

935

The State of Alabama, } **Circuit Court of Baldwin County, In Equity**
Baldwin County

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Louise---Washington,

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 Hamilton Washington,

against said Louise Washington,

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 13th day of October, 1930

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. _____

SUMMONS

Hamilton Washington.

VS.

Louise Washington,

(Defendant)

W. W. Washington

John Chason.

Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____ 19____

Sheriff.

Executed this 14 day of

Oct 1930 19____

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By *J. W. Chason* Deputy Sheriff.

HAMILTON WASHINGTON

Complainant,

vs

LOUISE WASHINGTON,

Respondant.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA,
BALDWIN COUNTY.

TO THE HONORABLE THE CIRCUIT COURT-EQUITY SIDE,
STATE OF ALABAMA, BALDWIN COUNTY, AND THE HON.
F. W. HARE, JUDGE THEREOF, SITTING IN EQUITY:-

Comes your Complainant, Hamilton Washington, and exhibits this his Bill of Complaint for Divorce against the Respondant Louise Washington and shows unto this Court and unto your Honor as follows:-

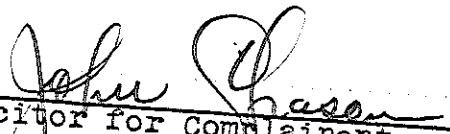
FIRST. That your Complainant and the Respondant are over the age of twenty-one years and are bona fide residents of the State of Alabama, the respondent residing at ~~Mobile~~ *Bay Minette*, Alabama and your Complainant residing at Stockton, Baldwin County, Alabama; that your Complainant has been such a resident of Baldwin County, Alabama, for more than three years next immediately preceeding the filing of this Bill of Complaint.

SECONDE That your Complainant and the respondent were married on heretofore, to-wit: October 27th., 1923 and lived together as man and wife until January 25th., 1926 at which time the respondent deserted and abandoned your Complainant without just cause or legal excuse.

THIRD. That a child was born of said respondent and your complainant and is now ~~almost~~ three years old, the said child being born about three months after respondent left your complainant; that your complainant has had the custody and control of said child since said child was about a year old; that your complainant is a fit and proper person to have the custody and control of said child while the respondent is not such a fit and proper person.

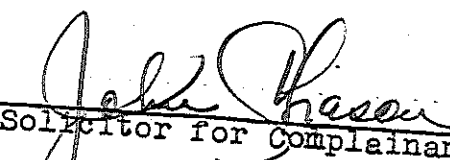
PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your Complainant prays that all necessary notices, orders and decrees be made and entered necessary to make the said Louise Washington party Defendant hereto, requiring her to appear and plead, answer or demur within the time required by law and under the pains and penalties prescribed by law and the rules of this court; that upon a final hearing of this cause that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between your Complainant and the respondent be forever dissolved; that your complainant be again permitted to contract the marriage relation should he so desire and that your Honor will further render, adjudge and decree that your Complainant is a fit and proper person to have the care, custody and control of said child and that he be allowed to keep the same and as in duty bound, he will ever pray, etc.


Solicitor for Complainant

FOOT NOTE:

The respondent Louise Washington is required to answer each and every paragraph of the foregoing Bill of Complaint from FIRST to THIRD, both inclusive, but answer under oath is hereby expressly waived.


Solicitor for Complainant.

Original

SERVE ON

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Hamilton Washington.

vs.

Louise Washington,

(Co-Defendant)

Plaintiff in the

John Chason.

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 _____

Oct 14 1936

by leaving a copy of the within Summons with

Defendant.

A. G. Driver

Sheriff.

J. H. Taylor

By Deputy Sheriff.

HAMILTON WASHINGTON

Complainant,

VS

LOUISE WASHINGTON,

Respondant.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA,

BALDWIN COUNTY.

TO THE HONORABLE THE CIRCUIT COURT-EQUITY SIDE,
STATE OF ALABAMA, BALDWIN COUNTY, AND THE HON.
F. W. HARE, JUDGE THEREOF, SITTING IN EQUITY:-

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FIRST. That your Complainant and the Respondant are over the age of twenty-one years and are bona fide residents of the State of Alabama, the respondent residing at ~~Mobile~~ *Bay Minette* Alabama and your Complainant residing at Stockton, Baldwin County, Alabama; that your Complainant has been such a resident of Baldwin County, Alabama, for more than three years next immediately preceeding the filing of this Bill of Complaint.

SECOND That your Complainant and the respondent were married on heretofore, to-wit: October 27th., 1925 and lived together as man and wife until January 25th., 1926 at which time the respondent deserted and abandoned your Complainant without just cause or legal excuse.

THIRD. That a child was born of said respondent and your complainant and is now ~~about~~ three years old, the said child being born about three months after respondent left your complainant; that your complainant has had the custody and control of said child since said child was about a year old; that your complainant is a fit and proper person to have the custody and control of said child while the respondent is not such a fit and proper person.

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John Chason
Solicitor for Complainant

FOOT NOTE:

The respondent Louise Washington is required to answer each and every paragraph of the foregoing Bill of Complaint from FIRST to THIRD, both inclusive, but answer under oath is hereby expressly waived.

John Chason
Solicitor for Complainant.