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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:

WE COMMAND YOU, That you summon Cornelia Moore,

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

Will Moore,

against said

Cornelia Moore,

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 24th day of September

1929.



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

Will Moore,

vs.

Cornelia Moore,

*Residence of*  
*Cornelia Moore*  
*Near Gatewood*

Stone and Stone,

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

Received in office this \_\_\_\_\_

day of \_\_\_\_\_ 192\_\_\_\_\_

Sheriff

Executed this 23 day of

January 1921

by leaving a copy of the within summons with

*Cornelia Moore*

Defendant

*W R Stewart*

Sheriff

By \_\_\_\_\_

Deputy Sheriff

RECORDED

-----X  
WILL MOORE,  
Complainant. )  
-vs- )  
CORNELIA MOORE,  
Defendant. )  
-----X

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

No. \_\_\_\_\_

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

Comes your complainant, Will Moore, and respectfully exhibits this his original bill for divorce against Cornelia Moore on the ground of adultery and shows unto your Honor and unto this Honorable Court as follows:

"FIRST."

That both your complainant and the defendant are over the age of twenty-one years and are bona fide residents of Baldwin County, Alabama, where the defendant and the complainant have lived for more than one year next immediately preceeding the filing of this bill of complaint.

"SECOND."

That the complainant and the defendant were married about eight years ago at Bay Minette, Alabama and lived together as man and wife until about thirteen months ago.

"THIRD."

That about thirteen months ago the complainant was compelled to leave defendant on account of her adulterous intercourse with other men. That after the marriage of the complainant and the defendant the defendant became a lewd and immoral woman and on several occasions did commit adultery with one Jim Dredden, one Cleve Johnson and one Jim Johnson; that on each occasion complainant forgave the defendant upon a promise by her to him that she would refrain from such acts. That about the month of, to-wit; August, 1919, and at the time complainant left the defendant as above referred to, the defendant did commit adultery with one Howell, whose name is otherwise unknown to complainant; that defendant did also commit adultery with other persons whose names are unknown to complainant. That complainant did not connive at nor has he ever condoned or forgiven these last acts of adultery above set out.

PRAYER FOR PROCESS.

The Premises considered, complainant prays that your Honor will cause to be issued such orders, decrees and subpoenas as are necessary to make the said defendant party respondent to this casue, requiring her to appear and plead, answer or demur to this bill of complaint within the time required by law, under the pains and penalties of this honorable court.

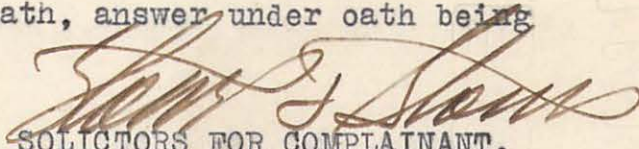
PRAYER FOR RELIEF.

That upon a final hearing of this bill that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between the complainant and the defendant be forever dissolved and that the complainant be against permitted to contract the marriage relation if he so desires. And, as in duty bound, he will ever pray, etc.,

  
SOLICITORS FOR COMPLAINANT.

FOOT NOTE:-

The defendant, Cornelia Moore, 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.

  
SOLICITORS FOR COMPLAINANT.