

1755

MARY E. SMITH

Complainant

-vs-

ROBERT SMITH

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes your Complainant, Mary E. Smith, and exhibits this, her Bill of Complaint for divorce against Robert Smith and shows unto your Honor and this Court as follows:-

FIRST:

That your Complainant is over the age of twenty-one years and is a bona fide resident of the State of Alabama, her present address being Foley, Alabama; that the Respondent is a resident of the State of Alabama and resides at Foley, Alabama, and that he is over the age of twenty-one years.

SECOND:

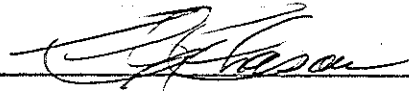
That your Complainant and the Respondent were married on, heretofore, to-wit, May 16, 1943, and lived together as man and wife until July 16, 1946, when because of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that the Respondent, on several occasions struck your Complainant with his fist and committed other actual violence on her person and endangered her life and health; that on several occasions he has threatened to kill your Complainant by striking her with an ax while she is asleep, which she believed that he intended to do; and that after marriage Respondent has become addicted to habitual drunkenness.

PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your Complainant prays that Robert Smith be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to 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 that your Complainant be granted a divorce from the said Respondent.

Should your Complaint be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled, and as in duty bound she will ever pray.



MARY H. SMITH

Complainant

-vs-

ROBERT SMITH

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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FIRST:

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SECOND:

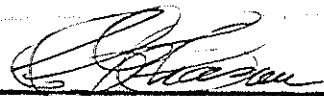
That your Complainant and the Respondent were married on, heretofore, to-wit, May 16, 1945, and lived together as man and wife until July 18, 1946, when because of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that the Respondent, on several occasions struck your Complainant with his fist and committed other actual violence on her person and endangered her life and health; that on several occasions he has threatened to kill your Complainant by striking her with an ax while she is asleep, which she believed that he intended to do; and that after marriage Respondent has become addicted to habitual drunkenness.

PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your Complainant prays that Robert Smith be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to 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 that your Complainant be granted a divorce from the said Respondent.

Should your Complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled, and as in duty bound she will ever pray.



FILED

NOV 9 1949

U. S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

1949
NOV 9 1949
U. S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NOV 9 1949

COMPLAINANT

VS

RESPONDENT

IN REPLY TO

DEED

RECEIVED

NOV 9 1949

MARY E. SMITH

Complainant

-vs-

ROBERT SMITH

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Come the Respondent in the above styled cause and as answer to the Bill of Complaint denies the allegations of the Complaint and each and every count thereof and demands strict proof thereof.

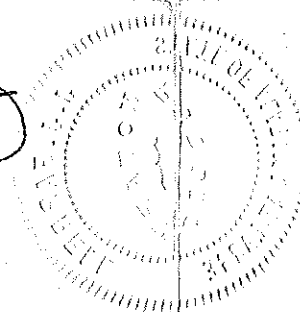
Respondent waives taking of testimony and notice of submission of said Cause. Respondent acknowledges service of Summons and Complaint.

Robert F. Smith

sworn to and subscribed before me,
Notary Public, on this, the 21st
day of November, 1946.

J. J. Farrell
Notary Public, Baldwin County,
State of Alabama.

1755



Filed

12-10-46

Alice J. Smith