

IN THE SUPREME COURT OF ALBERTA

Judicial District of Edmonton.

BETWEEN:-

GEORGE CYRUS CLARK,
Plaintiff,

- and -

IVA GRACE CLARK,
Defendant.

STATEMENT OF CLAIM

1. The Plaintiff resides in the City of Edmonton, in this Judicial District, and is a Travelling Salesman for the International Harvester Company, a Corporation having an office in the said City of Edmonton.
2. The Defendant resides in the City of Edmonton, in this Judicial District.
3. The Plaintiff and Defendant were lawfully married on the 22nd day of December, 1908, at the City of Edmonton, in this Judicial District, in the First Presbyterian Church by the Reverend Doctor McQueen, and the Defendant's maiden name was Iva Grace Spottswood.

4. That after Plaintiff's said marriage with the Defendant the Plaintiff and Defendant lived and cohabited at divers places in the Province of Alberta, to wit, Wetaskiwin, Camrose and ultimately in the said City of Edmonton, in which last mentioned place the Plaintiff and Defendant have resided since the year 1918.

5. That there is and has been no issue of the said marriage.

6. The Plaintiff claims that the Defendant has contrary to her marriage contract and vows in the months of January and February, 1913, and July, 1916, and between the years 1916 and 1918, habitually misconducted herself and lived at times an immoral life at Moose Jaw, Calgary, Wetaskiwin, Edmonton, and Montreal, all in Canada, and in Ogdenburg in the State of New York, one of the United States of America, and has been guilty of gross improprieties and improper association with divers men and at said places has wrongfully and unlawfully cohabited and had sexual intercourse with divers men and committed adultery with certain men, and whose names are well known to the Defendant.

7. That during the past five years the Defendant has on divers occasions departed from the Plaintiff's residence and has given false and untrue accounts of where Defendant had been during her absence from said house, and Plaintiff says that Defendant was at the Apartments or rooms of different male persons in the City of Edmonton during such absences.

8. The Plaintiff further says that the Plaintiff never has and does not condone any of the acts of the Defendant as above recited.

9. The Plaintiff further says that there is no collusion or connivance in this action between the Plaintiff and Defendant to obtain separation and divorce.

THE PLAINTIFF THEREFORE CLAIMS:-

- (a) That Plaintiff be granted a Judgment, decree or order that the Plaintiff's marriage to the Defendant be dissolved.
- (b) Such further and other relief as to the Court or Judge may seem meet and proper.
- (c) Costs.

DATED at the City of Edmonton, in the Province of Alberta, this 18th day of October, A. D. 1918, and DELIVERED by MESSRS. ROBERTSON, WINKLER & COMPANY, Barristers, Etc., Edmonton, Alberta, Solicitors, for the Plaintiff, whose address for service in this action is care of his said Solicitors.

PRECEPT TO NOTE DEFAULT.

REQUIRED the Clerk to enter in the procedure book a note to the effect that the Defendant is in default.

DATED at Edmonton this 4th day of November, A.D. 1918.

ROBERTSON, WINKLER & CO.

TO the Clerk of the
Supreme Court,
Edmonton.

Solicitors for the Plaintiff.