

Leonard F Ezell,

Complainant
vs

Inez Ezell,

Respondent.

In The Circuit Court of Baldwin County,
Alabama..

In Equity.

899

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

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

1. Your Orator, Leonard F Ezell, and Inez Ezell were lawfully married in Monroe County, Alabama, on to wit, December 20th, 1924 at Excell in said County. They lived together as man and wife until July 5th, 1925, when the said Inez Ezell abandoned your Orator 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 Orator and respondent are off 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 Orator now resides at Foley, in Baldwin County, Alabama, and have been a resident of Baldwin County, since February, 1929 and has been a bona 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 when last heard from was residing at Foshee in Escambia County, Alabama.

3. During all the time your Orator, Leonard F Ezell, lived with respondent, Inez Ezell, as her husband, your Orator was at all times and in every way a faithful and dutiful husband and gave her no cause whatever for complaint; While they were living together at Excell respondent got dissatisfied and insisted on going to live with her father at Repton, Alabama. This your Orator permitted but after staying awhile at Repton he went to Peterman, Alabama, to live and tried to get respondent to go there and live with him, which she refused to do and thus, in July 1929, she did abandon your Orator 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 subpoena be 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 will 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.

L. C. Jenkins

Solicitor for Complainant.

Foot Note:

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

L. C. Jenkins

Solicitor for Complainant.

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 Inez Ezell,

Foshee, Escambia County, Alabama,

of Escambia 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 Leonard F. Ezell,

against said Inez Ezell,

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 20th day of

May 1930, 193—

T. W. Richerson Register

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

Original

SERVE ON _____

Circuit Court of Baldwin County
In Equity

No. *899*

SUMMONS

Leonard F. Ezell,

vs.

Inez Ezell,

*Serve Copy on Inez Ezell
For her Execution
County Ala.*

Hon. S. C. Jenkins,

Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____ 19____

Sheriff.

Executed this _____ day of _____

19____

by leaving a copy of the within Summons with _____

Defendant

Sheriff

By _____

Deputy Sheriff.

Wherefore, the premisses considered, your Orator, Leonard F Ezell, prays a subpoena be 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 Complaint and that upon a final hearing of the evidence in this cause, your Honor will 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.

L. C. Jenkins
Solicitor for Complainant.

Foot Note:

The respondent is required to answer each and every paragraph of the foregoing Bill from 1 to 3 inclusive, but her answer under oath is hereby expressly - waived.

L. C. Jenkins
Solicitor for Complainant.

Original Bill

Leonard ~~H~~ Eggle
vs

Amey Eggle

RECORDED

Filed May 20th/1930

J. W. McNamee

Original

The State of Alabama, }
Baldwin County

Circuit Court of Baldwin County, In Equity

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against said Inez Ezell,

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 20th day of May 1930, 1930

T. W. Richerson Register

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

Copy

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Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Leonard E. Ezell,

vs.

Inez Ezell,

Hon. S. C. Jenkins,

Solicitor for Complainant

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____ 19____

Sheriff.

Executed this _____ day of _____

19____

by leaving a copy of the within Summons with _____

Defendant.

Sheriff.

By _____

Deputy Sheriff.

Recorded in Vol _____ Page _____

OFFICE OF
SHERIFF OF BALDWIN COUNTY

BAY MINETTE, ALA.

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

C. Irwin, Sheriff
Baldwin County, Ala.

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A. H. Brown

Yours truly,

Sheriff Irwin:
This party has not been at home in some time and can
not be found.