

Chancery Case Number _____.

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REBECCA LAMBERT, *

Complainant. *

Vs. *

TILLMAN LAMBERT, *

Defendant. *

* * * * *

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, EQUITY SIDE, AND THE HONORABLE A. E. GAMBLE, JUDGE THEREOF, IN EQUITY SITTING.

Rebecca Lambert exhibits this, her Original Bill of Complaint for Divorce for Abandonment, ^{against} ~~from~~ Tillman Lambert, and respectfully represents and shows unto Your Honor and unto this Honorable Court:-

-FIRST-

That she is a "bona fide" resident of Baldwin County, State of Alabama, and has been for more than three years next immediately preceding the filing of this Bill of Complaint. That the Defendant, Tillman Lambert is also a "bona fide" resident of Baldwin County, State of Alabama. That they are both over the age of twenty-one years.

-SECOND-

That she and the said Tillman Lambert were married many years ago and that they lived together as man and wife until on about, to-wit, the 1st day of May, 1916, when the said Tillman Lambert voluntarily deserted and abandoned your Oratrix, without just cause or legal excuse. That said abandonment took place more than two years before the filing of this Bill of Complaint and they have not resided or lived together as man and wife since that time.

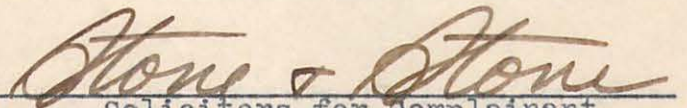
-PRAYER FOR PROCESS-

The premises considered, Oratrix prays that process be issued out of this Honorable Court, requiring the said Tillman Lambert to appear and plead, answer or demur to this Original Bill of Complaint with-

in the time required by law, under the pains and penalties of this Honorable Court.


-PRAYER FOR RELIEF-

Oratrix prays that upon a final hearing of this cause that Your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between Oratrix and the said Tillman Lambert be forever dissolved; that Oratrix be agains permitted to contract the marriage relation. And as in duty bound, she will ever pray, etc., etc.,


Solicitors for Complainant.

FOOT NOTE:-

The Defendant, Tillman Lambert, is required to answer each and every paragraph of the foregoing Bill of Complaint from "FIRST" to "SECOND", both inclusive, but not under oath, answer under oath being hereby expressly waived.


Solicitors for Complainant.

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ncs.

DELLA LAMBERT

In the Circuit Court - Equity Side

VS.

State of Alabama.

TILLMAN LAMBERT.

Baldwin County.

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I hereby accept service of process in above case this Sept 17th. Day of September 1918, and waive all further notice of proceedings in said case.

Witness my hand and seal this Sept. 17th. 1918.

Tillman Lambert

State of Alabama.

Baldwin County. I, W H Hawkins a Notary Public in and for said County and State hereby certify that Tillman Lambert whose name is signed to the foregoing instrument and who is known to me acknowledged before me on this day that being informed of the contents of the foregoing instrument he signed and executed the same voluntarily on the day the same bears date.

Witness my hand and seal this Sept. 17th. 1918

W H Hawkins
Notary Public Baldwin County Alabama.

