

-----X
HILLIARD SMELLEY,)
Complainant.)
-vs-)
LAURA SMELLEY,)
Defendant.)
-----X

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

No. 259

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

Comes your Complainant, Hilliard Smelley and exhibits this his original bill for divorce against Laura Smelly on the ground of voluntary desertion and abandonment and respectfully represents and shows unto your honor and unto 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 Duncansville, Tuscaloosa County, Alabama, and complainant residing in Baldwin County, Alabama, having resided in said State for more than three years next immediately preceeding the filing of this bill of complaint.

SECOND:-

That your complainant and the defendant were married on to-wit; February 21st, 1917, and lived to-gether as man and wife until to-wit; October 8th., 1917, more than two years before the filing of this bill.

THIRD:-

That on to-wit; October 8th., 1917, the said defendant Laura Smelley voluntarily deserted and abandoned your complainant, without just cause or legal excuse, and has continued to so abandonand desert complainant since than time, having refused on several occasions to return to him when so requested by complainant.

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 bonds of matrimony heretofore existing between Hilliard Smelley, the complainant, and Laura Smelley, the defendant, be forever dissolved and that your complainant be again permitted to contract the marriage relation if he so desires. And as in duty bound, he will ever pray, etc., etc.,

Staus & Staus
Solicitors for Complainant.

FOOT NOTE:-

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

Staus & Staus
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 Laura Smelley

of Tuscaloosa, 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

Hilliard Smelley

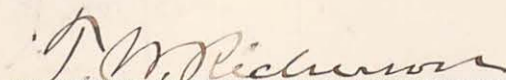
against said

Laura Smelley

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 12th day of April

1920. 191



Register.

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

Copy.

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.....

SUMMONS.

Hilliard Smelley

vs.

Laura Smelley.

Page and Moorer.

Solicitor for Complainant.

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

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this.....

day of 191.....

Sheriff.

Executed this..... day of

191.....

by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

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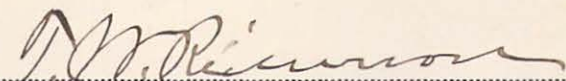
against said

Laura Smelley

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 12th day of April

1920. 191.....



Register.

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

2nd Original

Copy. *Laura Smelley, Tallapoosa*

area

Serve on *Laura Smelley, Tallapoosa*, THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.

SUMMONS.

Hilliard Smelley

vs.

Laura Smelley.

Stone Stone

Solicitor for Complainant.

Recorded in Vol. Page

Received in office this

day of 191.....

Sheriff.

Executed this day of

191.....

by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff.

*Please give better
address. State if
white or Col
where she works
or who she stays
with*

Perry B. Hughes
RECORDED
Sheriff