(263)

JAMES JONES,
COMPLAINANT.

VS
CALLIE JONES,
DEFENDANT.

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.
In Equity.

Comes the respondent, Callie Jones, by her Attorneys Page & Moorer and for answer to the original bill files this her answer and cross-bill in the above styled cause.

The respondent admits that she is over the age of twenty-one years and resides at Hurricane, Baldwin County, Alabama, and admits that James Jones is over twenty-one years of age and reside at Hurricane in said County and State.

The respondent further admits that the said James Jones and herself, Callie Jones were married at Hurricane, Paldwin County, Alabama on or about May 30th, 1910.

James Jones as alleged in his said bill for divorce and state the truth to be: That the said James Jones left the home where they were living without inviting her to go and took up with another woman whom he has been living with since the said separation. That your respondent is willing to live with the said James Hones, provided he will live with her and let the other woman alone.

The respondent except as hereinbefore specifically admitted, denied or qualified, denies each and every allegation of the Complainants bill of complaint.

CROSS * BILL.

The respondent, Callie James brings this her cross bill ans respectfully shows unto the Court as follows:

That she and the said James Jones were lawfukly married on or about the 30th day of May, 1910, and lived together as man and wife until, to-wit: May 11th, 1916 at which time the said James Jones voluntarily left the said Callie Jones and has been living with another man since the said separation.

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 ames 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, respondnt 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, Solicities for Respondent.

FOOT NOTE: The respondent, James Jones is required to answer each and every allegation conatined in the foregoing bill of complaint from 1 to 2, both inclusive, but not under oath, answer under oath being herebt 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
ofCounty, to be and appear before the Judge of the Circuit Court of Bald-
of Baldwin county, to answer,
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
M. Ricurron
Register.

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

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THE STATE OF ALABAMA BALDWIN COUNTY

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THE STATE OF ALABAMA, BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:	lie Jones
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of Baldwin County, to be	and appear before the Judge of the Circuit Court of Bald-
win County, exercising Chancery jurisdiction, within thirt	y days after the service of Summons, and there to answer,
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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	r command that you return this writ with your endorsement
thereon, to our said Court immediately upon the execution	dieleo1.
WITNESS, T. W. Richerson, Register of said Circui-	t Court, this 17th, day of September
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N. B .- Any party defendant is entitled to a copy of the bill upon application to the Register.

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THE STATE OF ALABAMA BALDWIN COUNTY

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James Jones, Complainant.

In the Gircuit 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:-

In answer to paragraph one of cross-bill, he says, that it is not true that he voluntarily left the said Callie ones 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.

First.

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 ones ever signified her desire to live with him as his wife, but told him that she would have nothing more to do with him.

THE STATE OF ALABAMA,
Baldwin County.
James Jones vs.
No
Callie Jones.
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 orat Or 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, Faldwin County, Ala-
bama. 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 re-
fused to live with your orator as his wife.
Your orator now resides at or near Hurricane, Baldwin County, Alabama,
WHEREFORE, Your said orat.Orprays that a Writ of Subpoena may issue to said
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 orat.Q.Ta
divorce, and permitting him to again marry, and as in duty bound will ever pray.
Solicitors for Complainant.
NOTE The Defendant is a single but at a day of the state
NOTE.—The Defendant is required, but not under oath, to answer the above Bill.
Solicitors for Complatuant.

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THE STATE OF ALABAMA,
county.
CIRCUIT COURT, IN EQUITY.
Plaintiff vs.
Defendant
BILL OF COMPLAINT.
Filed
Register.
Plaintiff's Attorney.
Defendant's Attorney.