

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

William A Burrell Complainant

vs.

Katie Burrell Defendant

Deposition of Henry Benefield, J. A. Newell and W.M. Skinner

By virtue of the appointment to take the Deposition, indorsed in writing, on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County, I, G. W. Groover, the Commissioner named by, Register of said Court of said County, have called and caused to come before me said Henry Benefield, J. A. Newell and W.M. Skinner,

the witness es named in the Interrogatories, and having first sworn the said witness es to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

Deposition of J. A. Newell:

Deposition of W.M. Skinner:

Deposition of Henry Benefield;

I, G.W. Groover, the commissioner, herein named, ~~the said Register~~, hereby certify that the foregoing

testimony was taken down in writing by me

in the words of the witness^{es}, and were read over to them, that th~~ey~~^{ey} assented, swore to and subscribed

the same in my presence, the 11th day of October, 1922, at

Hopewell, Alabama; that I have personal knowledge of, or had proof made before me

of the identity of the witness^{es}, and that I am not of counsel or of kin to any of the parties to said cause, or in

any manner interested in the result thereof.

And I enclose the deposition, together with the Interrogatories, ~~Direct and Cross~~, and the documents which were deposed to, in an envelope properly endorsed and sealed and placed the same on file in my office.

Given under my hand and seal this the 11th day of October, 1922

G.W. Groover Commissioner ~~Register~~

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
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.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....

REGISTER'S FEES.

.....	days at \$1.50 per day.....	\$.....
.....	words at 20 cents per hundred.....	\$.....

The State of Alabama,

_____ COUNTY.

IN CIRCUIT COURT, IN EQUITY.

William A Burrell

vs. Complainant,

Katie Burrell

Defendant.

Commissions
Deposition Taken Before Register on Interrogatories.

Deposition of *J. A. Newell Wm*

Against *Henry Benefield*
for *Comp account*

Filed _____ day of _____, 191 _____

Published by order of the Court _____

_____, 191 _____

Register.

The State of Alabama, }
Baldwin County.

No. 344. CIRCUIT COURT, IN EQUITY

Wm A Burrell Complainant

vs.

Katie Burrell, Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the Complainant is forever divorced from the Defendant.

Voluntary Abandonment as-

It is further ordered, that the said Wm A Burrell, be, and he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Wm A Burrell pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said Katie Burrell,

It is further ordered, adjudged and decreed that said Wm A Burrell shall not again marry except to said Katie Burrell, until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Katie Burrell, during the pendency of said appeal.

This 10th day of November 1922

John D. Leigh
Judge of the Circuit Court of Baldwin County.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

I, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the day of 1922, in the cause of

Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the day of 1922

Register.

No. 344.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Wm. A. Burrell

Vs.

Katie Burrell,

DECREE OF DIVORCE.

Filed in office this

11th

day of

Nov

1922

Register.

E. O. M.

RECORDED

ROAD

WNEBWIN

10/11/22
Katie Burrell
10/11/22
Katie Burrell

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

W.A. Burrell Complainant

vs.

Katie Burrell, Defendant

Deposition of W.A. Burrell,

By virtue of the appointment to take the Deposition, indorsed in writing, on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County, I,

T.W. Richerson, Register of said Court of said County, have called and caused to come before me W.A. Burrell,

the witness named in the Interrogatories, and having first sworn the said witness to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

My name is W.A. Burrell and I have been a resident of Baldwin County Alabama since 1914, continuously excepting 13 months that I was in the U.S. Service. I have been a bonafide resident of Baldwin County since May 1st 1921 residing at Loxley in Baldwin Co. Ala, where I own a home and 20 acres of land, I am off at work at times on the Railroad. Katie Burrell the Respondent in the cause is a non-resident of the State of Alabama residing at Egan Park near Atlanta Ga. Katie Burrell and I were married in 1914 in the City of Atlanta Ga. on the 3rd day of May of said year, and in the Fall of 1914 we went to live at Hopewell Cleburne County Alabama, where we lived as man and wife until the Fall of 1915, About the 15th day of December 1915, Katie Burrell without any fault on my part, abandoned my bed and board and Home at Hopewell, Alabama, and went to reside at Egan Park Ga, after she left me on said date and since said time she has remained away and has failed and refused to resume marital relations with me, and without any fault on my part, I wrote her and even sent her money to come home on and she refused to come and has remained away ever since. I continued to reside at Hopewell Ala, until I was drafted in the Army on to wit: May 25th, 1918, and I was discharged June

June 25th, 1919, I returned to Alabama in June 1919, after my discharge from the Army where I have continued to reside ever since and have been a bonafide resident of this State ever since. Along in the Spring of 1921 I came to live in Baldwin County where I bought a place at Loxley, and have been a bonafide resident of Baldwin County ever since.

Wm A Russell

I, T. W. Ricimmon, the said Register, hereby certify that the foregoing testimony was taken down in writing by Myself in the words of the witness, and were read over to him, that th_____ assented, swore to and subscribed the same in my presence, the 23 day of Oct, 1922, at Bayou La Pate, Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and that I am not of counsel or of kin to any of the parties to said cause, or in any manner interested in the result thereof.

And I enclose the deposition, together with the Interrogatories, Direct and Cross, and the documents which were deposed to, in an envelope properly endorsed and sealed and placed the same on file in my office.

Given under my hand and seal this the 23rd day of Oct, 1922
T. W. Ricimmon, Register.

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
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.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....
.....	days' attendance at \$1.50 per day.....	\$.....

REGISTER'S FEES.

.....	days at \$1.50 per day.....	\$.....
.....	words at 20 cents per hundred.....	\$.....

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

James A. Powell

vs. Complainant,

Katie Powell

Defendant.

Deposition Taken Before Register on Interrogatories.

Deposition of *Complainant*

for *Complainant*

Filed *23* day of *Oct*, 19*22*

Published by order of the Court *23*

Oct, 19*22*

W. H. ...
Register.

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 Katie Burrell,

of Begin Park Ga. ~~County,~~ to be and appear before the Judge of the Circuit Court of Bald-

win 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

W.A. Burrell,

against said

Katie Burrell,

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 5th, day of June

1922.

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

vs.

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

June 7/1922.
Copy of Summons
and Copy of
Bill sent by Reg-Mail
to Katie Burnett
Beagin Park
Ga.

Wm A Burell,)
Complainant.)
vs)
Katie Burell,)
respondent)

In The Circuit Court of Baldwin County,
Alabama.
In Equity .

To the Honorable John D. Leigh, Judge of the Twenty First Judicial Circuit
of Alabama;

The Bill of Complaint of William A Burell, exhibited against Katie Burell,
respectfully represents unto your Honor as follows:

First. That your Orator and Katie Burell, the respondent, were lawfully mar-
ried in the City of Atlanta, Georgia, on towit, the 3rd day of March, 1914;
that in the Fall of 1914 they moved to Cleburn County, Alabama and lived -
there as man and wife, until about the 15th day of December, 1915, when the
said Katie Burell, respondent herein named, left your Orator and the place
where they lived in Cleburne County, Alabama, and she has not returned since
that time; that the last time your Orator heard of her, she was living at -
Egean Park, near the City of Atlanta, Georgia.

Second. That your Orator is now and has been for more than three years next
preceeding the filing of the Bill in this cause a bona fide resident of the
state of Alabama and has been a bona fide resident of Baldwin County, since
October 1st, 1921.

Third. That your Orator and the said Katie Burell, the respondent herein
named, are both over the age of twenty one years and respondent is now a
resident of Egean Park, Georgia, and is a nonresident of the state of Alabama.

Fourth. That without legal cause or good excuse, the said respondent, Katie
Burrell, on towit, the 15th day of December, 1915, did abandon the bed and
board of your Orator and has remained away ever since and for over two years
next before the filing of this Bill in this cause, she has remained away and
has failed and refuses to resume marital relations with your Orator and with-
-out any fault on his part.

Wherefore, your Orator prays, That your Honor will take jurisdiction of the
cause made by this Bill and that said Katie Burell be made a party respondent
to the same and the said Katie Burell, by appropriate process to be served -
and issued upon her, be made to answer this Bill. And that it may please -
your Honor, on the hearing of said cause, to decree that the bonds of matri-
-mony existing between your Orator and Katie Burell be dissolved, and that
your Orator may be permitted to marry again and for such other and further -
relief as to equity may seem meet and your Orator will ever pray etc.

J. Jenkins

Solicitor for Complainant

Note: The respondent is required to answer the alligations of the foregoing
Bill, but not under oath, her oath is hereby waived.

J. Jenkins

Solicitor for Complainant .

W.A. Burrell,

No. 344

Katie Burrell,

vs.

THE STATE OF ALABAMA,

Baldwin COUNTY.

CIRCUIT COURT, IN EQUITY.

This the 19th day of

July, 1922

In this cause it being made to appear to the Clerk of this Court by the affidavit of

Hon. S.C. Jenkins, Solicitor for Complainant,

that the Defendant Katie Burrell

is a non-resident of the State of Alabama residing in the State of Georgia and when last heard from was at Lagin Park near the City of Atlanta Ga.

and further, that, in the belief of said Affiant..... the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin

County, Alabama, once a week for four consecutive weeks, requiring the said Katie Burrell,

to answer or demur to the Bill of Complaint in this cause by the 19th day of Aug - 1922,

or after thirty days therefrom a decree Pro Confesso may be taken against her.

W.A. Burrell
Register.

W.A. Burrell,

vs.

Katie Burrell,

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,

Decree pro confesso and testimony of Henry Benefield, W.M. Skinner
and J.A. Hewell, and W.A. Burrell,

and in behalf of Defendant upon

T. W. Peterson
Register

4

No. 344

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

W. A. Burrell

vs.

Katie Burrell

NOTE OF TESTIMONY.

Filed in Open Court this *8th*

day of *Nov* 19*22*

J. M. Ricumore

Register

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 344. Vacation Term, 1922

W.A. Burrell,

Complainant.....

vs.

Katie Burrell,

Defendant.....

To T.W. Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the

Complainant, by S.C. Jenkins,

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

S.C. Jenkins,

Solicitor for Complainant.

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

W. A. Burrell,

vs.

Ketie Burrell

REQUEST FOR DECREE IN
VACATION.

Filed November 8th, 1912

T. W. Burrell

Register

Recorded in Record

Vol. Page

RECORDED

Register

THE STATE OF ALABAMA,
BALDWIN COUNTY.

} CIRCUIT COURT, IN EQUITY.
No. 344. Vacation Term, 19 22.

..... W. A. Burrell Complainant.....
vs. Katie Burrell Defendant.....

In this cause it appears to the Register T. W. Richerson that the order of publication here-
tofore made in this cause, was published for four consecutive weeks, commencing on the 19th day of
..... July, , 19 22, in the Baldwin Times,
a newspaper published in Baldwin County, Alabama, that a copy of said order was posted at the Court
House door in Baldwin County, on the 19th day of
..... July, 1922, and

And it now further appearing to the Register T. W. Richerson,, that the said
..... Katie Burrell,
.....
.....
having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, there-
fore, on motion of Complainant....., ordered and decreed by the Register T. W. Richerson, that the
Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said
..... Katie Burrell,

This 25th, day of September , 1922.

T. W. Richerson
.....
Register.

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No. 344. Page

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY

W. A. Burrell

vs.

Katie Burrell.

DECREE PRO CONFESSO ON
PUBLICATION.

Issued September 25th, 19 22.

J. W. Beckwith
Register.

Recorded in Record

Vol. Page

Register.

RECORDED

The State of Alabama, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 344. Vacation Term, 1922.

W.A. Burrell Complainants

vs.

Katie Burrell. Defendants

Motion is hereby made for a Decree Pro Confesso against Katie Burrell

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 23rd day of September, 1922.

746 Code.

S. C. Gentling

Solicitor.

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No. 344.

Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

W. A. Burrell

Complainants.

Vs.

Katie Burrell.

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed September 23rd, 1922

T. W. Rice

Register.

Recorded in Record,

Vol. Page

Register.

Baldwin Times Print, Bay Minette.

RECORDED

Faint vertical text and bleed-through from the reverse side of the page.

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Nail, being duly sworn, deposes and says that he is the ^{Owner} ~~FOREMAN~~ of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Notice to non-resident, W. A. Burrell vs.

Katie Burrell, No. 334

T. W. Richerson,
Register.

Hon. S. C. Jenkins, Atty for Com-plainant. 23-4t

Was published in said Newspaper for _____ consecutive weeks in the following issues:

Date of first publication	<u>July 20 1922</u>	Vol. <u>33</u>	No. <u>23</u>
“ “ second “	<u>July 27 1922</u>	Vol. <u>33</u>	No. <u>24</u>
“ “ third “	<u>August 3 1923</u>	Vol. <u>33</u>	No. <u>25</u>
“ “ fourth “	<u>August 10 1923</u>	Vol. <u>33</u>	No. <u>26</u>

Subscribed and sworn to before the undersigned

this 23rd day of November 1922.

T. W. Richerson
Clerk Circuit Court.

R. B. Nail
Foreman,
Owner.

Notice to Non-Resident.
W. A. Burrell vs. Katie Burrell. No. 334. The State of Alabama, Baldwin County. Circuit Court, In Equity. This the 19th day of July, 1922.
In this cause it being made to appear to the Clerk of this Court by the affidavit of Hon. S. C. Jenkins, Solicitor for Complainant, that the Defendant Katie Burrell, is a non-resident of the State of Alabama, residing in the State of Georgia and when last heard from was at Eagin Park, near the City of Atlanta, Ga., and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Katie Burrell, to answer or demur to the Bill of Complaint in this cause by the 19th day of July, 1922, or after thirty days therefrom a decree Pro Confesso may be taken against her.

Bay Minette, Ala.,

February 21st, 1921

M

Mary Jane Baggette
vs
Lee Eugen Baggette

NOTICE TO NON-RESIDENT
Stone & Stone
Attys

THE BALDWIN TIMES

ABNER J. SMITH, PROPR.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

All Bills Must Be Paid Within 30 Days

To publishing above Notice in issues of January 30th,
February 3rd, 10th and 17th.....

\$5.00

BOYD
HAYNES WILF

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

W. M. Moore, being duly sworn, deposes and says that he is the FOREMAN of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

NOTICE TO NON-RESIDENT

No. 290

Mary Jane Baggett

VS

Lee Eugen Baggett

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<u>January 30th, 1921</u>	Vol. <u>31</u>	No. <u>49</u>
“ “ second “	<u>February 3rd, 1921</u>	Vol. <u>31</u>	No. <u>50</u>
“ “ third “	<u>February 10th, 1921</u>	Vol. <u>31</u>	No. <u>51</u>
“ “ fourth “	<u>February 17th, 1921</u>	Vol. <u>31</u>	No. <u>52</u>

Subscribed and sworn to before the undersigned

this 2nd day of Feb 1921.

T. W. Richerson
Clerk Circuit Court.

W. M. Moore
Foreman.

Notice to Non-Resident.
Mary Jane Baggett vs. Lee Eugen Baggett.
No. 290.

The State of Alabama, Baldwin County. Circuit Court, In Equity. This the 19th day of January, 1921.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Mary Jane Baggett, Complainant, that the Defendant Lee Eugen Baggett, is a non-resident of the State of Alabama, and when last heard from resided at Nona, in the State of Texas; that his more particular address cannot be ascertained after diligent inquiry on her part, and further, that in the belief of said Affiant the Defendant is over the age of 21 years it is, therefore ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Lee Eugen Baggett, to answer or demur to the Bill of Complaint in this cause by the 19th day of February, 1921, or after thirty days therefrom a decree Pro Confesso may be taken against him.

T. W. Richerson.
Register.

49-4t

AFTER FIVE DAYS RETURN TO
T. W. RICHESON
CLERK OF THE CIRCUIT COURT AND
REGISTER IN CHANCERY
BAY MINETTE, ALA.

R



Second Notice
JUL 7 0 1922

The words "Second Notice" are printed in a large, bold, serif font. Below it, "JUL 7 0 1922" is printed in a smaller font. A blue ink scribble is present to the right of the date.

(Deliver to addressee only.)
(Return receipt demanded.)

RETURNED
TO
WRITER
UNDELIVERED.
FROM ATLANTA, GA.

Mrs Katie Burrell
Egan Park
Atlanta Ga.

A vertical stamp on the right side of the envelope, oriented upside down. It contains the text "RETURNED TO WRITER UNDELIVERED. FROM ATLANTA, GA." and the recipient's address: "Mrs Katie Burrell, Egan Park, Atlanta Ga."

~~20742~~

A blue ink scribble that appears to be a crossed-out number, "20742".

Wm A Burrell, Complainant.

vs

Katie Burrell, Respondent.

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

To the Honorable John D Leigh, Judge of the Twenty First
Judicial Circuit of Alabama.

The Bill of Complaint of William A Burrell exhibited *against*
Katie Burrell, represents unto your Honor as follows :
First: That your Orator and Katie Burrell, the respondent, were
lawfully married in the City of Atlanta, Georgia, on to wit:
the 3rd, day of March, 1914, that in the Fall of 1914, they moved
to Cleburn County, Alabama, and lived there as man and wife,
until about the 15th, day of December, 1915, when the said Katie
Burrell, respondent herein named, left your Orator and the place
where ~~they~~ lived in Cleburn County, Alabama, and she has not
returned since that time; that the last time your Orator heard
of her, she was living at Egan Park, near the City of Atlanta
Georgia.

Second: That Your Orator is now and has been for more than
three years next preceding the filing of the Bill in this case
a bon a fide resident of the State of Alabama, and has been
a bon a fide resident of Baldwin County, since October 1st, 1921.

Third: That your Orator and the said Katie Burrell, the respondent
herein named, are both over the age of twenty-one years and re-
spondent ~~is now a resident of~~ Egan Park, Georgia *and* is a non resident
of the State of Alabama,

Fourth: That without legal cause or good excuse, the said respond-
ent, Katie Burrell, on to wit: the 15th, day of December, 1915,
did abandon the bed and board of your Orator and has remained away
ever since and for over two years next before the filing of this
bill in this cause, she has remained away and has failed and refuses
to resume marital relations with your Orator and without any
fault on his part.

Wherefore, your Orator, *prays* That your Honor will take jurisdiction
of the cause made by this Bill and that said Katie Burrell
be made a party respondent to the same and the said Katie Burrell
by appropriate process to be served and issued upon her, be
made to answer this Bill. And that it may please your Honor, on
the hearing of said cause, to decree that the bonds of matrimony
existing between your Orator and Katie Burrell be dissolved
and that your Orator may be permitted to marry again and for such
other and further relief as to equity may seem meet and your Orator
will ever pray etc.

S.C. Jenkins.

Solicitor for Complainant.

Note:- The respondent is required to answer the allegations of the
foregoing Bill, but not under oath, her oath is hereby waived.

S.C. Jenkins.

Solicitor 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 Katie Burrell,

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

W.A. Burrell.

against said

Katie Burrell.

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 5th day of July,
.....1922.

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

vs.

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

Handwritten signature or initials in red ink.