

JIM GEE,
Complainant,
-vs-
VIRGINIA GEE,
Respondent.

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

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

Comes your Complainant, Jim Gee, and exhibits this, his Bill of Complaint for Divorce, against Virginia Gee, and shows unto your Honor and unto this Honorable Court, as follows:-

1st. That your Complainant and the Respondent are both over the age of twenty-one years, and are bona fide residents of Baldwin County, Alabama, residing at Bay Minette, and have been such residents for thirty-five years.

2nd. That your Complainant and Respondent were married on, heretofore, to-wit, in the year 1900, and have lived together as man and wife since that time, and until the Respondent abandoned your Complainant; that the said Respondent voluntarily abandoned the bed and board of your Complainant more than two years next preceding the filing of this Bill of Complaint, and that she has failed and refused to live with him since that time; that the Respondent abandoned your Complainant in April, 1934, and that they have not lived together as man and wife since that time; that your Complainant has been a resident of Bay Minette for more than three years next preceding the filing of this Bill of Complaint; that such abandonment by the Respondent was without just cause or legal excuse, and through no fault of your Complainant.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, your Complainant prays that the above named Respondent be made party defendant to this cause by the usual process of this Honorable Court, requiring her to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this court and the statutes in such cases made and provided; that upon a final hearing of this cause

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there be granted to your Complainant a divorce, and that your Complainant be granted the right to remarry, and should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, further and different relief to which he may be entitled, and as in duty bound he will ever pray.

Witness his marks

*John Chason
Mary J. Green.*

*Jim his
Gee
Complainant.*

FOOT NOTE:

Respondent is required to answer each and every paragraph of the foregoing Bill of Complaint, from "1st" to "2nd", inclusive, but answer under oath is hereby expressly waived.

Edward Chason
Solicitors for Complainant.

STATE OF ALABAMA,
BALDWIN COUNTY.

Before me, the undersigned authority in and for said State and County, personally appeared Jim Gee, who is known to me, and who, after being by me first duly and legally sworn, doth depose and say under oath as follows:

That he is the complainant in the aforesaid cause, and is over the age of twenty-one years; that he has read the foregoing Bill of Complaint and that the same is true in all respects.

Witness his marks
*John Chason
Mary J. Green*

*Jim his
Gee
marks*

Sworn to and subscribed before me, a Notary Public whose seal is hereto affixed, this 26th day of September, 1936.

Mary J. Green
Notary Public, Baldwin County,
State of Alabama.

JIM GEE,
Complainant,
VS.
VIRGINIA GEE,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

Comes the Respondent and for answer to the Complainant's Bill of Complaint and to each count and allegation thereof, separately and severally, says:

ONE:

That she denies each and every allegation contained therein not herein specifically admitted and demands strict proof of the same.

TWO:

That she admits that both the Complainant and Respondent are over twenty-one years of age and residents of Baldwin County, Alabama, residing at Bay Minette, and have been such residents for thirty-five years.

THREE:

That she admits that the Complainant and Respondent are husband and wife, having intermarried, to-wit, in the year 1898.

FOUR:

That she denies that she ever voluntarily abandoned the bed and board of the Complainant, or that she has failed and refused to live with him; that she denies that she abandoned the Complainant in April, 1934.

Respondent further shows that she is sixty-five years of age and has no money or property, nor any means of supporting herself or employing counsel to defend her in this matter.

WHEREFORE, the premises considered, your Respondent prays that your Honor will order a reference to determine a reasonable alimony pendente lite, ^{and permanent} to be paid to the Respondent by the Complainant and also a reasonable attorney's fee to be paid by the Complainant to the Respondent in defending this action, and give unto her such other or further relief as she may be entitled to in the premises.

Richard Lee Beebe
Solicitors for the Respondent.

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 **Virginia Gee**

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

Jim Gee

against said **Virginia Gee**

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, Robert S. Duck, Register of said Circuit Court, this **26th** day

of **Sept.** 193**6**

 Register

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

RECORDED
such as
6-502

Serve on Virginia Gee

Circuit Court of Baldwin County
IN EQUITY

THE STATE OF ALABAMA,

BALDWIN COUNTY

No. _____

SUMMONS

Received in office this _____

Allen

day of _____

Oct

, 193*5*

Jim Gee

SHERIFF

Executed this 10-2 day of _____

193*5*

by leaving a copy of the within Summons with

Virginia Gee

Defendant

M. H. Williams

Sheriff

By E. W. Anderson

Deputy Sheriff

Hybart & Chason.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED
Duck
6-504

ANSWER

JIM GEE,

Complainant,

VS.

VIRGINIA GEE,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

Filed Oct. 26, 1936

G. W. Duck, Registrar

there be granted to your complainant a divorce, and that your complainant be granted the right to custody, and that your complainant be restored in the relief prayer for, that there be granted to him such other, further and different relief to which he may be entitled, and so in duty bound he will ever pray.

BILL OF COMPLAINT.

*Specimens RECORDED
Book of Records
Ricks*

JIM GEE,

Complainant,

-VS-

VIRGINIA GEE,

Defendant.

IN THE CIRCUIT COURT-IN EQUITY

STATE OF ALABAMA

BALDWIN COUNTY.

Filed September 24, 1936

R. D. Ricks
Register.

before me, the undersigned authority in and for this State and County, a complaint was filed in and to me, and that, after being by me read and legally examined, both the case and the facts therein as follows:

That he is the complainant in the above case, and is over the age of twenty-one years; that he has been married to the defendant and that the same is true in all respects.

Witness my hand and seal of office this 24th day of September, 1936.