

292

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 Pearl Mc Reynold

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

Abraham Mc Reynold,

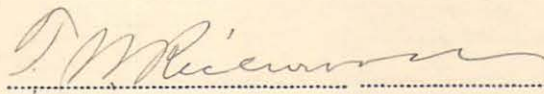
against said

Pearl Mc Reynold,

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 26th, day of January,

1921.



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. 292

SUMMONS

Abraham Mc Reynold,

vs.

Pearl Mc Reynold,

S.C. Jenkins,

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this
day of 192

Sheriff

Executed this 12th day of
February 1921

by leaving a copy of the within summons with

Pearl Mc Reynold

Defendant

WR Stewart

Sheriff

By
Deputy Sheriff

Abraham McReynolds, Complainant

In Circuit Court of Baldwin County.

vs

In Equity.

Pearl Mc Reynolds, Defendant

To Honorable John D. Leigh, Judge of the Circuit Court of Baldwin County :

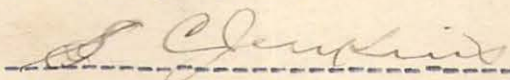
1st. Your orator respectfully represents that he is a resident of Baldwin County, Alabama and has been for more than three years next preceeding the filing of this Bill and that he is over twenty one years of age and that pearl Mc Reynolds, the respondent in this cause is a resident of Baldwin County, Alabama and is over twenty one years of age.

2nd That on towit, January 25th, 1916, more than four years ago and not more than five years, he and pearl McReynolds were lawfully married as man and wife, near Bay Minette in Baldwin County, Alabama, and they lived together as man and wife for three years near said place of Bay Minette, Alabama, in Baldwin County, ^{and} until about towit January, 1919.

3rd. That, on towit January 1st, 1919, more than two years ago, the said Pearl McReynolds voluntarily abandoned your orator's bed and board and that since that time, she has remained away voluntarily and continuously; that the said pearl Mc Reynolds without lawful excuse voluntarily abandoned ^{their} ~~at~~ or near Bay Minette, Alabama more than two years before ^{filing of} the Bill in this cause, on towit January 1st, 1921 and since said abandonment they have not lived together.

4th. That since the said marriage the respondent, pearl McReynolds has become a leud and immoral woman, and that without the consent or knowledge of your orator she has committed adultery with one, Will McCall and with divers persons whose names are unknown to your orator.

Whereas considered, your orator prays that a summons be issued directed to the said pearl McReynolds, requiring her to appear, answer or demur to your orator's Bill of Complaint within the time required by law; and that upon final hearing of said bill of complaint, your Honor will grant your orator a decree of absolute divorce from the said pearl McReynolds and that such other and further relief may be granted to your orator as your Honor may deem proper.



Solicitor of Complainant.

Foot Note.

The defendant or respondent, Pearl Mc Reynolds, is required to answer the averments of the foregoing Bill of Complaint contained in paragraphs one to four inclusive thereof, but not under oath, her answer under oath is hereby expressly waived.

[Handwritten signature]

Solicitor of Complainant.

[Faint handwritten notes]

MILLER MILL
BOND

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 Pearl Mc Reynolds

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

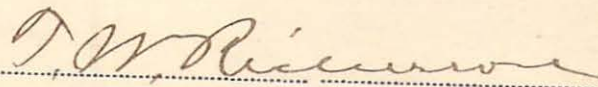
Abraham Mc Reynolds,

against said

Pearl Mc Reynolds,

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 26th, day of January,
1921.



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

Abraham Mc Reynolds.

vs.

Pearl Mc Reynolds.

S. C. Jenkins,

Solicitor for Complainant

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

RECORDED

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this -----

day of ----- 192

Sheriff

Executed this *14th* day of

February 192*1*

by leaving a copy of the within summons with

Pearl M. Reynolds
(*col*)

Defendant

W. R. Stuart

Sheriff

By -----

Deputy Sheriff

Abraham McReynolds,)
Complainant.)
vs)
Pearl McReynolds,)
Defendant.)

IN THE CIRCUIT COURT,

BALDWIN COUNTY, ALA.

Comes Pearl McReynolds, the Defendant, in this cause and for answer denies each and every allegation of the bill of complaint and demands strict proof of same. She ~~wishes~~ service by the sheriff of subpoena on said bill, notice of the filing of interrogatories, or any proceeding to take the testimony on oral examination as well as the right to cross examine, and consents that this cause be submitted for decree on note of testimony made by the Register either in term time or vacation.

Dated this 26 day of February, 1921.

Witnesses:

Mary Brown
T. W. Brown

Pearl McReynolds
made