

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT,
IN EQUITY.

TO THE HONORABLE A. E. GAMBLE, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA---IN EQUITY.

Your Oratrix, Mary Lysek, respectfully represents
and shown unto your Honor as follows:

FIRST.

That she is a bona fide resident citizen of the
County of Baldwin and State of Alabama, residing at Summerdale,
Alabama, and that she is over the age of twenty-one years of
age.

That Andrew Lysek is over the age of twenty-one
years and is a resident of the State of Alabama, residing at
Summerdale, Alabama.

SECOND.

That your Oratrix and the said Andrew Lysek were
lawfully married about Fifteen years ago and lived together as
husband and wife until, to-wit: August 17th, 1919, at which time
they separated and since said time have not lived together as
husband and wife.

THIRD.

That on, to-wit: August 17th, 1919, the said Andrew
Lysek beat your Oratrix by striking her with a manure fork and
that prior to the said 17th day of August, the said Andrew Lysek
whipped your Oratrix on divers and sundry occasions, and the said
Andrew Lysek ^{threatened} to again beat, choke and cruelly treat your Oratrix.
That the said acts of violence committed on the 17th day of
August, 1919, on the person of your Oratrix were attended with
danger to her life or health, and from the conduct of the said
Andrew Lysek toward your Oratrix there is reasonable apprehension
of danger of life or health of your Oratrix.

FOURTH.

That your Oratrix is informed and beleives and on such information and beleif alleges and states the truth to be that the said Andrew Lysek is the owner of valudble property situated in Baldwin County, Alabama, consisting of eighty acres of land together with the improvements thereon, reasonably worth five thousand dollars (\$5,000.00).

That the said Andrew Lysek has approximately five hundred dollars (\$500.00) in the Bank at Robertsdale, Alabama, and that he also has about five hundred dollars (\$500.00) worth of liberty bonds in the said bank; that the said Andrew Lysek has on his farm, mentioned above valuable live stock worth approximately \$1000.00 Dollars.

That your Oratrix is the owner of no property at all, no income whatever and no means of support.

FIFTH.

That there was born to your Oratrix and the said Andrew Lysek ten children, one of which is now dead, leaving four girls and five boys and of the ages of to-wit: Between the ages of nine months and fourteen years of age. Your Oratrix further n shows unto this Honorable Court that the said Andrew Lysek is not a suitable and proper person to have the custody, control and rearing of the said minor children and that your Oratrix is a suitable and proper person to have the custody, control and rearing of the said children.

PRAYER FOR PROCESS.

The premises considered, your Oratrix respectfully prays this Honorable Court that the said Andrew Lysek be made a party respondent to this Bill of Complaint by the usual process of this Honorable Court and that he be required to demur, plead To or answer this Bill of Complaint under the pains and penalties of this Honorable Court and within the time required by the

rules of this Honorable Court, or that the same be forever confessed.

PRAYER FOR RELIEF.

That on the final hearing of this cause your Honor will make and enter an order and decree, granting unto your Oratrix an absolute divorce from the said Andrew Lysek.

That your Honor will make and enter a decree, allowing this Complainant alimony pendente lite, reasonable Attorneys' fees pendente lite, permanent Attorneys's fees and permanent alimony out of the estate of the said Andrew Lysek.

That your Honor will make and enter an order and decree, awarding the custody of the nine children, the said minors, to this Complainant.

That, if your Complainant is mistaken in the relief above prayed for that your Honor will grant unto her such other, further, different and general relief as in justice and equity she may be entitled to receive, under the allegations and proof, shw will ever pray, etc.

PAGE & MOORE,
Solicitors for Complainant.

FOOT NOTE: The Respondent is required to answer each and every allegation of the foregoing Bill of Complaint from FIRST to FIFTH, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORE,
Solicitors for Complainant.