

ELIZA MARINO,
Complainant.

ROBERT J. MARINO,
Defendant.

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

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

Your Oratrix, Eliza Marino, files this, her original Bill of Com-
plaint for divorce from the bed and board of Robert J. Marino and for
maintenance and support and respectfully shows unto your Honor:-

-FIRST-

That she is over the age of twenty-one years and is a bona fide
resident of the County of Baldwin and State of Alabama, residing near
Daphne. That Robert J. Marino is also over the age of twenty-one years
is a resident of this county and state and resides near Daphne.

-SECOND-

That Your Oratrix and the said Robert J. Marino were married in
Baldwin County, Alabama, over thirty years ago. That of said marriage
there has been born several children, all of whom are now of age except
one male child named Percy who lives with your Oratrix.

-THIRD-

That for the past two years or more the defendant, Robert J. Ma-
rino has treated your Oratrix in a cruel and inhuman manner. That the
said Robert J. Marino does not treat her in a proper manner and as a
husband should treat a wife. He has repeatedly cursed, struck and
beaten her. For the past two years or more he has lived in adulter-
ous relations with other women. Most of his time is spent at the
houses of other women. He has nothing to do with your Oratrix when he
is at home other than to mistreat and abuse her.

-FOURTH-

That for the past two years or more he has continuously refused
and failed to provide her your Oratrix and the said minor child any
food or clothing.

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 Robert J. Marino,

of Baldwin County, 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

Eliza Marino,

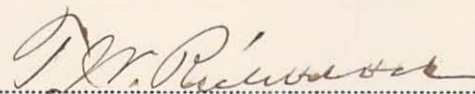
against said

Robert J Marino,

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.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 26th day of March,

1918.



Register.

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

2nd Original

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.....

SUMMONS.

Eliza Marino,

vs.

Robert J Marino,

Stone and Stoebe,

Solicitor for Complainant.

RECORDED

Recorded in Vol..... Page.....

Dept. lives near
Daphne.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this 26th

day of March 1919

O. B. Richerson

Sheriff.

Executed this 2d day of

April 1919

by leaving a copy of the within Summons with

Robert J Marino

Defendant

O. B. Richerson

Sheriff

By

Deputy Sheriff.

RUTH McCALL HARRELL, *
COMPLAINANT. *
-vs- *
CHARLIE HARRELL, *
DEFENDANT. *

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

No. _____

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

Your Complainant, Ruth McCall Harrell exhibits this, her original bill of complaint for divorce against the defendant, Charlie Harrell, and respectfully represents and shows unto your honor as follows:-

FIRST.

That the complainant is over the age of twenty one years, a bona fide resident of Bay Minette, Baldwin Countym Alabama, where she has lived for more than three years next immediately preceeding the filing of this bill; that the defendant is over the age of twenty one years, is a non-resident of the State of Alabama, and when last heard from resided somewhere in Mississippi, this was about seven years ago, since that time his address has not been known nor is it known now nor can complainant ascertain same after faithful and diligent ibquiry on her part.

SECOND.

That complainant and defendant were married heretofore on, towit; November, 1911, at Wallace, Alabama, and lived to-gether as man and wife until during the year, to-wit; 1912.

THIRD.

During the year, to-wit; 1912, more than two years next immed-iatley preceeding the filing of this bill of complaint, the defendant without just cause or legal excuse, voluntarily deserted and abandoned complaint. He has continued to so abandon and desert complainant and has never returned, or offered to return, since that time.

PRAYER FOR PROCESS.

The Premises considered, Complainant prays that such orders be made by this honorable court that will make the said Charlie Harrell party respondent to this bill, requiring him to appear, and plead,

answer or demur, within the time required by law, under the pains and penalties of this honorable court. And all other orders and decrees as may be necessary in the premises.

PRAYER FOR RELIEF.

Upon a final hearing of this cause, Complainant prays that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between the complainant, Ruth McCall Harrell, and the defendant, Charlie Harrell, be forever dissolved; that Complainant be again permitted to contract the marriage relation; that such other relief will be granted as complainant is entitled to in equity and good conscience and such as to your Honor will seem meet and proper. And, as in duty bound, she will ever pray, etc., etc.,

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SOLICITORS FOR COMPLAINANT.

FOOT NOTE. The defendant, Charlie Harrell, is required to answer each and every paragraph of the foregoing bill from "FIRST" to "THIRD", both inclusive, but not under oath, answer under oath being hereby expressly waived.

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SOLICITORS FOR COMPLAINANT.

NCS.

-----X
ELIZA MARINO,
Complainant.

-vs-

ROBERT J. MARINO.
Defendant.
-----X

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

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

Your Oratrix, Eliza Marino, files this, her original Bill of Com-
plaint for divorce from the bed and board of Robert J. Marino and for
maintenance and support and respectfully shows unto your Honor:-

-FIRST-

That she is over the age of twenty-one years and is a bona fide
resident of the County of Baldwin and State of Alabama, residing near
Daphne. That Robert J. Marino is also over the age of twenty-one years
is a resident of this county and state and resides Near Daphne.

-SECOND-

That Your Oratrix and the said Robert J. Marino were married in
Baldwin County, Alabama, over thirty years ago. That of said marriage
there has been born several children, all of whom are now of age except
one male child named Percy who lives with your Oratrix.

-THIRD-

That for the past two years or more the defendant, Robert J. Ma-
rino has treated your Oratrix in a cruel and inhuman manner. That the
said Robert J. Marino does not treat her in a proper manner and as a
husband should treat a wife. He has repeatedly cursed, struck and
beaten her. For the past two years or more he has lived in adulter-
ous relations with other women. Most of his time is spent at the
houses of other women. He has nothing to do with your Oratrix when he
is at home other than to mistreat and abuse her.

-FOURTH-

That for the past two years or more he has continuously refused
and failed to provide her, your Oratrix and the said minor child any
food or clothing.

-FIFTH-

That although the defendant is a man of moderate means, he is possessed of real and personal property to the value of about \$2,000.00. That he carries on farming operation successfully part of the year and at the other times he is employed by other people at good wages. That he is well able to support and care for your Oratrix and their said minor child in a manner suitable to their condition in life from these earnings. That the said Robert J. Marino is possessed of sufficient estate and his earnings are such as to enable him to pay your oratrix alimony pendente lite and to maintain and support Oratrix and their said minor child in a manner suitable to their condition in life.

PRAYER FOR PROCESS.

The Premises considered, Oratrix prays that Your Honor will caused to be issued out of this Honorable court a summons to the said Robert J. Marino, requiring him to appear and plead, answer or demur to this Bill of Complaint within the time required by law. That your Honor will order a reference to be held to ascertain the extent and value of the estate and earning capacity of the said Robert J. Marino; to ascertain what allowance will be proper for alimony pendente lite and attorneys fees for the bringing of this suit, as well as the amount proper for the maintenance and support of the minor child and your oratrix, and such other orders and decrees as are necessary and incident to the granting of the relief herein prayed.

PRAYER FOR RELIEF.

Oratrix prays that Your Honor will grant unto her an allowance as alimony pendente lite for her maintenance and support during the pendency of this cause and for the payment of her attorneys fees for the conducting of this suit. That upon a final hearing of this cause Oratrix prays that Your Honor will grant unto her a divorce from the Bed and Board (mensa et thora), but not an absolute divorce from the said Robert J. Marino. That your Honor will grant unto her the care custody and control of the said minor child. That your Honor will also grant unto her an allowance, consistent with the extent and value of the estate of the said Robert J. Marino and his earning capacity, and suitable to the condition in life of Your Oratrix and the said minor child, for the maintenance and support of Oratrix and the maintenance and support and education of the said minor child, and such other and further, further and different relief as she may in equity and good conscience be entitled and to your honor will seem meet and proper. And as in duty bound, she will ever pray, etc., etc.,

Stones Stone
SOLICITORS FOR COMPLAINANT

FOOT NOTE-

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

Stones Stone
SOLICITORS FOR COMPLAINANT