

JUANITA PLATT, COMPLAINANT, }
VS. } IN THE CIRCUIT COURT OF BALDWIN
HARRY PRESTON PLATT, } COUNTY, ALABAMA.
RESPONDENT. } IN EQUITY. NO _____.

TO THE HONORABLE FRANCIS W. HARE, JUDGE OF THE TWENTY FIRST JUDICIAL CIRCUIT OF THE STATE OF ALABAMA. SITTING IN EQUITY.

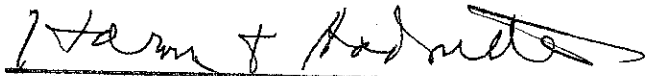
Now comes the Complainant, Juanita Platt, humbly complaining of the Respondent, Harry Preston Platt, in a matter of divorce as will hereinafter appear and represents and shows unto your Honor as follows:

FIRST: That both the Complainant and Respondent are over the age of twenty one years and are both bona-fide residents of Baldwin County, Alabama, and have both so resided for more than one year next immediately preceeding the date of the filing of this Bill of Complaint.

SECOND: That they were married to each other at Lucedale, Mississippi, on, to-wit, the 18th day of December, 1941, and lived together thereafter as man and wife until on, to-wit, the 25th day of February, 1944.

THIRD: That for a long time prior to the 25th day of February, 1944, the Respondent had commenced to treat the Complainant in a cruel and inhuman manner, and without any cause would charge her with infidelity. That she is now in a pregnant condition and the Respondent has accused her of adulterous relations with other men, and has charged that the baby she is now pregnant with is not the product of the union of the Complainant and the Respondent. That she is a woman of high moral character and that such false accusations make her life unbearable with the Respondent and constitute extreme cruelty and that on, to-wit, the 25th day of February, 1944, she ceased to live further with the Respondent as his wife and cannot reside in the same house with him.

to the Complainant an allowance out of the earnings, holdings or estate of the Respondent and that he be required to pay to her at such times and in such amounts as may seem meet and just under the circumstances in this cause permanent separate maintenance.



SOLICITORS FOR COMPLAINANT

JUANITA PLATT,
Complainant,
VS.
HARRY PRESTON PLATT,
Respondent.

IN THE
CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA. IN EQUITY.
CASE NO. 1109.

The bill in this case prays for separate maintenance. After reading and re-reading the testimony, I am of the opinion that it is a case of "Too much mother-in-law". Unquestionably both parties have been more or less to blame, but the Respondent has repeatedly offered to become reconciled with the complainant and do his part by her, which offers the complainant has refused.

The Register will enroll the following decree:

D E C R E E:

This cause coming on to be heard is submitted on the pleadings and proof as noted by the Register and upon consideration of the same, I am of the opinion that complainant is not entitled to relief.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED that the cause be dismissed, without prejudice.

IT IS FURTHER ORDERED that the Complainant be and she is taxed with the cost of this proceeding.

This the 13th day of December, 1944.

J. M. Stare

Judge

JUANITA PLATT,
COMPLAINANT

VS

HARRY PRESTON PLATT
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.

TESTIMONY OF MRS. JUANITA PLATT.

DIRECT EXAMINATION BY MR. HORNE.

Q. What is your name?

A. Mrs. Juanita Platt.

Q. What is your husband's name?

A. Harry Preston Platt.

Q. Where were you married?

A. Lucedale, Miss.

Q. When?

A. December 18th, 1942.

Q. The attached marriage certificate is a true and correct copy
is it not?

A. Yes.

(Mr. Horn here shows marriage certificate to Respondent,
and offers it as exhibit to testimony of Mrs. Platt)

Q. When did you separate, Mrs. Platt?

A. Around the last of February.

Q. About the 25th day of February, 1944?

A. Well, around the last--

Q. Now, prior to the separation in February, had your husband treated
you in a cruel and inhuman manner?

A. Yes.

Q. Did he ever charge you with infidelity?

A. Yes.

Q. At the time you filed the bill of complaint, what was your
physical condition?

A. I was pregnant.

Q. Have you since that time been delivered of a child?

A. Yes.

Q. Is it a girl or a boy?

A. It is a girl.

Q. What is the name of the child?

A. Levelle Sue Platt.

Q. This child is the product of the union of you and the

Respondent?

A. Yes.

Q. Now, on account of his conduct toward you, have you ceased to live with him?

A. Yes.

Q. Can you, with any degree of comfort or safety, reside further with him?

A. No sir.

Q. Mrs. Platt, how much education have you?

A. I finished the 8th grade, and had about two months in the ninth.

Q. Have you ever worked?

A. Yes.

Q. What kind of work?

A. Fountain work, worked in my mother's beauty shop, and Civil Service.

Q. Are you a member of any church?

A. Yes. Presbyterian-- but I do not go regular.

Q. At the present time, is your physical condition good?

A. No.

Q. Are you able to earn your own livelihood at the present time?

A. No.

Q. Have you been compelled to employ solicitors to assist you in this business?

A. Yes. I have.

Q. Have you money with which to pay them?

A. No.

Q. Now, Mrs. Platt, is your husband employed?

A. Yes.

Q. By whom?

A. By Civil Service.

Q. What is his base salary?

A. I don't know-- I was never able to find out---

Q. Well, what are his approximate earnings?

A. Around \$60.00 week-- I think.

Q. Well, do you know about what he made a week?

A. I know at one time it was \$64.00 a week. He did not tell me exactly what he made.

CROSS EXAMINATION OF MRS. JUANITA PLATT BY MR. HALL.

Q. Mrs. Platt, where did you live immediately after you married?

A. Foley.

Q. Did you move to Foley immediately after you married?

A. Yes.

Q. At that time, what did you live in?

A. We lived in a trailer.

Q. How long did you live in the trailer?

A. About two months--- but that was before we moved to Foley--

Q. At the time you moved to Foley, did you purchase a home?

A. No. We rented a log cabin down on the River by Bon Secour

Q. Down at Coopers?

A. No, Duck Inn, it was called--

Q. How long did you live there?

A. Until the first of February.

Q. Did you and your husband get along all right there?

A. Fine.

Q. When you moved from there, where did you move?

A. Moved to my mother's home in Pensacola.

Q. How did you get along while you lived in your mother's home in Pensacola?

A. Fine.

Q. How long did you live there?

A. Until the first of April, 1943.

Q. Then, where did you move?

A. Foley.

Q. Did you rent a house there?

A. Yes.

Q. Did you buy a home?

A. No.

Q. Did you get along all right in Foley?

A. No, sir.

Q. When did the disagreement between you first arise?

A. It was right after we moved back to Foley,

Q. What was the occasion for the trouble?

A. I think the first trouble we had was out in the garden. The horses got out, ran over the garden-- I cussed the horses, and he slapped me down.

Q. Then did you have many difficulties after this?

A. I packed my clothes and asked him to take me home, and he told me "Absolutely not". He said his car would not take me home.

Q. At that time you wanted to go home, and asked him to take you, he would not?

A. No.

Q. Did you leave him then?

A. No.

Q. Did you stay on?

A. Yes.

Q. How long?

A. Until May, 1943.

Q. After that time, did you have any trouble with him?

A. Yes, off and on.

Q. Did he strike you at any other time?

A. Well, he tore my clothes off.

Q. What for?

A. Because I was going to get up and go home one night--

Q. That was in the middle of the night?

A. Yes.

Q. You wanted to get up in the middle of the night and go home?

A. Yes, and in order to prevent me from going he tore my clothes off.

Q. You were pregnant then?

A. Yes. About six months.

Q. And he would not let you get out in the middle of the night?

A. No.

Q. Is that the only mistreatment you received?

A. Yes, physically.

Q. Did he ever at any time strike you after that?

A. No.

Q. When did you go home after that?

A. Well, I stayed three days after that.

Q. Stayed as his wife?

A. Yes.

Q. Was he maintaining a home, and supplying you with food?

A. Yes.

Q. Did he supply you with clothes?

A. Few.

Q. After this first time he struck you or slapped you, you went home?

A. I had gone home before this last time ----

Q. In the meantime, you had left him and gone home?

A. Yes.

Q. And came back of your own accord?

A. Yes.

Q. He did not mistreat you any more until this night he tore your clothes off?

A. When I went home this last time, after the misunderstanding came up, I had told him I was nervous, and had to go home for a rest--

Q. He did not send you home?

A. No.

Q. Did he ever refuse to furnish you with food or clothes?

A. No.

Q. Did he furnish you with a doctor if one was necessary?

A. Well, he told me he did not have \$5.00 for a doctor, that \$5.00 was all he had, and he was going to keep the \$5.00--

Q. Did he mistreat you at that time?

A. I would call it that--

Q. Did he strike you then?

A. No.

Q. Did you ever go wanting for any food or clothes?

A. No.

Q. Were you permitted to go out as the other married women around you were?

A. There was no place to go.

Q. Did you use the automobile?

A. Seldom. He took the car to work.

Q. But you did use the car?

A. Until one time I went to the doctor, and was late getting back--

Q. At what time did you get back?

A. About 9:30, and he was so mad--

Q. Was anyone with you?

A. No.

Q. In other words, your husband complained when you took the car away alone and stayed away until 9:30 at night?

A. Yes. I had gone to Dr. McLain in Pensacola--

Q. Is that the month ever mistreated you in regards to the car; complained you were in Pensacola at night and did not get back?

A. Until one time after that, I got back at 10:10. There was a friend with me that time. All was as nice as pie-- he was very cordial to her, and we took her home. When we got back there was quite a big paw-wow about my being out late with her. He even had something to say about her--

Q. You had gone to the doctor?

A. Yes, I had gone to Dr. Mach that time--

Q. At that time, you were six or eight months pregnant?

A. Not quite, five or six months.

Q. And he got mad because you went and did not come in until after ten o'clock. Did he strike you then?

A. No. He made quite a few remarks about our going to picture shows, and such.

Q. Mrs. Platt, you charge here that he charged you with infidelity?

A. Yes. He did not believe my baby was his.

Q. When did he tell you that?

A. After I had gone home two or three times.

Q. After then, did he try to keep you from going to Pensacola?

A. Well, he asked me if I was going to stay.

Q. Did he ask you to stay?

A. Yes, he told me to pack my clothes and get the hell out.

Told me if I did not like the way things were going, I could get out.

Q. He was providing for you to the best of his ability?

A. No.

Q. I mean, did he provide for you in line with what most of the

other young married people around you had?

A. Well, he never did give me any money. He went with me to the grocery store, and he paid the bills himself-- never gave me any money. I don't know why he did this, because I am sure I was not raised that way, and neither was he. I asked him why it was that way-- I could see no sense in it.

Q. Did he ever accuse you of being unfaithful to him with any particular person?

A. No. He just told me he did not think my baby was his.

Q. Since that time, he has offered to provide you with a home?

A. Well-- he did not offer me anything. He asked me what would I do if he bought one. I told him I would take as good care of it as I did the Carwell place, where we lived in Foley. I took care of that all right. I varnished the floors while he sat up and watched me, and cooked all the meals for him and his two children.

Q. Mrs. Platt, at the time you left Foley, you had a home with him there?

A. Well-- I had five closets in a housing project.

Q. But he kept up the rent?

A. Yes.

Q. He every week brought in the groceries?

A. Yes.

Q. Well, did you not enjoy life as a normal individual?

A. No.

Q. What was the main source of trouble between you and Mr. Platt?

A. I think it was when it got to the point that every time I went to the doctor or dentist, he said it was only an excuse to get to Pensacola. He never seemd to believe or care what the doctor said. When the doctor said I was headed for a nervous breakdown, he sat down in the floor and laughed.

Q. In other words, you craved sympathy?

A. No. I just wanted some of the things of life--

Q. Do you know whether he still maintains a home in Foley?

A. The last time I called him, he said he did.

Q. He was still keeping a home open for you to come back?

A. I think it was open. I do not know if he ever tried to get me to come back.

RE-DIRECT EXAMINATION OF MRS. PLATT BY
MR. HORN:

Q. Mrs. Platt, since you have been in Pensacola, or since you have been separated, has he furnished you with any of the necessities of life?

A. Absolutely not.

Q. During that time have you not given birth to a child?

A. Yes, sir.

Q. I will ask you the details of your expenses in connection with the giving birth to this child.

A. The doctor's bill was \$80.00, Lab fee \$5.00, X-ray \$10.00, Hospital \$58.55, ambulance \$5.00, nurse \$84.00.

Q. Did your husband ever offer to pay these bills?

A. He agreed to pay all those bills.

Q. Did he ever pay them?

A. No.

Q. Have they been paid?

A. Some of them had to be paid. The Pensacola Hospital does not let you out unless they are paid.

Q. He knows you were having the baby?

A. Yes.

Q. Knew about when the baby was expected?

A. Yes.

Q. Did he ever refuse to get the doctor for you when you were sick?

A. He refused to buy medicine--

Q. He refused to buy medicine on the prescription the doctor gave you?

A. Yes. Dr. McLain gave me a prescription for headaches. I told him I needed the prescription filled, and he said he did not have the money, to wait until the next day. That night, though, his children had money to go to the picture show.

CROSS EXAMINATION OF MRS. PLATT BY MR. HALL.

Q. Mrs. Platt, where is your home now?

A. Pensacola.

Q. You have definitely established that as your home?

A. I am staying there, I guess that is establishing it. It is the only home I have to go to.

DIRECT EXAMINATION OF HARRY PRESTON PLATT, BY
MR. HALL.

Q. Mr. Platt, do you live in Foley, in Baldwin County, Alabama?

A. Yes.

Q. Do you maintain a home there?

A. Yes.

Q. Where is it?

A. 426 Azalea Apartment, Federal Housing Project.

Q. Is that where you lived at the time your wife left you?

A. Yes.

Q. Is that a furnished apartment?

A. Partly furnished. We furnished the rest of it.

Q. Have you continued at all times to maintain this apartment since your wife left you?

A. Yes.

Q. Since your wife left you, have you communicated with her by mail, or telephone?

A. Yes. Mail, telephone, and went to see her.

Q. Did you, on these occasions when you wrote her or when you called her, ask her to come back?

A. Yes.

Q. You have asked her a number of times to come back and live with you?

A. Yes.

Q. During the time you were living in Foley, did you provide her with the necessities of life?

A. Yes. I went with her to the grocery store every single day. She bought what she wanted to buy, and I paid for them.

Q. You went every day, or every time she told you she wanted anything?

A. Yes. Went every day.

Q. At that time, did you have an automobile?

A. Yes.

Q. Did you permit her to use the automobile at reasonable times?

A. I did until the first or second time she went to Pensacola, and I asked her to be back before dark, and she did not. I found that they were going to the picture show after they had seen the doctor, and did not get back until after dark. I argued with her about it, and she told me -- can I say what she told Me?

(Mr. Hall tells him to go ahead) She told me to take the automobile and ram it up my ass. I told her then that she did not use the car any more to go to Pensacola. If she went she would make other arrangements, then her mother butted in and told me she was going to bring her car over for her to use.

Also, the money proposition. She handled the money for several weeks, and we never had anything.

Q. Did you bring the pay checks to her?

A. For three or four weeks.

Q. And you did not get any back?

A. No. I did not ask for any.

Q. Mr. Platt, she says here that some time ago in the garden you slapped her down.

A. I did not draw back to slap her. When she cussed, she cussed at me. She called him G-- D--- S-- B---, and I grabbed her in the throat and pushed. Later on, she said she was cussing the horses, not me.

Q. Did you strike her?

A. That was the only time I ever laid hands on her.

Q. Now lets come down to the time she said you tore her clothes off.

What about that?

A. She was going to get up and leave, and I told her she was not going to leave until the next day.

Q. Then what happened?

A. She did not leave. She went back to bed and stayed there. The next day she left. After that, she came back and stayed a day and a half while I was sick, and she left me sick in bed.

Q. Mr. Platt, did you ever refuse to furnish her medicine when she was sick?

A. No sir. I think if you will check with Dr. Stacy in Foley, you will find that she had the prescription filled the time she said I would not get the medicine. I told her, if she will remember, that if she sent me the prescriptions I would get the druggist to call her doctor in Pensacola to get them OK'd and he would fill them for her.

Q. Mr. Platt, did you ever refuse to furnish her with food, clothes, medicine, or doctor's attention while she was in Foley?

A. I asked her to go to Dr. Frank , or to Mrs. Holmes. She did not have to go to Pensacola, to the doctor there.

Q. Mr. Platt, did she notify you when the baby was to be born?

A. No.

Q. Did she write you to come over to see the baby?

A. No. about two weeks after the baby was born, I heard about it through one of the men working at the Field. It must have been more than three weeks when I got a letter from her telling me I could come see the baby.

Q. Have you ever seen the baby?

A. No.

Q. Mr. Platt, have you tried to get her to come back?

A. Not since the baby was born.

Q. Before that time, did you?

A. Yes.

Q. On how many occasions?

A. I do not remember exactly how many. I went to Pensacola to see her, got there at about 7:00 o'clock in the morning, and tried to talk to her. Her mother would not even let me talk. Told her not to tear down what she had built up. She was not to go to Foley, and live in Foley.

Q. Mr. Platt, have you just recently offered to take her and provide a home for her and the child?

A. I have, today.

Q. Did she accept this offer?

A. She refused it.

Q. Mr. Platt, are you willing to accept her back, with the child, and care and provide for her and the child to the best of your ability, and furnish them with a home?

A. Yes, I am

Q. Mr. Platt, she charges here that you charged her with infidelity. Did you ever charge her with illicit relations with any one?

A. No. I told her after she left and went back to her mother that time that the baby would not belong to me, that I would not have the first thing to say about it.

Q. Did you tell her that you were not the father?

A. I never did. I just told her from the way she was acting, the baby would not be mine.

Q. Mr. Platt, she mentioned something about the expenses attending the birth of this child. Did she ever ask you for any money?

A. She told me she thought I ought to give her mother some money to help run the place.

Q. Did you offer her any?

A. No. Not since her mother came and got her. She was to come back the next day.

Q. Have you offered to pay the expenses of this birth?

A. I have not offered anything, only the offers I have been making through you and Mr. Horn. I talked with her about the money, and she said she did not need any money, her mother had plenty. She did not want money.

CROSS-EXAMINATION OF MR. PLATT, BY MR. HORN.

Q. What is the nature of your employment?

A. I am a machinest, at Barin Field.

Q. Are you a union man?

A. I was, but there is no union there.

Q. Are you employed under Civil Service?

A. Yes, sir.

Q. Do you have a base pay?

A. Hourly rate.

Q. What is that at the present time?

A. \$1.26 hour.

Q. What is over time?

A. \$1.89, one day a week.

Q. Are you regularly employed?

A. Yes, Sir. I was until I was sick.

Q. What are your approximate earnings?

A. I draw, after they take out all deductions, income tax, etc., \$53.45 per week.

Q. Now, did you not inform your wife, when she told you what these hospital bills were, over the telephone--

A. I have never talked to her over the telephone since the baby was born. She never told me---

Q. Did she not tell you what they were before the baby was born?

A. She has not.

Q. You have heard them today, have you not?

Q. Do you not find them reasonable?

A. No.

Q. Why not?

A. I do not understand a hospital bill, and a nurse on top of that.

Q. Well, you understand that was a special nurse, do you not?

A. Well, I do not know.

Q. I will ask you to examine that bill, and see if that says special nurse.

A. No sir, it says--

Q. Well, here, it says special nurse, \$54.00. Do you understand what that means?

A. No, I do not particularly understand.

Q. You knew that your wife had a miscarriage with the other child?

A. No, sir.

Q. Do you not know she had trouble then?

A. No, sir.

Q. Well, how long did the child live?

A. Ten days.

Q. Was the child born in the hospital?

A. It was born in Maternity home.

Q. Where?

A. In Pensacola.

Q. You were married to Mrs. Platt then, were you not?

A. Yes.

Q. This is your marriage license or certificate? (Hands paper to Platt)

A. Yes, sir.

Q. The child born to her is your child, so far as you know?

A. So far as I know.

Q. You did tell her you did not believe it, did you not?

A. I told her from the way she was acting, I did not believe it.

Q. You charged her with relations with other men, in getting that child?

A. I did not charge her with anything.

Q. But you did tell her you did not believe it was your child?

A. After she left me, and we separated, I told her from the way she was acting it was not my child.

RE-DIRECT EXAMINATION OF MRS. PLATT
BY MR. HORN.

Q. Mrs. Platt, what was the state of your health at the time of the birth of your other child?

A. It was not good. I had just lost my first husband about a year before and had not been well since. I was very nervous and upset.

Q. Were you under the doctor's care?

A. No, I was not. Not all the time.

Q. Now, you called on your husband to pay these hospital bills and doctor's bills since you have been separated?

A. I called Preston every time any communication was made. He never called me. He came over to the house one morning, that is true enough. The statement he made that mother told me not to tear down what I had built up referred to my health, and not anything she had told me, as he said, During the day he said he asked me to come home. He asked me that day if I would give him a divorce.

Q. Can you, with any degree of comfort, ever live with Mr. Platt any more?

A. I do not see how there could be any comfort-- if he has not even offered to see the baby. I do not see how there could be any comfort to be had with him. If he could not treat me human while I was with him, I do not see how I could expect it now.

Q. Are your feelings so that you feel he does not have the confidence in you he should have?

A. I do not think he has any confidence in anybody.

Q. You are not willing to try to live ^{with} him further, under the circumstances?

A. No.

CROSS-EXAMINATION OF MRS. PLATT BY MR. HALL.

Q. Mrs. Platt, that time you left him, or left his home to go to Pensacola, you promised to come back?

A. That is right.

Q. You did not let him hear from you directly or indirectly for about ten days?

A. It was not ten days. I went over on Sunday night. I guess it

was about a week. And when I did come home, I told him I was not able to make the trip.

Q. Did you see the doctor?

A. The doctor was out of town.

Q. Mrs. Platt, Mr. Platt has offered to bury the hatchet, and effect a reconciliation, and that he would pay all expenses, and provide for you as best he could, has he not?

A. Yes.

Q. Have you refused?

A. Yes.

JUANITA PLATT
COMPLAINANT

VS

HARRY PRESTON PLATT
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

It is agreed by and between the parties that the testimony may be taken down in writing by Bernice F. Reid as Commissioner, and the signing of the testimony by the witnesses is waived by the parties.

Horne & Hadnette
Solicitors for the Complainant

Barnes & Lane
Solicitors for the Respondent.

RECORDED

Rever

15-1944
1944

JUANITA PLATT, COMPLAINANT

VS

HARRY PRESTON PLATT, RESPONDENT

STIPULATION
AS TO APPOINTMENT OF COMMISSIONER
TO TAKE TESTIMONY AND SIGNING OF
TESTIMONY BY WITNESSES.

Done Dec 10 00

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, (1109)
BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

May. TERM, 1944

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Harry Preston Platt.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Harry Preston Platt., Respondant.

by Jaunita Platt.

Complainant.

Witness my hand this 4th day of May. 1944

[Signature] Clerk.

STATE OF MISSISSIPPI

MARRIAGE LICENSE
COUNTY OF
GEORGE

To any Judge, Minister, Justice or any other Person Lawfully authorized to celebrate the Rites of Matrimony.
YOU ARE HEREBY LICENSED TO CELEBRATE THE
RITES OF MATRIMONY
BETWEEN

Mr. Harry P. Platt and

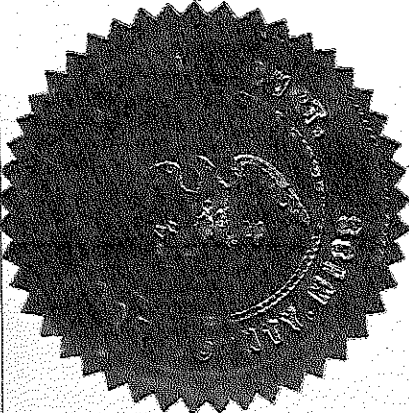
Mrs. Juanita Shirley Gipson Humphreys

and for so doing this shall be your warrant
Given under my hand and official seal, this the
18th day of December

in the year of our Lord One Thousand Nine Hundred
and Twenty Two

M. L. Malone Circuit Clerk.

By A. Lavett D.C.



The State of Mississippi, } By Virtue of A License
COUNTY OF GEORGE

From the Clerk of the Circuit Court of said County of GEORGE I have
this day celebrated the Rites of Matrimony between

Mr. Harry P. Platt and

Mrs. Juanita Shirley Gipson Humphreys

Given under my hand, this the 18th day of December A.D. 1942

Andrew Bayles, m.d. (Seal)



MARRIAGE LICENSE
AND CERTIFICATE

AND

STATE OF MISSISSIPPI



County of George

Issued Dec. 18th, 1942

Married Dec 18th, 1942

License Recorded Dec 18th, 1942

Marriage Record 9 Page 281

M. L. Malone
Circuit Clerk.

By S. L. Luvant, D. C.



BILLS PRESENTED WEEKLY

PENSACOLA, FLA. 6/20/44 194

M. Harry P. Platt for Mrs. Juanita Platt

3020 W. Gadsden St.

Room No. 306

PENSACOLA HOSPITAL PENSACOLA, FLORIDA

	TO HOSPITAL ROOM AND CARE FROM <u>6/15/44</u> TO <u>6/20/44</u>				
5 days	AT \$ 8.00 PER DAY	40	00		
	OPERATING ROOM FEE	10	00		
	ANESTHETIC				
	X-RAY				
	CAST				
	LABORATORY FEE & PATH. EXAM.	2	50		
	DRESSINGS	1	00		
	DELIVERY ROOM FEE	10	00		
4 days	CARE OF BABY	4	00		
	SPECIAL MEDICINE	1	05		
	TOTAL	\$ 58	55		

BILLS PAYABLE ON PRESENTATION
 REPORT ANY INACCURACIES AT OFFICE PROMPTLY
 RECEIVED PAYMENT PENSACOLA HOSPITAL

DATE _____ BY _____

C. C. WEBB, M. D.
 A. E. MOCK, M. D.
 C. J. HEINBERG, M. D.
 A. W. WHITE, M. D.
 LEE SHARP, M. D.
 E. T. WHITE, Jr., M. D.

THE MEDICAL CENTER

24 WEST CHASE STREET
 PENSACOLA, FLORIDA
 PHONE 3181

IN ARMED FORCES
 W. P. HIXON, M. D. (USNR)
 E. V. ANDERSON, M. D. (USNR)
 G. W. MORSE, M. D. (USA)

MRS. H. P. PLATT
 3020 W. GADSDEN ST
 CITY

Statement of Your Account for Month Ending 28th

JUNE

19 44

Pay Last
 Amount
 in This
 Column

DATE	ITEMS	CHARGES	CREDITS	BALANCE
	BALANCE FORWARD			.00
6-16-44	DR. MOCK LAB	75.00 5.00		80.00
	<i>Special Nurse</i>			<i>84.00</i>
	<i>two weeks</i>			
	<i>Amulance</i>			<i>5.00</i>
MEMBER MERCHANTS CREDIT BUREAU				

Jaunita Platt.

VS.

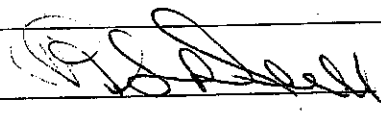
Harry Preston Platt.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
and ^Testimony of Complainant.

and in behalf of Defendant upon ^Testimony of Resopondant.

 Register.

No. 1109.

The State of Alabama,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

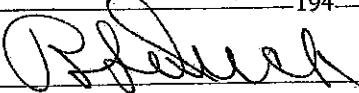
Jaunita Platt,

VS.

Harry Preston Platt,

NOTE OF TESTIMONY

Filed in Open Court this 17th
day of November. 194



Register.

JUANITA PLATT, COMPLAINANT

VS

HARRY PRESTON PLATT, RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

And now comes the Respondent, and demurs to the Complainant's bill of complaint in this cause, and for grounds thereof, says:

1.

That said bill is without equity;

2.

And the Respondent, specially demurring to Count THIRD of the said Complaint, says:

(1) that said count sets out no legal grounds authorizing a divorce;

(2) That the allegation of cruelty is but the conclusion of the pleader.

(3) That said count does not state that said acts endangered the life and health of the complainant.

JUANITA PLATT,

Complainant,

VS

HARRY PRESTON PLATT,

Respondent.

DEMURRERS

1109

Filed this the 12 day of May, 1944.


Register