

2. That the said James Jones is an able bodied man capable of supporting the said Callie Jones, his wife, and that he has failed to do so and spends all his time and money with other women; that the said James Jones is now earning a good salary and should be required to support his said wife and to give her support suitable to his condition and station in life.

PRAYER FOR RELIEF.

The premises considered, respondent prays that this be taken as her cross-bill and answer to the original bill filed in this cause, and that such orders and decrees be issued as will make the said James Jones party respondent to this cross-bill; that subpoenas issue in the regular and usual manner of this Honorable Court and that the said James Jones be required to answer, plead to or demur to this cross bill as provided by law or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your Honor will enter a decree, allowing this respondent alimony pendente lite, reasonable attorneys fee pendente lite, permanent alimony and attorneys fees out of the estate of the said James Jones.

That if your respondent is mistaken in the relief prayed then your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled.

PAGE & MOORER,
Solicitors for Respondent.

FOOT NOTE: The respondent, James Jones is required to answer each and every allegation contained in the foregoing bill of complaint from 1 to 2, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORER,
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 James Jones

of Baldwin County, to be and appear before the Judge of the Circuit Court of Bald-

win County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer,

Cross-

plead or demur, without oath, to a Bill of Complaint lately exhibited by

Callie Jones

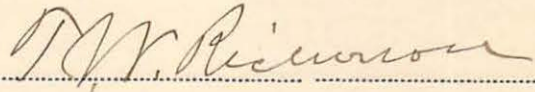
against said

James Jones,

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 27th day of Oct

1920



Register.

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

400 Original

Serve on -----

Circuit Court of Baldwin County
In Equity

No. -----

SUMMONS

James Jones

vs.

James Jones
Negro
Husband

RECORDED

Solicitor for Complainant

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

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this -----
day of ----- 192-----

Sheriff

Executed this *16th* day of
November 192*0*

by leaving a copy of the within summons with

James Jones
Defendant

W R Stewart
Sheriff

By *Perk Adams*
Deputy Sheriff

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 Callie Jones,

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

James Jones,

against said

Callie Jones,

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 17th, day of September

1920.



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

~~Callie Jones~~

James Jones,

vs.

Callie Jones,

Mar Hurricane

RECORDED

W.H. Hawkins,

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this 17th

day of August, 1920.

W.R. Stewart

Sheriff

Executed this 24th day of

September 1920

by leaving a copy of the within summons with

Callie Jones

Defendant

W.R. Stewart

Sheriff

By _____

Deputy Sheriff

RECORDED

James Jones,
Complainant.

In the Circuit Court of Baldwin County,
In Equity.

vs.

Callie Jones, Defendant

Comes James Jones, the complainant and cross-respondent in the above styled cause, and as answer to the cross-bill, alleges and states:-

First.

In answer to paragraph one of cross-bill, he says, that it is not true that he voluntarily left the said Callie Jones and has been living with another woman, since the separation, but that on the other hand since the separation on May 11, 1916, he has always been true to his marital vows, but that he has learned since the separation that the said Callie Jones has committed adultery with several men.

Two.

In answer to paragraph Two of the cross-bill, he says, that it is not true that he spends all his time and money with other women, and he denies that he has any property or money out of which to pay alimony. He also denies that the said Callie Jones ever signified her desire to live with him as his wife, but told him that she would have nothing more to do with him.

W. H. Hawkins

Solicitor for ~~cross-complainant~~ Cross.respondent, James Jones.

THE STATE OF ALABAMA,

Baldwin County.

James Jones

vs.

No.

Callie Jones.

CIRCUIT COURT, IN EQUITY.

To the Hon. John D. Leigh, Judge of the Circuit Court of Baldwin County, State of Alabama:

THE BILL OF COMPLAINT of James Jones

exhibited in the Baldwin Circuit Court against Callie Jones

humbly complaining, your orator shows your Honor as follows:

That your orator and Callie Jones are both over the age of 21 years.

That the said Callie Jones resides at Hurricane, Baldwin County, Alabama. That your orator has been a bona fide resident of the State of Alabama for more than ten years next before the filing of the bill of complaint in this cause. That your orator and Callie Jones were married at Hurricane, Baldwin County, Alabama, on to-wit:- May 30, 1910.

That on or about May 11th., 1916, the said Callie Jones voluntarily abandoned the bed and board of your oratrix, and refused to live with your orator as his wife. That said voluntary abandonment was in no way caused by your orator, but was wholly the fault of the said Callie Jones. That since the said May 11th., 1916, she has failed and refused to live with your orator as his wife.

Your orator now resides at or near Hurricane, Baldwin County, Alabama,

WHEREFORE, Your said orator prays that a Writ of Subpoena may issue to said

Callie Jones commanding her to appear and

answer this Bill of Complaint; that she be made a party

Defendant hereto, and that your Honor will make a decree annulling said marriage, granting your orator a

divorce, and permitting him to again marry, and as in duty bound he will ever pray.

W. H. Hawkins Solicitors for Complainant.

NOTE.—The Defendant is required, but not under oath, to answer the above Bill.

W. H. Hawkins Solicitors for Complainant.

No. Page

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

.....Plaintiff.....

vs.

.....Defendant.....

BILL OF COMPLAINT.

Filed 19.....

.....Register.

.....Plaintiff's Attorney.

.....Defendant's Attorney.