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MARY MATILDA PRESSLY,
Complainant.

-vs-

CALVIN PRESSLY,
Defendant.

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

Comes your Complainant, Mary Matilda Pressly, and exhibits this, her bill of divorce against the defendant, Calvin Pressly, for cruelty, and shows unto this Court as follows:-

-FIRST-

That your complainant and the defendant are both over the age of twenty-one years and that they are both "bona fide" residents of Baldwin County, Alabama, where they have resided for many years, your complainant now living at Dyas and the defendant living at Lottie.

-SECOND-

That your complainant and the defendant were married on to-wit: October 9th., 1918, at Lottie in said County and State and that they lived together as man and wife until, to-wit: May 26th., 1923.

-THIRD-

That during the last year that complainant lived with defendant that the defendant treated your complainant in a cruel and inhuman manner; cursing, abusing and striking her; that he has often threatened her life; that on to-wit; May 26th the defendant slapped complainant and also struck her in the face with his fist and was only prevented from inflicting further injuries ~~to~~ hereby the interference of complainant's daughter who was present; that the defendant committed actual violence on the person of the complainant, and that your complainant, from the conduct of the defendant, feared a recurrence of such violence attended with danger to life and health; that on account of such cruelties your complainant was compelled to leave the home of the defendant and to seek safety at the home of her brother where she is now.

FOURTH.

Complainant shows unto this Court that she is without property of her own and is unable to earn a living; that the defendant owns both real and personal property of the value of about five thousand dollars (\$5000); that he is an experienced farmer and earns a good living; that your complainant is without means of support and is not able to pay her Solicitor's fees for the prosecution of this suit.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED:- Complainant prays that such orders, decrees, notices and subpoenas be made and issued as are necessary to make the said 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 order and decree a reference to be held by and before the Register of this Court, to determine the extent of the property, both real and personal, of the defendant and the value thereof and to ascertain and fix a reasonable amount as alimony, pendente lite and permanent, and as counsel^{fees} to be paid to the complainant for the prosecution of this suit, all of such sums to be suitable and commensurate with the property and earning capacity of the defendant and with the condition and state in life of your complainant; and that such findings be reported by the Register to your Honor; that upon the making of such report that your Honor will render and decree unto the complainant such amounts for alimony pendente lite and as Solicitor's fees as are consistent with the property and earning capacity of the defendant and ^{with} ~~as~~ the condition and state in life of complainant. That 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 and the defendant be forever dissolved and that your complainant be again permitted to contract the marriage relation, should she so desire; that your Honor will render and decree unto your complainant a

suitable amount to be paid to her by the defendant as permanent alimony in such manner and amount as your Honor may deem proper and, as in duty bound, your complainant will ever pray, etc., etc.,

STONE & STONE.

Solicitors for Complaint.

FOOT NOTE:-

The defendant, Calvin Pressly, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOURTH", both inclusive, but not under oath, answer under oath being hereby expressly waived.

STONE & STONE.

Solicitors for Complaint.

- - - - - *
 MARY MATILDA PRESSLY, (
 Complainant. (
 - vs - (
 CALVIN PRESSLY, (
 Defendant. (
 - - - - - x

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

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 ALABAMA, EQUITY SIDE, AND THE HON. JOHN D. LEIGH, JUDGE
 THEREOF, SITTING IN EQUITY:-

Comes your Complainant, Mary Matilda Pressly, and exhibits
 this, her bill of divorce against the defendant, Calvin Pressly,
 for cruelty, *and shows unto this court as follows;*

-FIRST-

That your complainant and the defendant are both over the
 age of twenty-one years and that they are both "bona fide" res-
 idents of Baldwin County, Alabama, where they have resided for
 many years, your complainant now living at Dyas and the defendant
 living at Lottie.

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That your complainant and the defendant were married on
 to-wit: October 9th., 1918, at Lottie in said County and State
 and that they lived together as man and wife until, to-wit:
 May 26th., 1923.

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That during the last year that complainant lived with de-
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 and inhuman manner; cursing, abusing and striking her; that he
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 fendant slapped complainant and also struck her in the face with
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~~parharby~~ by the interference of complainant daughter who was pres-
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 of the complainant, and that your complainant, from the conduct
 of the defendant feared a recurrence of such violence attended
 with danger to life and health; ~~that~~ on account of such cruelties
 your complainant was compelled to leave the home of the defendant
 and to seek safety at the home of her brother where she is now.

FOURTH.

Complainant shows unto this Court that she is without property of her own and is unable to earn a living; that the defendant owns both real and personal property of the value of about five thousand dollars (\$5000); that he is an experienced farmer and earns a good living; that your complainant is without means of support and is not able to pay her Solicitor's fees for the prosecution of this suit.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED:- Complainant prays that such orders, decrees, notices and subpoenas be made and issued as are necessary to make the said 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 order and decree a reference to be held by and before the Register of this Court, to determine the extent of the property, both real and personal of the defendant and the value thereof and to ascertain *and fix a reasonable* amount as alimony pendente lite and permanent and as counsel to be paid to the complainant for the prosecution of this suit, all of such sums to be suitable and commensurate with the property and earning ^{cap-} ~~cap-~~ ability of the defendant and with the condition and state in life of your complainant; and that such ^{find-} ~~find-~~ ings be reported by the Register to your Honor; that upon the making of such report that your Honor will render and decree unto the complainant such amounts for alimony pendente lite and as Solicitor fees as are consistent with the property and earning capacity of the defendant and of the condition and state in life of complainant That 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 and the defendant be for ever dissolved and that your complainant be again permitted to contract the marriage relation, should she so desire that your Honor will render and decree unto your complainant a

suitable amount to ~~be~~ repaid to her by the defendant as permanent alimony in such manner and amount as your Honor may deem proper and, as in duty bound, your complainant will ever pray, ~~etc.~~,^{etc.}
etc.,

STONE & STONE.

Solicitors for Complaint.

FOOT NOTE:-

The defendant, Calvin Gressly, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOUR", both inclusive, but not under oath, answer under oath being hereby expressly waived.

Handwritten notes in left margin:
The defendant is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOUR", both inclusive, but not under oath, answer under oath being hereby expressly waived.

Handwritten notes in middle margin:
The defendant is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOUR", both inclusive, but not under oath, answer under oath being hereby expressly waived.

Handwritten notes in right margin:
The defendant is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOUR", both inclusive, but not under oath, answer under oath being hereby expressly waived.

Handwritten notes in far right margin:
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STONE & STONE.

Solicitors for Complaint.