

MATTHEW OWENS,  
Complainant.

-VS-

Rebecca Owens,  
Defendant.

IN THE CIRCUIT COURT-EQUITY SIDE.  
STATE OF ALABAMA.  
BALDWIN COUNTY.

No. 234

TO THE HONORABLE CIRCUIT COURT, EQUITY SIDE, AND THE HONORABLE JOHN D. LEIGH, JUDGE THEREOF, SITTING IN EQUITY:-

Comes your Complainant, Matthew Owen, and exhibits this his original bill for divorce against Rebecca Owens, on the ground of voluntary desertion and abandonment and respectfully represents and shows unto your honor and most this honorable court as follows:-

FIRST:-

That your complainant and the defendant are both over the age of twenty-one years; both are bona fide residents of the state of Alabama, the defendant residing in Camp Hugh, Alabama, and the Complainant residing in Baldwin County, Alabama, where he has resided continuously for notethan three years next immediately preceding the filing of this bill of complaint.

SECOND:-

That your complainant and the defendant were married on to-wit: during the month of August, 1909.

THIRD:-

That morethan two years before the filing of this bill of complaint the said defendant, Rebecca Owens, voluntarily deserted and abandoned, Complainant, without just cause or legal excuse and has continued to so abandon and desert Complainant, since that time, having refused on several occasions to return to him when so requested by complainant.

FOURTH:-

That there was born to complainant and defendant by said marriage one female child, namely, Pearly May; that said child is now about ten years old, and is in the custody of defendant. That said defendant is not a proper person to have the care, custody, or control of said child, nor is she able to properly support, care for, maintain and educate said child suitable to its condition in life.

That complainant is a proper and fit person to have the care, custody and control of said child; that he is willing to do so, that he has since the desertion by the defendant always supported said child.

PRAYER FOR PROCESS AND RELIEF.

The premises considered, complainant prays that such orders and decrees may be made and entered and such subpoenas issued directed to the said defendant, requiring her to appear and plead, answer or demur to this bill within the time required by law under the pains and penalties of this honorable court.

Upon a final hearing of this cause, complainant prays that your honor will render, adjudge, and decree that the complainant have and that he be given the custody and control of said child; that your honor will further render, adjudge and decree, that the bonds of matrimony heretofore existing between Matthew Owens, the complainant, and Rebecca Owens, the defendant, be forever dissolved and that your complainant be again permitted to contract the marriage relation if he so desires. And in duty bound, he will ever pray, etc., etc.,

*Stuart Stone*  
Solicitors for complainant.

FOOT NOTE:-

The Defendant, Rebecca Owens, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOURTH" both inclusive, but not under oath, answer under oath being hereby expressly waived.

*Stuart Stone*  
Solicitors for Complainant.

-----X  
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           Complainant.    ))        IN THE CIRCUIT COURT-EQUITY SIDE.  
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                           )  
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SECOND:-

That your complainant and the defendant were married on to-wit: during the month of August, 1909.

THIRD:-

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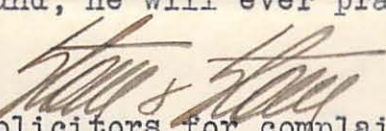
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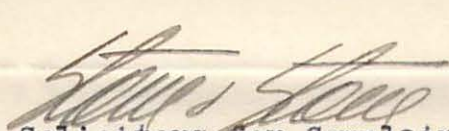
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Solicitors for complainant.

FOOT NOTE:-

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Solicitors for Complainant.