

State of Alabama,)
Baldwin County.)

IN THE CIRCUIT COURT,
IN EQUITY.

325

TO THE HONORABLE J.D. LEIGH, JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY,
ALABAMA,-----IN EQUITY.

Your Orator, Thomas Robinson, respectfully represents and shows
unto Your Honor as follows:

FIRST.

That he is a bona fide resident citizen of the County of Baldwin
and State of Alabama, residing at Robertsdale, Alabama. That he has been
a resident of the State of Alabama for a period of more than the last
three preceeding years next before the filing of this bill, and that
he is over the age of twenty one years.

That Annie Robinson is over the age of twenty one years and is a
resident of the State of Alabama, residing at Loxley, Baldwin County, Ala-
bama.

SECOND.

That Your Orator and Annie Robinson were married in Baldwin County
about the year nineteen hundred and fifteen; that your Orator and the
said Annie Robinson lived together as man and wife for about three years
and that the said Annie Robinson then voluntarily abandoned ^{the bed & board of} your Orator
more than two years ago and has not lived with him since.

PRAYER FOR PROCESS

The premises considered, your Orator respectfully prays that the
said Annie Robinson be made party respondent to this bill of Complaint
by the usual process of this honorable court, and that she be required
to demur, plead to, or answer the same within the time ^{allowed by law} and under the
penalties as provided by law, or that the same be forever confessed,
and will make all necessary orders and decrees to grant the relief
prayed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your Honor will grant
unto Orator an absolute divorce from the said Annie Robinson, and will
grant unto Orator the right to again contract marriage,

That if your Orator is mistaken in the relief prayed for,

Your Honor will grant unto him such other, fuyher, different,
and general relief as he may in justice and equity be entitled,
he will ever pray, etc.

P A G E A A N D M O O R E R .

Solicitors for Complainant

FOOT NOTE:

The defendant Annie Robinson, is required to answer each
and every allegation of the foregoing bill of complaint, numbered
from FIRST to SECOND, both inclusive, but not under oath, answer
under oath being hereby expressly waived.

P A G E A N D M O O R E R .

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 Annie Robinson,

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

Thomas Robinson,

against said

Annie Robinson,

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 25th, day of November,

192 1*

T. W. Richerson

Register.

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

Original

Serve on -----

Circuit Court of Baldwin County
In Equity

No. -----

SUMMONS

Thomas Robinson,

vs.

Annie Robinson,

Lesley Ala
Coast of Lesley Smith
on the Pendacole Roof
Page and Moorer.

Solicitor for Complainant

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

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this *25th* day of *November*, 192*1*

Sheriff

Executed this *26th* day of *Oct* 192*1*

by leaving a copy of the within summons with

Annie Robinson

Defendant

W. R. Stuart

Sheriff

By *B. A. Higgins*

Deputy Sheriff