

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF EALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes JAMES H. MASSEY, and humbly completning against ARLIE MASSEY, respectfully shows unto your Honor as follows:

FIRST:

That your complainant, James H. Massey, and the said Arlie Massey are both over the age of twenty-one years and reside in Haldwin County, Alabama; that they have resided continuously at Bay Minette, in Baldwin County, Alabama, for more than four years next preceding the filing of this bill of complaint.

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That your complainant, James H. Massey, and the said Arlie Massey, were married in Bay Minette, Baldwin County, Alabama, on May 14th, 1934, and lived together as husband and wife until October 15, 1936; that on or about September 27, 1936, and at other times the said Arlie Massey committed acts of adultery with men whose names are to your complainant unknown; that the said acts of adultery were without the consent or approval of your complainant, and that he has not condoned said acts.

Court will take jurisdiction of the cause made by this bill of complaint and by appropriate process make the said Arlie Massey party defendant hereto, and require her to plead, answer or demur to this bill of complaint within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of this bill of complaint your Honor will make and enter a decree forever dissolving the bonds of matrimony existing between your complainant and the said Arlie Massey.

Your complainant prays for such other, further and different relief as in equity and good conscience he shall be entitled to receive.

Bule Hall Houle,
Solietors for Completent.

FOOT MOUTE

The respondent is required to answer each and every allegation contained in this bill of complaint from Paragraphs FIRST to SECOND, inclusive, but not under each, each being hereby express-

ly waired.

Bello Hall + Bello

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 Arlie Massey Of Baldwin. County, exercising Châncery 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 b James H Massey against said Arlie Massey and further to do and perform what said Judge shall order and direct in that behall. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ why your endorsement thereon, to our said Court immediately upon the execution thereof. WITNESS, Robert S. Duck, Register of said Circuit Court, this 19th days of November. 193 6	Το Δ	nvs	herit	if of th	ie St	ate	of ∆	laha	ma-	_cF	शासाय	IN	G.			ŧ		1		
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N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

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

Comes JAMES H. MASSEY, and humbly complaining against ARLIE MASSEY, respectfully shows unto your Honor as follows:

FIRST:

That your complainant, James H. Massey, and the said Arlie Massey are both over the age of twenty-one years and reside in Baldwin County, Alabama; that they have resided continuously at Bay Minette, in Baldwin County, Alabama, for more than four years next preceding the filing of this bill of complaint.

SECOND:

That your complainant, James H. Massey, and the said Arlie Massey, were married in Bay Minette, Baldwin County, Alabama, on May 14th, 1934, and lived together as husband and wife until October 15, 1936; that on or about September 27, 1936, and at other times the said Arlie Massey committed acts of adultery with men whose names are to your complainant unknown; that the said acts of adultery were without the consent or approval of your complainant, and that he has not condoned said acts.

WHEREFORE, your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and by appropriate process make the said Arlie Massey party defendant hereto, and require her to plead, answer or demur to this bill of complaint within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of this bill of complaint your Honor will make and enter a decree forever dissolving the bonds of matrimony existing between your complainant and the said Arlie Massey.

Your complainant prays for such other, further and different relief as in equity and good conscience he shall be entitled to receive.

Seely Hall & Seele Solicitors for Complainant.

FOOT NOTE:

The respondent is required to answer each and every allegation contained in this bill of complaint from Paragraphs FIRST to SECOND, inclusive, but not under eath, eath being hereby expressly waived.

Scalle Half + Beek Solicitors for Complainant. Recorded in Vol. Circuit Court of Baldwin County
IN EQUITY Beebe Hall and Beebe Arlie Massey James H. Massey SUMMONS Solicitor for Complainant VS. 272

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THE STATE OF ALABAMA, BALDWIN COUNTY

Serve on -

Executed this. day of -Received in office his -SHERIFF day of

by leaving a copy of the within Summons with ar.

Defendant

Sheriff

Claudo Deputy Sheriff

FOOT NOTE:

The respondent is required to ensuer each and every allegation contained in this bill of complaint from Peregraphs First

to SECOND, inclusive, but not under oath, oath being hereby express-