN COUNTY

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May 20, 1930

Sheriff A. H. Brown Brewton, Ala.

Dear Sir;

I am enclosing you a summons to be served on Inez Ezell who is in your County.

Please get service on this party and make return on the Original as soon as possible.

Thanking you for your attention in this matter.

Yours very truly,

C. Irwin, Sheriff Baldwin County, Ala.

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