

ALONZO THOMAS,  
Complainant,

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

-vs-

BERTHA THOMAS,  
Defendant.

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

Comes your complainant, Alonzo Thomas, and exhibits this his bill of divorce, against the defendant, Bertha Thomas, for voluntary desertion and abandonment and for grounds thereof shows unto your Honor and unto this Court as follows:-

FIRST.

That your complainant and the defendant are both over the age of twenty one years; that your complainant is a bona fida resident of Baldwin County, State of Alabama, where he has resided for more than three years next preceeding the filing of this bill of complaint; that the defendant, Bertha Thomas, is a non-resident of the State of Alabama and resided, when last heard of, in the State of Michigan, her more particular address being unknown to your complainant and cannot be ascertained after deligent inquires on his part.

SECOND.

That your complainant and the defendant were married on, to-wit:- June, 1903, and lived together as man and wife for more than two years and that they were separated and have lived separate and apart since, to-wit:- November, 1919.

THIRD.

That on to-wit:- about November, 1919, the defendant, Bertha Thomas, without just cause or legal excuse, voluntarily deserted and abandoned your complainant and has continuted to so desert and abandon him since that time and has never returned to live with him. 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 subpoenas be made and issued as are necessary to make the defendant party respondent to this bill of complaint, requiring her 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, Alonzo Thomas, and the defendant, Bertha Thomas, be forever dissolved and that your complainant be again permitted to contract the marriage relation should he so desire. And, as in duty bound, he will ever pray, etc.,

STONE & STONE,

Solicitors for Complainant.

FOOT NOTE:-

The defendant, Bertha Thomas, 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.


STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, Norborne Stone, a Notary Public in and for said state and county, personally appeared Alonzo Thomas, who is known to me and who, after being by me first duly sworn doth deposes and says under oath:-

My name is Alonzo Thomas and I am the complainant in that certain cause now pending in the Circuit Court, equity side, State of Alabama, Baldwin County, wherein Bertha Thomas is the defendant. I am over the age of twenty one (21) years. Bertha Thomas is a non-resident of the State of Alabama and when last heard from resided somewhere in the State of Michigan, her exact address being unknown and cannot be ascertained by the Affiant after diligent inquiry on his part; that the said Bertha Thomas is over the age of twenty one (21) years and that service by publication is necessary to make her party defendant in the above styled cause.

Sworn to and subscribed  
before me this 14th day  
of April, 1924.

A circular notary seal is partially visible on the left side of the page, containing the text "NOTARY PUBLIC" and "ALABAMA".  
*Norborne Stone*  
Notary Public, Baldwin  
County, Alabama.

*Alonzo Thomas*  
*not*