

1618

To the HONORABLE FRANCIS W. HARE,
JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
SITTING IN EQUITY:

Comes ANNA H. TENTHOFF, and by this her Bill of Complaint presented against EDWARD TENTHOFF, respectfully shows:

FIRST: That she is a resident of the County of Baldwin, State of Alabama and over the age of twenty-one years and has been a bona fide resident of said County for more than three years next prior to the filing of this bill. That Edward Tenthoff is also over the age of twenty-one years and up to the month of April 1931 had been a bona fide resident of Baldwin County, but in said month of April left his home for parts unknown and is now a non-resident of the State of Alabama.

SECOND: That Complainant and the said Edward Tenthoff were married in New York City on April 11th 1909 and lived there as husband and wife until the year 1922 when they removed to Elberta Alabama where they have since lived as man and wife until the separation hereinafter described.

THIRD: That at Elberta and during the last twelve months of their married life together the Defendant committed actual violence on the person of Complainant attended with danger to her life and health, among other manifestations of physical abuse striking her repeatedly and trying to kill her on four separate occasions in said period, the exact dates of which Complainant does not now recall. That on the last occasion which took place in the month of April 1931, after unsuccessfully trying to kill her, the Respondent broke up a large part of the furniture in the house in his rage and then left Elberta for parts unknown, since which time Complainant has neither seen nor heard from him or been able to ascertain his present whereabouts. Complainant further avers that even should Defendant return, she would be unwilling to again live with him, fearing from his past behavior and threats that he would do her serious bodily harm if not kill her.

THE PREMISES CONSIDERED; Complainant prays that the said Edward Tenthoff be made party defendant to this Bill of Complaint,

that he being a non-resident, an order of publication be made notifying him to appear and answer this bill within the time prescribed by law and to abide by such orders and decrees as may be made in the premises.

COMPLAINANT FURTHER PRAYS that upon proper proof of the averments of this bill a decree be rendered forever divorcing her from the said Edward Tenthoff, granting her the right to marry again should she so desire, and such other, further or different relief as to equity shall seem meet.

Elliott B. Rinehart
Solicitor for Complainant.

NOTE: The Defendant is required to answer each paragraph of the foregoing bill, but not under oath.

Elliott B. Rinehart
Solicitor for Complainant.

STATE OF NEW YORK.
COUNTY OF ~~QUEENS~~ ^{Kings}.

Before me, the undersigned Notary Public, personally appeared this day ANNA H. TENTHOFF who, being sworn, says that she is the complainant in the foregoing cause, that Edward Tenthoff the defendant therein named, is over the age of twenty-one years, that he left her in April, 1931; that his whereabouts are unknown, and that she has made diligent inquiry to ascertain his present address by inquiry of all parties whom she thought might know but without success, and as a result of such investigation now avers that said Edward Tenthoff is a non-resident of the State of Alabama, and that his present whereabouts are unknown to her.

Anna H. Tenthoff
Mrs. A. Tenthoff.

Subscribed and sworn to before me this the 17th day of December, 1931.

Quentin T. ...
Notary Public, ~~Queens~~ ^{Nassau} County, New York.

NOTARY PUBLIC
Cert. filed Nassau County
Kings Co. Clerk No. 87, Reg. No. 5326
Queens Co. Clk. No. 885, Reg. No. 8057
Commission Expires March 30, 1933

711 @ 37th St.
Brooklyn.

RECORDED

No.

THE STATE OF ALABAMA,

B A L D W I N County.

CIRCUIT COURT, IN EQUITY.

ANNA H. TENTHOFF,

Complainant.....

vs.

EDWARD TENTHOFF,
Defendant.....

ORIGINAL BILL.

Filed December 28th 1931.

W. Rickarey

Register.

ELLIOTT G. RICKAREY,
Solicitor.

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SECOND: That Complainant and the said Edward Tenthoff were married in New York City on April 11th 1909 and lived there as husband and wife until the year 1922 when they removed to Elberta Alabama where they have since lived as man and wife until the separation hereinafter described.

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Elliott S. Richerby,
Solicitor for Complainant.

NOTE: The Defendant is required to answer each paragraph of the foregoing bill, but not under oath.

Elliott S. Richerby,
Solicitor for Complainant.

[Faint handwritten notes and signatures are visible at the bottom of the page.]

Copy,

Anna H. Tenthoff.
compr.

vs.

Edwina Tenthoff.
deft.

Original Recd.

Filed December 28/31
T. W. Rice
Register

LAW OFFICES
ELLIOTT G. RICKARBY
ROBERTSDALE, ALA.

December 26th 1931

Thomas W. Richersenn, Esq.,
Register, Bay Minette, Ala.

Dear Sir:-

TENTHOFF vs TENTHOFF: With this I hand you bill of complaint in this cause which please file. The defendant is a non-resident and affidavit to this effect is attached to the bill and it also contains a prayer for order of publication which you, as Register and in the absence of the Judge can grant and send me copy for publication in this week's "TENSs-Herald" by return mail. For your convenience I have prepared this and enclose it. If it gets back here by Tuesday the date for the answer is all right, but otherwise it will have to be set for a week later. I am trying to get it set for the earliest possible date.

I hope that you had a pleasant Christmas. I spent mine here and it was the quietest that I have ever seen. There were almost no fireworks and I saw no one under the influence. Even the old professional soaks were sober-- perhaps they did not have the price.

I am also hoping that this may be the forerunner of a lot of other cases to be filed, thereby bringing ease to the troubled minds of clients and a modest compensation to a long-suffering Register and his

Sincere friend,

Elliott G. Rickarby