

MARY JANE COBBS, Complainant;

-vs-

ELIJA COBBS, Defendant

IN THE CIRCUIT COURT, EQUITY
SIDE
BALDWIN COUNTY, ALABAMA.

TO THE HONORABLE, THE CURCUIT COURT OF BALDWIN
COUNTY, STATE OF ALABAMA, EQUITY SIDE, AND THE HONORABLE
JOHN D. LEIGH, JUDGE THEREOF, SITTING
IN EQUITY.

Comes your Complainant, Mary Jane Cobbs, and exhibits this, her Bill of Complaint, for divorce, against Elija Cobbs, the Defendant, on the grounds of desertion and abandonment and shows unto your Honor and unto this Court as follows:-

F I R S T.

That your complainant and the defendant are both over the age of twenty one years; that your complainant is a bone fida resident of Baldwin County, State of Alabama, where she has resided for more than three years next immediately preceeding the filing of this bill of complaint; that the defendant is a resident of the State of Alabama and resides in Mobile, Alabama, his more particular address being unknown to your complainant and cannot be ascertained after diligent inquiry on her part.

S E C O N D.

That your complainant and the defendant were married on to-wit: *about 5 yrs ago* and lived to-gether as man and wife for about two years and four months.

T H I R D.

That on to-wit, about April 1st., 1921, ^{*while residing in this county*} the defendant, Elija Cobbs, without just cause or legal excuse, voluntarily deserted and abandoned your complainant and has continued to so desert and abandon her since that time and has never returned to live with her. That said abandonment and desertion took place more than two years before the filing of this bill of complaint

THE PREMISES CONSIDERED:- Complainant prays that such orders, decrees, notices and supotenas be made and issued as are necessary to make the defendant party respondent to this bill of complaint, requiring him to appear and plead, answer or demur to this complaint

within the time required by law, under the pains and penalties of this Honorable Court.

PRAYER FOR RELIEF.

UPON THE FINAL HEARING OF THIS CAUSE, complainant prays that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between the complainant, Mary Jane Cobbs, and the defendant, Elija Cobbs, be forever dissolved and that your complainant be again permitted to contract the marriage relation should she so desire. And, as in duty bound, she will ever pray, etc.,

STONE & STONE.

Solicitors for Complainant.

FOOT NOTE:-

The defendant, Elija Cobbs, 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.

STONE & STONE.

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 Elijah Cobbs,

of Mobile 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

Mary Jane Cobbs,

against said Elijah Cobbs,

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 1st day of February,

1924.

T. W. Richerson

Register.

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

Serve on _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Mary Jane Cobbs,

RECORDED

vs.

Elijah Cobbs, *Col*

^dDefendant works for
standanrd Oil Co,
Mobile Ala.

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 _____ day of _____
192

by leaving a copy of the within summons with

Defendant.

Sheriff.

By _____
Deputy Sheriff.

*Returned, Not
found in my
County,
P. G. Cazalas
Sheriff
Mobile
By H. Burch
D.S.*

The State of Alabama }
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

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Copy (30)

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No.

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not found
Dr. Burch
D. P.

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