

2115

STATE OF ALABAMA, : In the Circuit Court of
: Baldwin County, Alabama,
BALDWIN COUNTY. :
: In Equity.

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

Your Oratrix, Rebecca Marshall, respectively represents
and shows unto Your Honor as follows:

First.

That she is a bona fide resident citizen of Baldwin
County, Alabama residing at Bay Minette and is over the age
of twenty-one years.

That John Marshall is over the age of twenty-one years
and resides at 180 Divillo Street, Philadelphia, Pennsylvania.

That your Oratrix and the said John Marshall were law-
fully married on March 13th, 1919 and lived together as man
and wife until January 23rd, 1922, at which time the said
John Marshall beat your Oratrix by striking her with his fist;
that your Oratrix's life and health were endangered, and that
from the conduct of the said John Marshall, your Oratrix had
reasonable apprehension of such filing on the part of said
John Marshall as to endanger her life and health.

Prayer for Process.

The premises considered, Oratrix prays that the said
John Marshall be made a party to this bill of complaint by the
usual Process of this honorable court, and that he be required
to demur, plead to or answer the same within the time and under
the penalties as provided by law, or that the same be forever
confessed, and all other orders and decrees that may be necessary
to obtain the relief prayed.

Prayer for Relief.

That upon the final hearing of this cause, your Honor will grant unto Oratrix an absolute divorce from the said John Marshall and that she be again allowed to contract marriage; that if your Oratrix be mistaken in the relief prayed, that your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled, she will ever pray, etc.

P A G E and M O O R E R,
Solicitors for Complainant.

FOOT NOTE:

The respondent, John Marshall, is required to answer each and every allegation of this bill of complaint, but not under oath, answer under oath being hereby expressly waived.

P A G E and M O O R E R,
Solicitors for Complainant.