

TO THE HONORABLE ARTHUR E. GAMBLE, JUDGE OF THE CIR-
CUIT COURT OF BALDWIN COUNTY, ALABAMA: SITTING IN EQUITY.

Your Oratrix LUCY THOMPSON, brings this her bill of
complaint against BEN THOMPSON and humbly complains, represents
unto your honor as follows:

FIRST: That your Oratrix and the said BEN THOMPSON
are both over the age of twenty-one years and reside at Bay
Minette, Baldwin County, Alabama, that your Oratrix has resided
in said County and State for more than three years, continuously
next preceeding the filing of this her bill of complaint.

SECOND: Your Oratrix and the said defendant are hus-
band and wife having ^{intermarried} ~~entered marriage~~ at Bay Minette, Baldwin
County, Alabama in or about the year of 1904.

THIRD: The said defendant in or about the year 1913
voluntarily abandoned your Oratrix at Bay Minette, without fault
on her part, and your Oratrix and the said defendant have not
lived together as husband and wife at any time since said date.

FOURTH: That your Oratrix has without support from
him lived separate and apart from the bed and board of the said
defendant for five years next preceeding the filing of this bill
of complaint, and she has been a bona fide resident of this State
and County during all the said period.

FIFTH: That there was born of said marriage three
children as follows: Lee Arthur Thompson, a son, age twelve years,
Annie Laurie Thompson, age fourteen years, and Rosa Thompson,
age nine years; that each of said children are now in the custody
of the said defendant; that until a few weeks prior to this date
the said Annie Laurie Thompson and Rosa Thompson were in the cus-
tody of your Oratrix, when the said defendant took from her the
said Annie Laurie Thompson and Rosa Thompson.

Premises considered your Oratrix prays that Ben Thomp-
son be made a party defendant of this preceeding and by appropriate
process be required to plead, answer or demur to this bill of
complaint within the time and under the penalty prescribed by
law, and the practice of this honorable Court.

Oratrix further prays that an order of reference be made forthwith, directed to the Register with instructions to ascertain and report what sum would be suitable to be allowed Oratrix as alimony pendente lite, and what further sum would be right and proper for the payment of Oratrix' solicitors in this cause; that upon report being made as here prayed an order be made requiring the payment of such sum as the Court shall deem proper for such temporary alimony and counsel fees, that upon the hearing of the cause a decree be rendered granting to Oratrix an absolute divorce, awarding to her the care and custody of the children of said marriage, requiring the defendant to pay to her a suitable sum for the maintenance and support of herself and children and granting such other, further or different relief as to which she may be entitled in equity and to your Honor shall seem meet.

And Oratrix as in duty bound will ever pray, et cetera.

Richard Fizer & Burke
Solicitors for Complainant.

The defendant is required to answer each paragraph of the foregoing bill but oath to such answer is hereby waived.

Richard Fizer & Burke
Solicitors for Complainant.

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 Ben Thompson,

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

Luey Thompson,

against said

Ben Thompson,

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 15th, day of April

191 9.

T. W. Richerson

Register.

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

Original 2nd
copy
Serve on Ben Thompson
Bay Minette Ala

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No. 172

SUMMONS.

Lucy Thompson

vs.

Ben Thompson

Bay Minette, Ala.

Rickarby Austill and Beere.

Solicitor for Complainant.

Recorded in Vol. Page.

RECORDED

works for price

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this 15th

day of April, 1919

O B Richerson

Sheriff.

Executed this 16 day of

May 1919

by leaving a copy of the within Summons with

Ben Thompson

Defendant

O B Richerson

Sheriff

By

Deputy Sheriff.

