

Willoughby Tillis of said district, that he has been lawfully married for about six years to his wife Mary Tillis formally Mary Hinson and that during that period he has _____ times behaved himself towards her as a kind and affectionate husband and afforded her all the comforts in his home and acted towards her in all respects as his duty and marital vows & his obligations as a good citizen and husband required, but may it please your Honour, your orator further sheweth that notwithstanding, his said kind and affectionate & dutiful treatment, his said wife Mary voluntarily and without just cause but from her own wilfulness, _____ of the duty of a married woman & forgetful of her vows to your orator _____, left the bed and board of your orator on or about the thirteenth of March in the year one thousand eight-hundred and thirty-seven and left the Territory of Florida and went to reside in Telfair County in the State of Georgia, that your orator has used every means which could _____ a kind & affectionate husband to induce his wife to return, that he has written to her and sent messengers to her urging and _____ her to return and that finding these ineffective he has himself gone in person and conjured her to return to her duties as a wife but in vain, and that she always positively refuses to return, and declared and protested that she never would return and your orator being informed that one year's continued separation is sufficient to entitle him to a divorce under the laws of this Territory; now charges that his said wife Mary up to the time of filing this bill has been continually absent from him without his consent by separation for more than one year and still is so absent; and your orator relying upon the sufficiency of this charge is willing from delicacy to throw a veil over the rest of her conduct and praise your Honour that his said wife is absent from the Territory. Your Honour will graciously make an order of publication requiring her to appear before your Honour's court at the proper time and hence to answer this bill, and that your Honour will be graciously pleased when said order of publication shall have been made for a sufficient length of time and the answer of his said wife is not filed or if filed contains no denial of the allegations in this bill or if containing such denial, it is not sustained by proper testimony to grant to your orator a decree of divorce, a vinculo matrimonii from his said wife Mary and such other and further relief in the premises as to your Honour may deem good and consistent with equity & your conscience.

The following legal ad appeared in The Florida Herald which was published in St. Augustine, Florida:

SUPERIOR COURT--EAST FLORIDA
IN CHANCERY.