

TO THE HON. F. W. HANE, 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 Oc-  
tober 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 com-  
plaint 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 dis-  
solving the bonds of matrimony existing between your complainant and  
the said Arlie Massey.

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

Beebe Wall + Beebe  
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 oath, oath being hereby expressly waived.

*[Handwritten signature]*

Beebe Hall + Beebe  
Solicitors for Complainant.

*[Handwritten signature]*  
69-113-1000-11

The State of Alabama, { Circuit Court of Baldwin County, In Equity  
Baldwin County }

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Archie Massey

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

James H Massey

against said Archie Massey

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 11 9th day of November. 1936



Register

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

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Beebe Hall + Beebe  
Solicitors for Complainant.

*Book*  
RECORDED  
6-5-37

Serve on \_\_\_\_\_

**Circuit Court of Baldwin County**  
IN EQUITY

No. 272

**SUMMONS**

James H. Massey

VS.

Arlie Massey

Beebe Hall and Beebe  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA,**

BALDWIN COUNTY

Received in office this

10th

day of

Nov

, 1937

*M. H. Williams*  
SHERIFF

Executed this

27

day of

Nov

1937

by leaving a copy of the within Summons with

*Arlie Massey*

Defendant

*M. H. Williams*

Sheriff

By *C. W. Anderson*

Deputy Sheriff

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ly waived.

Richard H. ...  
Solicitor for Complaint.

Filed June 9, 1936  
Ed. ...  
August

in Rear of  
Camp