

STATE OF ALABAMA,     :           IN THE CIRCUIT COURT,  
                          :           BALDWIN COUNTY, ALA.  
BALDWIN COUNTY.        :

IN EQUITY.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.-----IN EQUITY.

Your petitioner, John E. Strength, Little River, Alabama, respectfully represents and shows unto Your Honor as follows:

FIRST:

That he is a bona fide resident of Baldwin County, Alabama, over twenty-one years of age, and has lived in Baldwin County his entire life.

SECOND.

That Della Strength is over 21 years of age and her place of residence is unknown.

THIRD.

That petitioner and the said Della Strength were married during the year 1925 and lived together as man wife until to-wit: For about one month after their said marriage at which time the said Della Strength abandoned the bed and board of your petitioner and has not lived with him since; that she left your petitioner without just cause on his part and that the separation took place in Baldwin County, Alabama.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED, your petitioner respectfully prays that the said Della Strength be made party respondent to this bill of complaint by the usual process of this Honorable Court; that such orders, decrees and publications be made in this case as are necessary to perfect service on the said Della Strength, and that she be required to demur, plead to or answer same within the time and under the pains and penalties 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 grant unto your petitioner an absolute divorce from the said Della Strength.

That if your petitioner is mistaken in the relief prayed for, then Your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.

Henry D. Moorer,

Atty. For John E. Strength.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in the foregoing bill, paragraphs numbered "FIRST to THIRD", both inclusive, but not under oath, answer under oath being hereby expressly waived.

Henry D. Moorer.

Atty. For John E. Strength.

~~RECORDED~~  
*copy*

*John E. Strength*

*VS*

*Della Strength*

*Filed - Nov 10/1934*  
*H. D. Moorner Reg.*  
HENRY D. MOORNER  
ATTORNEY AT LAW  
BAY MINETTE, ALA.