

The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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

VELMA FEACHER,

Complainant,

VS.

MACK FEACHER,

Respondent.

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

Comes your Complainant, VELMA FEACHER, and humbly complaining against the Respondent, MACK FEACHER, respectfully represents and shows unto your Honor and this Honorable Court as follows:

- l. That your Complainant is over twenty-one years of age and a resident of Summerdale, in Baldwin County, Alabama, and has been for more than three years next preceding the filing of this Bill of Complaint; that the Respondent is over twenty-one years of age and a non-resident of the State of Alabama, his present address being: C/o C. W. Girdlestone, 202 Blount Building, Pensacola, Florida.
- 2. That the Complainant and the Respondent were married at Bratt, Florida, on to-wit, February 10th, 1933.
- 3. That they lived together as husband and wife, in Baldwin County, Alabama, until, on to-wit, November 5th, 1935, when the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.
- 4. That there was born to said marriage one child, a boy, named Jimmy Braddock Feacher, two years old; that said child has been with the Complainant, its mother, all its life; that the Complainant is willing, able and capable of caring for the said child.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said MACK FEACHER party respondent to this Eill of Complaint, requiring him to plead, answer or demur to the same 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 cause,

your Honor will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent, MACK FEACHER; that your Honor will make and enter an order and decree awarding to her the care, custody and control of said child, Jimmy Braddock Feacher; and that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Beeles of Complainant.

FOOT NOTE:

The Respondent, MACK FEACHER, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 4, inclusive, but not under oath, oath being hereby expressly waived.

Rechestracy Aude Solicitors for Complainant.

CHANCERY EXECUTION BILL OF COSTS

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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-MACK FEACHER 202 Blount Bldg., Pensecola, Fla. -- % C.W. Girdlestone,
f ######## 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 VELMA FEACHER MACK FEACHER against said 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. 22nd WITNESS, Robert S. Duck, Register of said Circuit Court, this day April _193<u>8</u> R. S. Duck

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

VELIM FRACIER.

Compleinant,

VS.

MACK PRACTER,

Respondent.

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

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- 2. That the Complainant and the Respondent were married at Bratt.
 Florida, on to-wit, February 10th, 1988.
- 5. That they lived together as husband and wife, in Baldwin County.
 Alabama, until, on to-wit, November 5th, 1985, when the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.
- 4. That there was born to said marriage one child, a boy, named Jimmy Braddock Peacher, two years old; that said child has been with the Complement, its mother, all its life; that the Complement is willing, able and capable of caring for the said child.

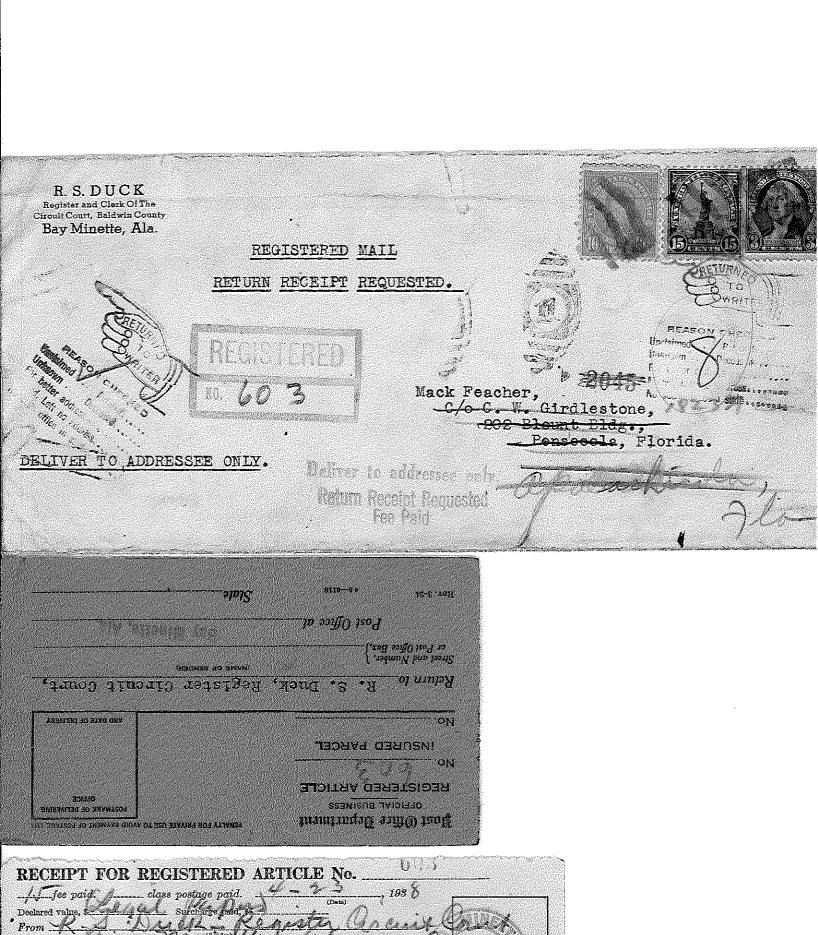
WILLIAM CORE, the premises considered, Complement prays that your Honor will, by proper process, make the said MACK FRACHER party respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same within the time and under the pomalties prescribed by law and the practice of this Bonorable Court.

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FOR BUILT

The Respondent, MACK FEACHER, is required to answer each and every allegation contained in the foregoing bill of Complaint, in paragraphs I to 4, inclusive, but not under oath, oath being hereby expressly vaived.



Special delivery fee_

Postmaster, per _ 14

Return receipt fee ...

Delivery restricted to addressee