

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF OKANOGAN

CAUSE 1981

J. C. KOBEL, Plc.

-vs-

MERRIL M. KOBEL, Def.

IN THE SUPERIOR COURT OF OKANOGAN COUNTY, STATE OF WASHINGTON.

J. C. Kobel,  
Plaintiff.

vs.

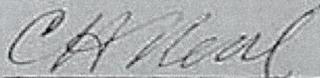
Mertle M. Kobel,  
Defendant.

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SUMMONS.

THE STATE OF WASHINGTON to Mertle M. Kobel said defendant:

You are hereby summoned and required to appear within twenty days after the service of this summons upon you, exclusive of the day of service, and defend the above entitled action in the above entitled court, and serve a copy of your answer on the persons whose names are subscribed to this summons at the address given below their names; and in case of your failure so to do, judgment will be rendered against you according to the demand of the complaint, a copy of which is herewith served upon you.



Attorney for plaintiff,  
Office and Post Office Address;  
Condonully, Washington.

IN THE SUPERIOR COURT OF OKANOGAN COUNTY IN AND FOR THE STATE  
OF WASHINGTON.

J. C. Kobel,  
Plaintiff. :  
vs. : COMPLAINT.  
Mertie M. Kobel,  
Defendant. :  
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Comes now the above named plaintiff and for a cause of  
action against said defendant, alleges:

I.

That he is now and for more than one year last immedi-  
ately past has been a resident of the county of Okanogan, State of  
Washington.

II.

That plaintiff and defendant were married in May, 1904, and now are  
and at all times herein mentioned have been husband and wife.

III.

That the following named children have been born to plain-  
tiff and defendant: Edward W. age five years, Joseph C. age three  
years and Margaret M. age two years.

IV.

That for a long time prior to January, 1911, defendant  
entertained very friendly relations with one James Hale, and visited  
him and permitted and encouraged him to visit her at her home, and  
in the absence of plaintiff; at late hours in the night time and  
during plaintiff's absence; and upon being interrogated by plaintiff  
she, at divers times admitted to plaintiff that the said James Hale  
had visited her in plaintiff's absence. Whereupon plaintiff urged  
and entreated her to cease all relations with the said Hale and live

with plaintiff and their children as a good and dutiful wife and mother should do, whereupon said defendant promised plaintiff that she would cease and refrain from all such conduct in the future; that she continued her friendly relations with the said Hale, but for a time more secretly than before; that during the month of August, 1911 defendant gave birth to a child and claimed to plaintiff that the said James Hale was the father of said child.

V.

That on the 24th day of January, 1912, defendant left plaintiff and their children and went away from their home with the said Jas. Hale taking with them her last born child; that defendant and the said Hale have been and now are residing at the same place, in Okonogan County, and near Oroville.

VI.

That defendant at the time she left plaintiff in January, 1912, informed him that she did not intend to return to him, or the children; and that she has not since returned to visit him or their children.

VII.

That plaintiff was willing to and did many times forgive and bear with defendant's treatment toward him, and her conduct with the said Hale, and used his best and utmost efforts to have her break off her improper conduct and relations with the said Hale; all of this he did in order to keep his family intact and properly care for their said children.

VIII.

That plaintiff has now and at all times has had the custody of their said three children and is and has been supporting them and intends to so continue to do so.

IX.

That plaintiff and defendant own the following property:  
lots 3 and 4 in block 73 in Home Addition to Oroville, worth about  
\$1000.00 upon which is a mortgage for \$400.00 now past due and their  
household and kitchen furniture.

X.

That plaintiff has at all times been a good and true hus-  
band to defendant and labored hard and faithfully to have her prop-  
erly demean herself and assist him in properly rearing their said  
children.

WHEREFORE, plaintiff prays for decree of this court grant-  
ing him an absolute divorce from defendant; that he be awarded the  
care and custody of their said children, and that all of their  
property be decreed to plaintiff and for such other further and gen-  
eral relief as to the court may appear proper and equitable.

*[Handwritten Signature]*

Attorney for plaintiff.

STATE OF WASHINGTON )  
  ) ss.  
COUNTY OF CLATSOP )

J. C. Kobel, being first duly sworn, upon his oath deposes  
and says: That he is the plaintiff in the above entitled action;  
that he has read the above and foregoing complaint, knows the contents  
thereof, and that the allegations therein contained are true as he  
verily believes.

X *[Handwritten Signature]* J. C. Kobel

Subscribed and sworn to before me this 29<sup>th</sup> day of April, 1912.

*[Handwritten Signature]*  
Notary Public.

*Justice of the Peace in and  
for Oroville, Precinct  
Clatsop County,  
State of Washington*

No. 1981

In The Superior Court  
For Okanogan County

J. C. Kobel

Plaintiff

vs.

Mertle S. Kobel

Defendant

COMPLAINT.

NEAL & NEAL  
CONCONULLY, WASH.

ATTORNEYS FOR PLAINTIFFS.

*Filed July 13-1912  
Wm. McClure  
Clerk.*