

TO THE HON. FRANCIS W. HARE, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA, SITTING
IN EQUITY.

George W. WINBERG by this his bill of complaint
presented against ISABEL WINBERG respectfully shows:

FIRST: That he and the Defendant hereinafter named are
both over the age of twenty one years, natives of Baldwin County
and have been for more than two years next prior to this date bona
fide residents of Baldwin County, Alabama.

SECOND: That they were married in Bay Minette thirty six
years ago and have since lived together as husband and wife in
Fairhope except for a period of about ten years when Complainant's
business forced him to live in Texas, from which State he returned
more than two years ago.

THIRD: That there was born to said marriage a large
family of children, five of whom are under the age of sixteen years
and reside with their Mother in Fairhope, Complainant now living
separate and apart from his said wife for the past year.

FOURTH: That at various times since their marriage,
the said Isabel Winberg has been guilty of adultery with a man
residing in Fairhope but that such improper relations were not
definitely known to Complainant until about January 19th, 1933, when
Complainant's suspicions were confirmed.

FIFTH: That for more than a year Complainant and his
said wife have lived separate and apart and have no marital relations
whatsoever except that Complainant has supported his said wife and
family and expects to continue to do so.

THE PREMISES CONSIDERED, Complainant prays that Isabel
Winberg be made defendant to this cause and by proper notice given
to her be required to answer this bill within the time prescribed by
law.

Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing him from the said Isabel Winberg, granting him the right to marry again should he so desire and such other, further, and different relief as to Equity may seem meet.

Elliott G. Rinsbury
Solicitor for Complainant.

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

Elliott G. Rinsbury
Solicitor for Complainant.

and as such be required to answer same within the time prescribed by law.

Cross Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said George W. Winberg, granting her the right to marry again, the custody of the five younger children of the marriage, and such other, further or different relief as to Equity may seem meet.

Isabelle Winberg
Respondent and Cross Complainant.

NOTE: The Cross Respondent is required to answer each paragraph of the foregoing cross bill but not under oath.

Isabelle Winberg
Cross Complainant.

The State of Alabama, }
Baldwin County

GEORGE W. WINBERG,

Complainant.....

vs.

ISABEL WINBERG,

~~Defendant~~
Respondent.

CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

In Equity.

The Cross-Complainant

requests the oral examination of the following named witnesses, on behalf of the

Cross-Complainant

- viz:

Mrs. Isabel Winberg.

Elmer Winberg.

said witnesses reside in the County of Baldwin

State of Alabama.

Miss Bernice Folmer,

who resides at

Robertedale

or, The Register of this Court is suggested as a suitable person
to be appointed Commissioner to take the deposition of said witness on such oral examination.

Charles R. Hall
Solicitor for Cross-Complainant.

1097
eq.

CIRCUIT COURT OF
Baldwin County, Alabama

IN EQUITY

GEORGE W. WINBERG

Complainant.

vs.

ISABEL WINBERG

Respondent.

Defendant.

DEMAND FOR ORAL EXAMINATION

Filed May 1 1923

J. W. Richardson Register.

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

Isabel Winberg

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


George W. Winberg

against said

Isabel Winberg

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 27th day of January 1933.

 Register.

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

Original

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SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

George W. Winberg

vs.

Isabel Winberg

Elliott G. Rickarby.

Solicitor for Complainant

Recorded in Vol. Page

RECORDED
THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this 3rd day of

Feb 1923

by leaving a copy of the within Summons with

Isabel Winberg

Defendant.

Sheriff.

By

Deputy Sheriff.

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 GEORGE W. WINBERG

of BAIDWIN 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

CROSS

ISABEL WINBERG

against said GEORGE W. WINBERG

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

MARCH 192 33

T. W. Richerson Register.

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

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1097

SERVE ON

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

GEORGE W. WINBERG

vs.

ISABEL WINBERG

Solicitor for Complainant

Recorded in Vol.

Page

THE STATE OF ALABAMA,
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Received in office this

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Executed this

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192

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Defendant.

Sheriff.

By

Deputy Sheriff.

GEORGE W. WINBERG,

Complainant,

VS.

ISABEL WINBERG.

Respondent.

IN EQUITY

IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA.

Comes George W. Winberg, Cross-Respondent
in this cause and for answer to the Cross bill says;

FIRST: That he denies all the allegations
of the Cross bill other than the names, residence and
marriage of the parties.

Having thus answered, he prays that the said
Cross bill be dismissed.

William B. Rice

Solicitor for Complainant (and
Cross-Respondent.

GEORGE W. WINBERG

Complainant

VS.

ISABEL WINBERG,

Respondent.

ANSWER TO CROSS BILL

Filed April 24th 1933
T. M. Richmond
Register