

Julius Johnson,
Complainant.)

vs)

Erline Johnson,
Respondent.)

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.

Comes Erline Johnson, by her Attorneys Messrs. Page & Moorer, and for answer to the original bill filed in this cause, says:

Respondent admits the allegations contained in the first paragraph of the original complaint, except that part which states that they were married in January 1919 which she specifically denies.

Respondent denies each and every allegation contained in the second paragraph of the complaint and states the truth to be that the said Julius Johnson voluntarily abandoned the bed and board of Respondent without any fault on her part.

Cross Bill.

1. Respondent further states that she is the mother of Oscie Leonard Johnson, age 8, Isburn Jack Johnson, age 6 and Francis Stein Johnson, age 4, and that Julius Johnson is the father of said children.

2. That Julius Johnson is an able bodied man making considerable money and Respondent is dependent upon her father for the support of herself and minor children in connection with what she can earn herself which is very little on account of not being able to leave her said children.

Respondent prays that the said Julius Johnson be made party respondent to this cross bill and that all orders and decrees be issued necessary to perfect service of same upon the said Julius Johnson; that Your Honor will order a reference to determine the amount of temporary alimony and Attorneys fees together with the amount of permanent alimony to be paid Respondent by the said Julius Johnson.

That if Respondent is mistaken in the relief prayed then your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled.

PAGE & MOORER,

Solicitors for Complainant.

FOOT NOTE:

The Julius Johnson is required to answer each and every allegation of this Cross Bill numbered from 1 to 2, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORE,
Solicitors for Respondent.

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 Erline Johnson,

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

Julius Johnson,

against said Erline Johnson,

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 September

1923.

T. W. Richerson
Register.

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

2 Original

Serve on.....

Circuit Court of Baldwin County
In Equity

No.....

SUMMONS

Julius Johnson,

vs.

Erline Johnson.

*at Point Clear,
or Kettle,
at Sandy Springs.*

RECORDED

Webb & Shepard.
Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this *5th*,
day of *September*, 192 *3*.

Sheriff.

Executed this *1st* day of
oct 192 *3*

by leaving a copy of the within summons with
Erline Johnson

Defendant.

W.R. Stuart
Sheriff.

By
Deputy Sheriff.

JULIUS JOHNSON,
COMPLAINANT.

VS.

ERLINE JOHNSON,
RESPONDENT.

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

NUMBER _____.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

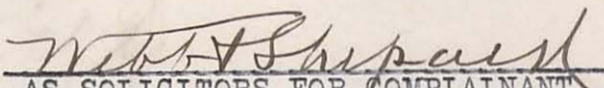
THE BILL OF COMPLAINT OF JULIUS JOHNSON, EXHIBITED
AGAINST ERLINE JOHNSON, RESPECTFULLY REPRESENTS AND SHOWS UNTO
YOUR HONOR THE FOLLOWING:

1.- That the complainant, Julius Johnson, commonly
called Jack Johnson, married Erline Johnson, in January, 1919,
in Baldwin County, Alabama; that they are both more than twenty-
one years of age; that they are both bona fide residents of said
Baldwin County, Alabama, and have been since their birth.

2.- That the said Erline Johnson voluntarily abandoned
complainant, without fault on his part, in February, 1919, which
abandonment has continued for more than two years, and up to the
present time.

PRAYER.

The premises considered, complainant prays that his
said wife, Erline Johnson, be made party defendant to this bill
of complaint, and that such process issue and proceedings be had
as are in conformity with the rules and practice of this Honorable
Court, and that your Honor will, upon his making due proof of the
allegations of this Bill, grant him a decree of divorce from the
bonds of matrimony.


AS SOLICITORS FOR COMPLAINANT.

FOOT NOTE :: The respondent is required to answer each of the
allegations of the foregoing bill of complaint, but not under
oath, answer under oath being hereby expressly waived.


AS SOLICITORS FOR COMPLAINANT.