

330

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 Robert Devine,

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

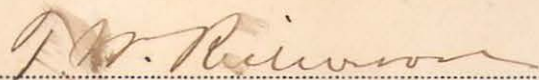
Lula Devine,

against said Robert Devine,

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 3rd, day of Dec 1921.

191.....



Register.

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

2nd Request

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.....

SUMMONS.

Lena Devine

vs.

Robert Devine

RECORDED

J. T. Moore
Solicitor for Complainant.

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

*Serve Copy on Robert
Devine, Robertsdale
Ala*

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this.....

day of 191.....

Sheriff.

Executed this *26*..... day of

Jan...... 191*2*.....

by leaving a copy of the within Summons with

Robert Devine

Defendant

W. R. Stuart

Sheriff

By *B. O. Wiggins*
Deputy Sheriff.

State of Alabama, }
Baldwin County. }

In the Circuit Court of
Baldwin County, Alabama,
in Equity.

TO THE HONORABLE J.D. LEIGH, JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY,
ALABAMA, -----IN EQUITY.

Your Oratrix, Lula Devine, respectfully represents and shows unto
Your Honor as follows:

First.

That she is a bona fide resident citizen of Baldwin County,
Alabama, and is over the age of twenty-one years

That Robert Devine, is a resident of Baldwin County, Alabama,
and is over the age of twenty-one years of age.

That both Your Oratrix, Lula Devine, and the said Robert
Devine are residing at Loxley, Alabama, Baldwin County.

SECOND.

That your Oratrix and the said Robert Devine were lawfully
married about six months ago, and that they are now man and wife.

THIRD.

That your Oratrix and the said Robert Devine lived together
for about four days, and that during that time, the said Robert De-
vine so cruelly treated your Oratrix as to make life unbearable,
that he struck her with his hand and thereby rendered it dangerous
to her life or health and that the said Robert Devine does not treat
your Oratrix as his wife, and from his conduct towards your Oratrix,
there is reasonable apprehension that he will again mistreat your
Oratrix, thereby endangering her life or health.

Prayer for Process.

The premises considered, Oratrix prays that the said Robert
Devine be made a party to this bill of complaint by the usual
Process of this honorable court, and that he be required to demur,
plead to or answer the same within the time and under the penalties
as provided by law, or that the same be forever confessed, and all
other orders and decrees that may be necessary to obtain the relief
prayed.

Prayer for Relief.

That upon the final hearing of this cause, your Honor will grant unto Oratrix an absolute divorce from the said Robert Devine, and that she be again allowed to contract marriage; that if your Oratrix be mistaken in the relief prayed, that Your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled, she will ever pray, etc.

PAGE AND MOORE.
Solicitors for Complainant.

FOOT NOTE.

The respondent, Robert Devine, is required to answer each and every allegation of this bill of complaint, numbered from FIRST to THIRD, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE AND MOORE.
Solicitors for Complainant.