

ANNA LOWELL,  
COMPLAINANT.

VS.

V. McRANDALL LOWELL, alias  
MACK LOWELL,  
RESPONDENT.

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

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

THE BILL OF COMPLAINT OF ANNA LOWELL, EXHIBITED AGAINST V. McRANDALL LOWELL, ALIAS MACK LOWELL, RESPECTFULLY REPRESENTS AND SHOWS UNTO YOUR HONOR THE FOLLOWING:

1.- That Complainant and respondent were lawfully married to each other in Pensacola, Florida, on July 28th., 1923; that complainant is over the age of twenty-one years, and the respondent is twenty years of age; that both complainant and respondent are bona fide residents of Fairhope, Baldwin County, Alabama, where they have lived, continuously, for more than ten years next immediately preceding the filing of the bill of complaint in this cause.

2.- That since said marriage and during the month of August, 1923, the said Respondent, V. McRandall Lowell committed adultery with a woman whose name at this time is *unknown to Cratrix*; that he contracted a venereal disease and has transmitted said disease to your oratrix, and caused her to become sick and to suffer great physical pain and mental anguish, and greatly endanger her health, and necessitate her treatment by a physician. Complainant further shows unto your Honor that since she discovered the adultery of her said husband, and since she learned that she is suffering from a venereal disease transmitted to her by him, she has had nothing further to do with him and has ceased to live with him.

PRAYER.

The premises considered, complainant prays that her said husband 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 Court, and that on the hearing of this cause, she be granted a divorce from the bonds of matrimony, and complainant prays for such other, further and different relief as she may be found entitled to receive.. And complainant will ever pray, etc.

*Webb & Shepard,*  
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.

*Webb & Shepard*  
SOLICITORS FOR COMPLAINANT.

RECORDED

ANNA LOWELL,  
Complainant.

vs.

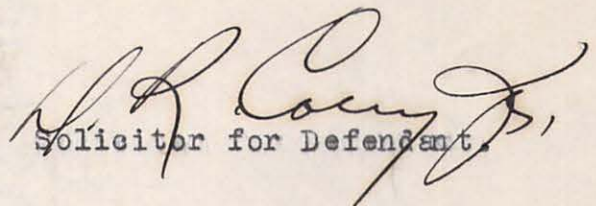
V. McRandall Lowell,  
alias Mack Lowell,  
Respondent.

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

Comes the Defendant in the above entitled cause and for answer to the bill of complaint herein filed, admits the allegations as to the names, ages and residence of the parties. He denies each and every other allegation thereof, and demands strict proof thereof.

  
Solicitor for Defendant.

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 V. Mc Randall Lowell, alias Mack Lowell,

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

Anna Lowell,

against said

V. Mc Randall Lowell alias Mack Lowell,

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 29th, day of Sept.

192 3.

*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

Anna Lowell,

vs.

V. Mc Randall Lowell alias  
Mack Lowell.

Webb and Shepard.

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.

The State of Alabama }  
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

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1923.

*T. W. Richerson*

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Serve on \_\_\_\_\_

Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

Anna Lowell,

vs.

V. Mc Randall Lowell alias  
Mack Lowell.

*Answer filed*

Webb and Shepard.  
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.