

FORE ALLEGES THE FACT TO BE THAT DEFENDANT VISITED HER RELATIVES AND FRIENDS IN LEWIS COUNTY THREE OR FOUR YEARS AGO, BUT THAT PLAINTIFF KNOWS OF HIS OWN KNOWLEDGE THAT DEFENDANT DID NOT VISIT NOR OFFER TO VISIT HIM OR THEIR TWO MINOR CHILDREN AT ANY TIME SINCE SHE ABANDONED PLAINTIFF MORE THAN NINE YEARS AGO, THAT THE DEFENDANT HAS NEVER RETURNED NOR OFFERED TO RETURN TO PLAINTIFF.

6.

THAT PLAINTIFF HAS SUPPORTED AND CARED FOR THE TWO MINOR CHILDREN BY PROVIDING A HOME FOR THEM AND SENDING THEM TO SCHOOL AND SUPPLYING THEM WITH EVERY NEED WITHIN HIS MEANS; THAT HE IS FULLY COMPETENT, WILLING AND FINANCIALLY ABLE TO CONTINUE THEIR SUPPORT AND CARE;

7.

THAT PLAINTIFF PROVIDED THE BEST HOME AND COMFORT FOR THE DEFENDANT THAT HIS MEANS WOULD AFFORD, AND IN EVERY WAY TREATED THE DEFENDANT IN AN AFFECTIONATE AND PROPER MANNER, BUT NOTWITHSTANDING THAT FACT, THE DEFENDANT LEFT AND ABANDONED PLAINTIFF, AND PLAINTIFF DOES NOT NOW KNOW THE WHEREABOUTS OF THE DEFENDANT.

8.

THAT BY REASON OF DEFENDANTS ABANDONMENT OF PLAINTIFF, IT HAS BECOME AND IS NOW IMPOSSIBLE FOR PLAINTIFF AND DEFENDANT TO CONTINUE AS MAN AND WIFE.

WHEREFORE PLAINTIFF PRAYS JUDGMENT AS FOLLOWS:

1- THAT THE BONDS OF MATRIMONY HERETOFORE EXISTING BETWEEN THE PLAINTIFF AND DEFENDANT HEREIN BE DISSOLVED AND THAT PLAINTIFF BE GRANTED A DECREE OF ABSOLUTE DIVORCE FROM THE DEFENDANT.

2- THAT THE PLAINTIFF BE GRANTED THE SOLE CARE AND CUSTODY OF THE TWO MINOR CHILDREN HEREIN NAMED.

3- THAT THE REAL PROPERTY HEREIN DESCRIBED BE DECREED TO BE THE SOLE AND SEPARATE PROPERTY OF THE PLAINTIFF.

4- FOR SUCH OTHER AND FURTHER RELIEF AS TO THE COURT SHALL APPEAR JUST AND EQUITABLE IN THE PREMISES.

C. DELL FLOYD, ATTORNEY FOR  
PLAINTIFF.

VERIFIED BY L. E. BLACK, PLAINTIFF HEREIN, BEFORE A NOTARY PUBLIC FOR WASHINGTON ON APRIL 26, 1919, SEAL

STATE OF WASHINGTON }  
COUNTY OF LEWIS } ss.

SHERIFF'S RETURN  
FILED OCT. 22, 1919

I, J. F. BERRY, SHERIFF OF LEWIS COUNTY, WASHINGTON, DO HEREBY CERTIFY THAT I RECEIVED THE WITHIN AFFIDAVIT ON THE 22ND DAY OF OCT. 1919 AND THAT AFTER DILIGENT SEARCH AND INQUIRY I AM UNABLE TO FIND THE WITHIN NAMED DEFENDANT SUSIE AMELIA BLACK IN LEWIS COUNTY, WASHINGTON.

DATED AT CHEHALIS THIS 22ND DAY OF OCT. 1919.

J. F. BERRY, SHERIFF, LEWIS COUNTY,  
WASHINGTON.

By A. H. BROWN, DEPUTY.

STATE OF WASHINGTON }  
COUNTY OF LEWIS } ss.

A F F I D A V I T

C. DELL FLOYD, BEING FIRST DULY SWORN, STATES UPON OATH THAT HE IS THE