JOE HINOTE.

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Complainant.

-VS-

BERTHA HINOTE.

Respondent.

(1087)

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

ORIGINAL BILL OF COMPLAINT.

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

Comes your Complainant, Joe Hinote, and exhibits this his Bill of Complaint against the Respondent, Bertha Hinote, and for grounds thereof shows as follows:-

FIRST:

That your Complainant and the Respondent are of sound mind and over the age of twenty-one years; that both your Complainant and your Respondent are bona fide residents of the State of Alabama, the Complainant residing at Loxley, Alabama, and the Respondent residing at 700 Pillans Street, Mobile, Alabama; that they have been residents of this county for more than three years next preceding the filing of this Bill of Complaint.

SECOND:

That your Complainant and Respondent were married on heretofore, to-wit, the 14th day of November, 1929, and lived together as husband and wife until the Respondent, without just cause or legal excuse, voluntarily deserted and abandoned your Complainant on, to-wit, about the 2nd day of December, 1929; that such abandonment and desertion took place in Baldwin County, Alabama, and has continued without interruption for more than two years before the filing of this Bill of Complaint.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, Complainant prays that Respondent be made a party to this cause by the usual process of this Court.

That upon a final hearing hereof your Honor will render, adjudge and decree that the Bonds of matrimony heretofore existing between your Complainant and the Respondent be forever dis-

(page one)

solved and that your Complainant be again permitted to contract marriage should he so desire, and that there be granted such other or different relief to which your Complainant may be entitled in equity and good conscience. And as in duty bound your Complainant will ever pray, etc.

Soligitors for Completing to.

FOOT NOTE: -

The Respondent is required to answer each and every paragraph of the foregoing Bill of Complaint from "FIRST" to "SECOND", inclusive, but answer under oath is hereby expressly waived.

Solicitors for Complainant.

The State of Alabama, Baldwin County.

Circuit Court of Baldwin County, In Equity,

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# The State of Alabama, Baldwin County.

•	Baldwin County.  Circuit Court of Baldwin County, In Equity.
	To any Sheriff of the State of Alabama—GREETING:
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	700 Destination - Bertha Hinote,
E. T. Sagara	We COMMAND YOU, That you summon Pertha Hinote,  200 Pillans St, Mobile Ala.  Mobile,  County to be and appear before the Judge of the Circuit Court mons, and there to answer, plead or demur, without oath, to a Bill of Compleint lately exhibited by Joe Hinote,  Joe Hinote,  Sertha Hinote,  Gertha Hinote,
	Mobile,  Mobile,  County, to be and appear before the Judge of the Circuit Court and County, exercising Chancery jurisdiction, within thirty days after the service of Summs, and there to answer, plead or demur, without cath, to a Bill of Complaint lately exhibited by  JOE Hinote,  St. said  Bertha Hinote,
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Received payment this-

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Cost Bell to Aghant Heard + Charon for Pet 2/14,

Circuit Court, Baldwin County, Ala.
In Equity.

No. 1087

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# Cost Bill

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