

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

George W. WINBERG by this his bill of pomplaint 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.

THERD: 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.

Solicitor for Complainant.

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

> Eleit G. Rindaly. 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.

Asabelle Wonders
Respondent and Cross Complainant.

drabell allinberg

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

Cross Complainant.

GEORGE W. WINBERG,

Complainant.

VS

ISABEL W. WINBERG,

Respondent.

IN EQUITY.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

Comes ISABEL WINBERG, Respondent in the above entitled cause and for answer to the bill of complaint heretofore filed, says:

FIRST: She admits the allegations as to the names, ages, marriage and residence of the parties, and the number of children born to them.

SECOND: She denies all othermaterial allegations of the bill.

Having thus fully answered, she now prays that said bill be dismissed.

Respondent further prays that this, her answer, may be taken as a cross bill also, and in support thereof further avers:

are bona fide residents of Baldwin County, over the age of twenty one years, and were lawfully married, that on a number of occasions during their married life George W. Winberg has committed actual violence on her person attended with danger to life and health by striking her repeatedly; that the last act of violence occurred on or about the middle of January, 1932, shortly after which Cross Complainant left the said George W. Winberg and has since said time lived separate and apart from him in the Town of Fairhope without in any way having resumed marital relations. That her said husband is a man of violent temper, subject to fits of rage, in which he loses control of himself, that she has reasonable cause to believe that her life or health would be endangered should she continue to live with him.

THE PREMISES CONSIDERED, Cross Complainant prays that the said George W. Winberg be made party defendant to this cross bill

The State of Alabama, Baldwin County

GEORGE W. WINBERG,	
	CIRCUIT COURT OF BALDWIN
	COUNTY, ALABAMA
Complainant	
vs.	In Equity.
ISABEL WINBERG.	·
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CIRCUIT COURT OF Baldwin County, Alabama

IN EQUITY

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Moore Printing Co. :::: Bay Minette, Ala.

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	Isabel Winberg

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	Isabel Winberg
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The State of Alabama, Baldwin County.	Circuit Court of Baldwin County, In	ı Equity.
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N. B.—Any party defendant is	entitled to a copy of the bill upon application	to the negister.

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GEORGE W. WINBERG,

IN EQUITY

Complainant,

IN THE CIRCUIT COURT

VS.

OF

ISABEL WINBERG.

BALDWIN COUNTY, ALABAMA.

Respondent.

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.

Elever & Rindaly.

Solicitor for Complainant and

Cross-Respondent.

GEORGE W. WINBERG

Compla inant

VS.

ISABEL WINBERG,

Respondent.

Fried April 24 au 1933
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