

Jesse May Davis, Complainant,)
vs)
Osie Davis, Respondent .)

In The Circuit Court of Baldwin
County, Alabama.
In Equity.

To The Honorable Francis W Hare, Judge of the Twenty First Judicial Cir-
cuit of Alabama, which includes Baldwin County:

Humbly complaining, Your Oratrix, Jesse May Davis, respectfully -
represents unto your Honor as follows:-

1. That your Oratrix, the said Jesse May Davis, and Osie Davis, the
repondent in said cause, were legally married, to towit, June 7th, 1929 in
Monroe County, Alabama and they lived together as husband and wife un-
til about four years ago, when they separated while they were living
at Perdido, Alabama, in Baldwin County and that they have not lived to-
gether since said time as husband and wife. Both your Oratrix and the
respondent are bona fide citizens of Baldwin County, Alabama and have
been so for more than three years prior to and preceeding the filing
of the Bill of Complaint in this cause; that they are both over the
age of twenty one years and both reside at Bay Minette, Alabama in the
said Baldwin County, Alabama.

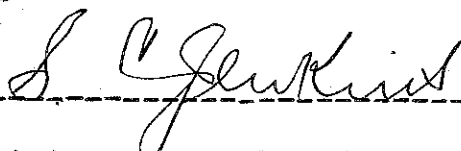
2. That after the marriage between your Oratrix and the respondent, the
respondent, the said Osie Davis, became addicted to drink and when he
got drunk or was drinking heavily, he would beat and treat your Oratrix
most cruelly: His conduct became such towards your Oratrix that she had
a reasonable apprehension of great personal violence and harm to her
such as would endanger her health and life and, as a consequence, Your
Oratrix was forced to leave the respondent, which she did about four
years ago and since said time she has not lived with him at all.

3. Your Oratrix shows further to your Honor that for more than two
years prior to and preceeding the filing of the Bill of Complaint in this
cause, the respondent, the said Osie Davis, has not contributed anything
at all towards the support and maintenance of your Oratrix either of
money, goods or supplies of any kind and even before she, the said
Jesse May Davis, left or separated with the respondent, the said Osie
Davis, ~~he~~ had failed to give her a support and, often, she had to leave
him and go to her father's home to get the actual necessaries for life.

Wherefore, the premises considered, your Oratrix, the said
Jesse May Davis, prays that a subpoena be issued and directed to the
said Osie Davis, the respondent in this cause; that he be brought into

-this Honorable Court; that he may be made a party defendant to the Bill of Complaint filed in this cause and that upon a final hearing of the - evidence in this cause and at a final hearing therein, your Honor will order, adjudge, and decree that the bonds of matrimony heretofore existing between your Oratrix and the respondent, the said Osie Davis, be forever dissolved and that your Honor will, also, order, adjudge, and decree that your Oratrix be permitted to marry again and that she be granted such other and further relief as may in equity and good conscience seem meet and proper to your Honor .

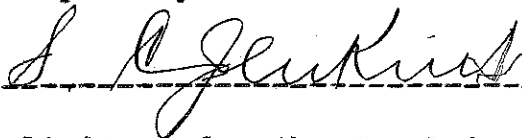
And Your Oratrix will ever pray etc.



Solicitor for the Complainant .

Foot Note :

The respondent is required to answer each and every paragraph of the - foregoing Bill of Complaint from item 1 to item 3 inclusive, but his answer under oath is hereby expressly waived .



Solicitor for the Complainant.

Jesse May Davis, Complainant)

vs

Osie Davis, Respondent .)

In The Circuit Court of Baldwin

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Now, comes Osie Davis, the respondent in the foregoing styled cause, and for answer to the complaint and to each paragraph thereof says:- that he is not guilty of the acts of cruelty therein alleged and he demands strict proof of the same and he denies that he did not support his wife, while he was living with her; he admits that he and the said Jesse May Davis were legally married in Monroe county, Alabama, on towit, June 7th, 1929 and that they separated about four years ago and that they have not lived together since said time as man and wife; he, also, admits that he is a bona fide resident citizen of Baldwin County, Alabama, residing at Bay Minette, Alabama and that he is over the age of twenty one years.

Respondent, the said Osie Davis, further answering, says, he waives - notice of a subpoena by sheriff to be served upon him in said cause and he waives notice of the time and place of the taking of testimony in the case or cause now pending in said Circuit Court of Baldwin County, Alabama either on the direct testimony of witnesses by oral evidence or upon depositions of of witnessesses taken in the cause and he consents that a decree may be taken in vacation and waives notice of the submission of the cause by the complainant or her attorney and Solicitor.

Signed this 30th day of August, 1938.

Osie Davis

Signed and executed in the presence of

J. Jenkins
W. H. Hawkins

as witnesses

Book 7-584-5

RECORDED
OSSIE DAVIS,
Complainant.

vs.

JESSIE MAE DAVIS,
Respondent.

Answer.

Filed Sept 18, 1935
R. S. DUOK

clerk, - register
By *Maudie Thompson*
Deputy

Recd
RECORDED 7-5-84

Miss Mrs Lewis

Compliments

no.

Miss Lane,

Respect

Bill & Cynthia

Recd August 25, 1938

H. S. Buck, Ryer