

HATTIE BRADLEY, COMPLAINANT, }

VS.

CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY.

:

CLEVE BRADLEY, RESPONDENT. }

To the Honorable A. E. Gamble, Judge of the Circuit Court of Baldwin County, Alabama, In Equity:

Your Complainant, Hattie Bradley, represents and shown unto your Honor as follows:

1. That your Complainant, Hattie Bradley, is over the age of 21 years and resides in Covington County, Alabama, and has been a bona fide resident citizen of the State of Alabama for more than three years next before the filing of this Bill of Complaint. That the Respondent, Cleve Bradley, is over the age of 21 years and is a resident of Baldwin County, Alabama.

2. That during the year 1913 your Complainant and the said Cleve Bradley were married to each other in Conecuh County, Alabama, and lived together as man and wife until February, 1921, and resided during said time in Conecuh and Covington County, Alabama.

3. That during the month of February, 1921, while your Complainant and the said Cleve Bradley were living in Conecuh County, the said Cleve Bradley voluntarily abandoned your Complainant without any fault on her part, and since said separation he has remained continuously away from your Complainant, and has not contributed in any way to her support since the separation occurred.

The premises considered, your Complainant prays that the said Cleve Bradley be made a party Respondent to this cause and that a summons be issued in the manner prescribed by law requiring the said Respondent to plead, answer or demur to this Bill of Complaint within the time required by law, or the same will be taken as confessed by him; and that upon a final of this cause your Honor will order, adjudge and decree that the bonds of matrimony heretofore existing between your Complainant and the Respondent be forever dissolved and that your Complainant be allowed to contract marriage again. Complainant prays for such other and further relief as the facts of the case may justify, and as in duty bound will ever pray.

Marcus J. Fletcher
Attorney for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in paragraphs numbered from 1 to 3, inclusive, but not under oath, it being hereby expressly waived.

Marcus J. Fletcher
Attorney for Complainant.