

The State of Alabama, { Circuit Court of Baldwin County, In Equity.
Baldwin County. }

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Bertha M. Riel,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a ~~Bill of Complaint~~ ^{PETITION} lately exhibited by

J. George Riel

against said Bertha M. Riel

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, M. A. Stone, Register of said Circuit Court, this 7th day of December, 193 3

M. A. Stone Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

9

BERTHA M. RIEL
Complainant.
VS

J. GEORGE RIEL
Respondent.

ANSWER
TO PETITION
AND
CROSS PETITION

Filed January 17, 1934

Wm. A. Stone

Rigates

WILLIOTT G. RICKARBY
LAWYER
FAIRHOPE, ALABAMA

CIVIL SUBPOENA—ORIGINAL—In case witness shall wish to charge for attendance, he shall produce to the Clerk in term this Subpoena, or within five days after adjournment of Court, else he will be barred.

Gill Ptg. & Sta. Co., Mobile—Re-Order No. 720

THE STATE OF ALABAMA }
BALDWIN COUNTY

S.D. Page No.

CIRCUIT COURT

Case No.

Jan.

Term, 193*4*

To any Sheriff of the State of Alabama, GREETING:

You are hereby commanded to summon

Miss. Shaff

if to be found in your County, at the instance of the

Plaintiff

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof,

by *10* o'clock of the forenoon, on the *29* day of *Jan.* 193*4*

and from day to day and term to term of said Court until discharged by law, then and there to testify, and the truth to

say, in a certain cause pending, wherein

George J. Reil

Plaintiff

and *Bertua M. Reil* Defendant.

Herein fail not and have you then and there this Writ.

Given under my hand and seal, this *29* day of *Jan.* 193*4*.

W. A. Stone

Clerk.

BERTHA M. RIEL,)
Complainant.) CIRCUIT COURT, BALDWIN COUNTY?, ALA.
Vs.) In Equity.
J. George Riel,)
Respondent.)

This cause is submitted on the petition of the respondent seeking a modification of a decree of divorce rendered in said cause on August 2nd, 1933, insofar as said decree affects the custody of the minor children of the parties, and also seeking an order commanding the said Bertha M. Riel not to remove the said children from the jurisdiction of this Court pending the hearing of said petition for the modification of said decree.

Upon consideration of said petition it is ordered and adjudged by the undersigned, as Judge of said Court, that said Bertha M. Riel be, and she hereby is, ordered and commanded to refrain from removing said children from the jurisdiction of this Court pending the hearing of the petition for the modification of said decree above mentioned.

It is further ordered that said petition be set down for hearing at Bay Minette, Alabama, at the Court house, at 10 A. M. on Monday January 29th, 1934, and that a copy of this order be served on said Bertha M. Riel by the Sheriff.

This December 29th, 1933.

J. W. Hare
Judge.

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

710.9.

Bertha M. Riel
vs.
J. George Riel

PLAINTIFF

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
Fees of Register			AMOUNT BROUGHT FORWARD	3	90
Filing each bill and other papers	\$	10	For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.		
Issuing each Subpoena		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof		30	Each Notice Sent by Mail to Creditors		15
Entering each return thereof		15	Filing, Receipting for and Docketing each Claim, etc		25
For each Order of Publication		1 00	For all entries on Subpoena Docket, etc.		50
Issuing Writ of Injunction		1 50	For all entries on Commission Docket, etc.		50
For each Copy thereof		50	Making Final Record, per hundred words		15
Entering each return thereof		15	Certified Copy of Decree	1	00
Issuing Writ of Attachment		1 00	Report of Divorce to State Health Office		50
Entering each return thereof		15	Acts 1915		
Docketing each case	1	00	Total Fees of Register	5	90
Entering each Appearance		25			
Issuing each Decree Pro Confesso on personal service		1 00	FEEES OF SHERIFF		
Issuing each Decree Pro Confesso on publication		1 00	Serving and Returning Subpoena on Deft.	\$	1 50
Each Order Appointing Guardian		1 00	Serving and Returning Subpoena for Witness		65
Any other order by Register		50	Levying Attachment		3 00
Issuing Commission to Take Testimony		50	Entering and Returing same		25
Receiving and Filing		10	Entering and Returning Execution		25
Endorsing each package		10	Selling Property Attached		25
Entering Order Submitting Cause		50	Impaneling Jury		75
Entering any other Order of Court		25	Executing Writ of Possession		2 50
Noting all Testimony		50	Collecting Execution for Costs		1 50
Abstract of Cause, etc.		1 00	Serving and Returning Sci. Fa., each		65
Entering each Decree		75	Serving and Returning Notice		65
For Every Hundred Words Over Five Hundred		15	Serving and Returning Writ of Injunction		1 50
Taking Account on Reference		3 00	Serving and Returning Writ of Exeat		1 50
Taking Testimony, etc.		15	Taking and Approving Bonds, each		1 00
Each Report, Five Hundred Words or less		2 50	Collecting Money on Execution		
For every Hundred Words Over Five Hundred		15	Making Deed		2 50
Amount Claimed, Less than Five Hundred Dollars, etc.		2 00	Serving and Returning Application		1 00
Issuing each Subpoena		25	Serving Attachment, Contempt of Court		1 50
Witness Certificate, each		25	TOTAL FEES OF SHERIFF		1 50
Issuing Execution, each		75			
Entering each Return		15	Recapitulation		
Taking and Approving Bond, each		1 00	Register's Fees		5 90
Making Copy of Bill, etc.		15	Sheriff's Fees		1 50
Each notice not otherwise provided for		50	Commissioner's Fees		
Each Certificate or Affidavit, with Seal		50	Solicitor's Fees		
Each Certificate or Affidavit, no Seal		25	Witness Fees		
Hearing and passing on application for Receiver or Trustee		3 00	Guardian Ad Litem		
Each Settlement with Receiver or Trustee		3 00	Printer's Fees		
Examining each Voucher of Receiver or Trustee		10	Trial Tax		3 00
Examining each Answer on Exception		3 00	Recording Decree in Probate Court		3 00
Recording Resignation or Suggestion of Death of Trustee		75			
Entering each Certificate to Supreme Court		50	Total		10 40
Taking Questions and Answers, etc.		25			
For all other service relating to such proceedings		1 00			
For service in proceeding to relieve minors, etc. same fee as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward	3	90			

Received payment this _____ day of _____ 193_____

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs. Register.

1/30/34

STATE OF ALABAMA |

MOBILE COUNTY |

Before me, Celia Gerhardt, a Notary Public in and for said State and County, personally appeared J. George Riel, who on oath says that he has read over the foregoing petition and that the matters stated therein are true and correct to the best of his information and belief.

Mr. J. George Riel

Subscribed and

sworn to before me

this 4th day of December,

1933.

Celia Gerhardt

9

BERTHA M. RIEL,		
Complainant,		
vs		IN EQUITY
J. GEORGE RIEL,		CIRCUIT COURT OF
Respondent		BALDWIN COUNTY, ALABAMA.

Comes the Respondent, J. George Riel, and respectfully shows unto this Honorable Court as follows:

Heretofore on to-wit the 2nd day of August, 1933, a Decree of Divorce was rendered at the complaint of Bertha M. Riel against this, your Petitioner, J. George Riel, under the terms of which the custody of George C. Riel, Betty Mae Riel and Robert John Riel, all minor children of the said Bertham M. Riel and J. George Riel, was awarded to the complainant, the said Bertha M. Riel.

This petitioner, who was the respondent in said cause, respectfully shows unto this Honorable Court that the said Bertham M. Riel is unmarried since said divorce and is unmarried on this the 4th day of December, 1933.

This petitioner further shows unto this Honorable Court that the said Bertha M. Riel is not a suitable person to have the charge and custody of said children and that the well being and proper rearing of said children requires that the custody of said children be given to this, your Petitioner, J. George Riel, who is the father of said children.

As grounds for this petition, your petitioner respectfully shows unto this Honorable Court that the said Bertha M. Riel has lived in adultery, subsequent to the time that she and the said J. George Riel separated, with a person or persons unknown to your petitioner.

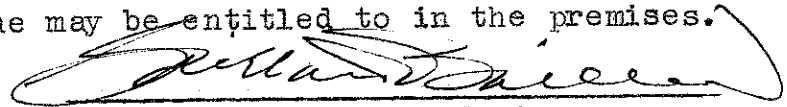
Your petitioner is informed and believes, and on such information and belief states that Oswald Lawrence is one person with whom the said Bertha M. Riel has so lived. Your petitioner further represents that the said Bertha M. Riel is an expectant mother but that he does not know the father of the expected child.

Your petitioner is able to properly care for and rear such children and is a suitable person to have the custody of such children.

Your petitioner is informed and believes and on such information and belief says that the said Bertha M. Riel is preparing to leave the State of Alabama and to remove such children from the State.

P R A Y E R

Your petitioner represents that on these grounds the said Bertha M. Riel is an unfit and unsuitable person to have the custody and care of said children and prays this Honorable Court to take away the custody of said children from the said Bertha M. Riel and give the custody of said children to your petitioner, J. George Riel. Your petitioner prays that this Honorable Court immediately issue an order prohibiting the said Bertha M. Riel from removing the aforesaid three children from the State of Alabama, and prays for such other, further, different or additional orders as he may be entitled to in the premises.


Attorneys for Respondent.

BERTHA M. RIEL
Complainant

EQUITY

CIRCUIT COURT OF

vs

BALDWIN COUNTRY, ALABAMA

J. GEORGE RIEL
Respondent

Comes BERTHA M. RIEL, Complainant in the above styled cause and Respondent to the petition filed on December 6th, 1933 by J. GEORGE RIEL, the original Respondent, and shows that she should not be required to answer the allegations of said petition at this time for the reason that the said J. George Riel is not entitled to present said petition because he is willfully in contempt of the mandate of this Honorable Court and not entitled to any relief therefrom until purged of such contempt. Said acts of contempt are as follows:

FIRST: The decree of divorce heretofore rendered in this cause on August 2nd, 1933, ordered the payment by said J. George Riel of the sum of \$7.00 per week to Complainant for the support and maintenance of the three infant children of the marriage, who are now being supported by Complainant with the aid of her parents. The payments so ordered are in arrears since the month of November last.

SECOND: The said J. George Riel is further in contempt in that he has not paid Complainant's solicitor's fees in full as ordered by the terms of said decree even though an arrangement had been made by which these fees could be paid in monthly installments.

THIRD: The said J. George Riel has not paid the costs of this cause taxed to him though said cause was concluded August 2nd, 1933 and because of such non-payment the Register of this Court is now making demand upon Complainant for same.

FOURTH: The decree of divorce aforesaid rendered August 2nd, 1933 contains the following clauses:

"IT IS FURTHER ORDERED that J. George Riel be and he hereby is permitted to again contract marriage after payment of the costs of this cause and of all amounts due to be paid under the terms of this decree in full up to the time of said marriage, but such future marriage shall not release Respondent from any liability for the support of his children as hereinabove provided.

"IT IS FURTHER ORDERED, ADJUDGED AND DECREED that

neither party shall marry again, except to the other until the expiration of sixty days from this date - - - "

Nevertheless, in deliberate disobedience and contempt of the foregoing order the said J. George Riel on August 16th, just fourteen days after the rendition of said decree, sought to contract marriage and went through a marriage ceremony with one Emma Manteuffel in the city of Pascagoula, Mississippi, and immediately returned to Mobile where Complainant is informed he now lives with her as husband and wife though said marriage is not a legal marriage under the laws of the State of Alabama being forbidden by the terms of the divorce decree and hence bigamous as was adjudged in the recent case of Vance vs State, 210 Alabama 9, 97 Sol 230.

Complainant submits that the attempted second marriage and the fact that J. George Riel is steadily employed shows that his failure to pay the Court Costs and the support of his children is a contemptuous disregard of the orders of this Court and not due to financial inability.

FIFTH? Complainant further shows that the charges against her set out in said petition are grave and involve the vital questions of her good name of the custody of their three infant children; that she is without means to recompense counsel to represent her and refute this charge and that the amount of counsel fees heretofore allowed her, even if paid, are entirely inadequate to cover the services required for the defense of the grave issues presented by the recent petition and not contemplated when the divorce suit was filed.

Complainant therefore prays that an order of reference be made forthwith to ascertain a proper amount to be allowed her for legal representation in the present proceedings; that an order be made for the payment by Respondent of such counsel fees when so ascertained and that he be restrained from proceeding further under this petition until said additional counsel fees and all arrears of alimony, former counsel fees and Court Costs are paid in full, at which time Complainant will then answer the allegations of the petition upon their merits. She further prays that she be not required to make such answer until after proper disposition by the Court of the matters here set out.

Complainant further prays that an order be issued forthwith

citing the said George Riel to show cause why he should not be held in contempt for his deliberate disobedience of the several orders of this Court herein set out.

Complainant further prays that she may have such other further or different orders and decrees as she may be entitled to in the premises.

Bertha M. Riel

William S. Rickard
Solicitor for Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary, personally appeared this day Bertha M. Riel, who being sworn says that she knows of her personal knowledge that the allegations of the foregoing answer and cross-petition are true except the allegations as to the alleged second marriage of George Riel, of which she has been reliably informed and which she believes to be true.

Given under my hand this the ¹⁷ day of January, 1934.

Bernice S. Falmar

Notary Public, Baldwin County, Alabama.

BERTHA M. RIEL,

Complainant,

vs

J. GEORGE RIEL,

Respondent.

|

|

| IN CIRCUIT COURT OF

| BALDWIN COUNTY, ALABAMA.

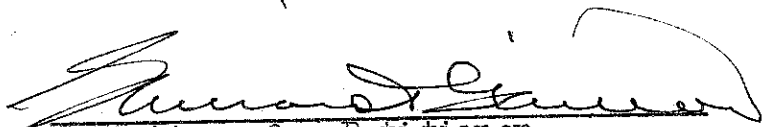
|

| In Equity.

|

Comes the Petitioner and amends his petition for rehearing, by amending Paragraph Three, by making the first sentence of such Paragraph Three read as follows:

Petitioner represents that over four years ago your petitioner was indicted for burglary and that the charge was changed to petty larceny, and your petitioner plead guilty to the charge of petty larceny and was fined 1¢ and costs.


Solicitors for Petitioner.

BERTHA M. RIEL, |
 Complainant, | IN CIRCUIT COURT OF
 vs | BALDWIN COUNTY, ALABAMA.
 J. GEORGE RIEL, |
 Respondent. | IN EQUITY.

Comes your petitioner, J. George Riel, and moves this Honorable Court to grant a rehearing of the petition heretofore filed by this petitioner for the custody of the minor children, and as grounds for said motion, sets forth and alleges the following facts:

One

Your petitioner represents that subsequent to the date of the decree rendered on August 2nd, 1933, your petitioner has earned the following amounts:

For the month of August, 1933	the sum of	\$45.00
For the month of September, "	" " "	50.00
For the month of October, 1933	" " "	79.00
For the month of November, 1933	" " "	63.00
For the month of December, 1933	" " "	34.00
For the month of January, 1934	" " "	46.00
Total.....	\$	<u>318.00</u>

Your petitioner further shows that he paid to the Juvenile Court of Mobile County, Alabama, for the support of said minors during said time as follows:

August, 1933,	the sum of.....	\$13.00
September, 1933	" " ".....	15.00
October, 1933,	" " ".....	20.00
November, 1933	" " ".....	18.00
January, 1933	" " ".....	23.00

In addition to these sums, your petitioner shows that he has paid to E.G. Rickarby, Attorney for Bertha Riel, as attorney's fees in the said divorce case the sum of \$35.00.

Your petitioner further shows that he has also paid court costs in the sum of \$16.90.

This makes a total of over \$140.00 paid since August 2nd, 1933, on account of the divorce proceedings in which Bertha Riel, Mother of the children, was complainant.

Petitioner represents that during this time he earned \$318.00

Two

Petitioner represents that it will appear from the allegations contained herein that a failure to pay in full the amount of \$7.00 a week, or \$30.00 a month, for the support of these children, is not due to any disregard for the orders of this Honorable Court but is due solely to the fact that this petitioner could not during that time earn sufficient amount to pay such sums in full. Petitioner sets forth that it is necessary for him to maintain an establishment, and in order to work it is necessary for petitioner to use some of his earnings for food and home for himself, and your petitioner respectfully submits that even though subsequent to the date of the decree he has remarried, your petitioner has not been lavish in spending the money earned by him, and that he has paid about 50% of his earnings, subsequent to the decree of divorce, either for the maintenance or support of the minors, or for the costs and attorney's fees incurred in said divorce proceedings.

Three

Petitioner represents that over four years ago your petitioner was indicted for burglarly, pleaded guilty, and was fined 1¢ and costs. Your petitioner represents that since the time of such indictment, it has been his earnest endeavor to live in an upright manner and that he has never since been arrested on any charge. Petitioner represents that he believes that his character is good and represents that he has numerous witnesses as to his character, who will testify at any re-hearing of the petition for the custody of the children.

Four

Petitioner further alleges that as set forth in the original petition the children are now in the custody of their Mother, who is living in a three room house with her Father and Mother and with her brother and his wife.

Five

Petitioner further alleges that during the time that he was living with Bertha Riel, his former wife, her conduct was slovenly, and many times he was forced to clean the house of dirt and filth, and it was necessary, in order to make the home habitable that he wash the children's clothes.

Six

Petitioner further alleges that at the time that the divorce was granted on petition of Bertha Riel, his former wife, the said Bertha Riel was living in adultery, as alleged in the original petition.

SEVEN

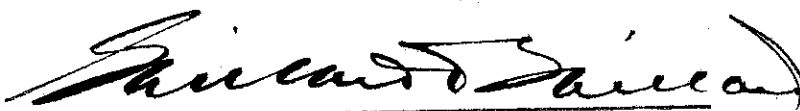
Petitioner further alleges that it will be far better for the welfare of the aforesaid minor children described in the original petition to live in his custody and care than to live under the conditions and in the custody of their mother. Petitioner represents that it would be more to the interests of the minors to award their custody and care to your petitioner than for said minors to continue in the custody and care of their mother, notwithstanding the facts and circumstances which were presented at the former hearing. And petitioner represents that on a rehearing he can show to this Honorable Court facts and circumstances which will justify his request and will conclusively show that the character of your petitioner is such that would justify the awarding of the custody of the children to him.

Eight

Petitioner further represents that if in the future his employment is not sufficient to allow him to care for these children his sisters will assist him in caring for and maintaining said children.

P R A Y E R

Your petitioner therefore prays that a re-hearing of said petition be granted and that at said rehearing the custody of the children be awarded to your petitioner, or to such other person or persons as your petitioner shows to be fit persons to care for such children.


Solicitors for Petitioner

The State of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County.

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Bertha M. Riel,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a ~~Bill of Complaint~~ ^{PETITION} lately exhibited by

J. George Riel

against said Bertha M. Riel

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, M. A. Stone, Register of said Circuit Court, this 7th day of

December, 193 3

M. A. Stone Register

N. B.— Any party defendant is entitled to a copy of the bill upon application to the Register.

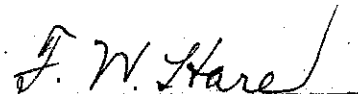
BERTHA M. RIEL,)
Complainant.) CIRCUIT COURT, BALDWIN COUNTY?, ALA.
Vs.) In Equity.
J. George Riel,)
Respondent.)

This cause is submitted on the petition of the respondent seeking a modification of a decree of divorce rendered in said cause on August 2nd, 1933, insofar as said decree affects the custody of the minor children of the parties, and also seeking an order commanding the said Bertha M. Riel not to remove the said children from the jurisdiction of this Court pending the hearing of said petition for the modification of said decree.

Upon consideration of said petition it is ordered and adjudged by the undersigned, as Judge of said Court, that said Bertha M. Riel be, and she hereby is, ordered and commanded to refrain from removing said children from the jurisdiction of this Court pending the hearing of the petition for the modification of said decree above mentioned.

It is further ordered that said petition be set down for hearing at Bay Minette, Alabama, at the Court house, at 10 A. M. on Monday January 29th, 1934, and that a copy of this order be served on said Bertha M. Riel by the Sheriff.

This December 29th, 1933.



Judge.

9

ORIGINAL

Received in office this day of

193.....

Sheriff.

No. Page

THE STATE OF ALABAMA

BALDWIN COUNTY

CIRCUIT COURT

I have executed this writ *this 29th day*
of January 1934
By serving a copy
on the within name
Bertha M Kiel

George J. Kiel

Plaintiff

VS.

Kiel George J.

Bertha M Kiel

Defendant

W. K. Stuart
Sheriff

By M H Wilkins
D J

CIVIL SUBPOENA

Issued this *29* day of

193*4*

Jan
J. A. Stone

Clerk.

Sheriff.

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

70.9.

Bert M. Riel
vs.
J. George Riel

PLAINTIFF

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
Fees of Register			AMOUNT BROUGHT FORWARD		
Filing each bill and other papers	\$	10	For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.	3	90
Issuing each Subpoena		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof		30	Each Notice Sent by Mail to Creditors		15
Entering each return thereof		15	Filing, Receipting for and Docketing each Claim, etc		25
For each Order of Publication		1 00	For all entries on Subpoena Docket, etc.		50
Issuing Writ of Injunction		1 50	For all entries on Commission Docket, etc.		50
For each Copy thereof		50	Making Final Record, per hundred words		15
Entering each return thereof		15	Certified Copy of Decree		1 00
Issuing Writ of Attachment		1 00	Report of Divorce to State Health Office, Acts 1915		50
Entering each return thereof		15	Total Fees of Register		5 90
Docketing each case	1 00		FEEES OF SHERIFF		
Entering each Appearance		25	Serving and Returning Subpoena on Deft.	\$1 50	
Issuing each Decree Pro Confesso on personal service	1 00		Serving and Returning Subpoena for Witness	65	
Issuing each Decree Pro Confesso on publication	1 00		Levying Attachment	3 00	
Each Order Appointing Guardian		1 00	Entering and Returning same	25	
Any other order by Register		50	Entering and Returning Execution	25	
Issuing Commission to Take Testimony		50	Selling Property Attached	25	
Receiving and Filing		10	Impaneling Jury	75	
Endorsing each package		10	Executing Writ of Possession	2 50	
Entering Order Submitting Cause		50	Collecting Execution for Costs	1 50	
Entering any other Order of Court		25	Serving and Returning Sci. Fa., each	65	
Noting all Testimony		50	Serving and Returning Notice	65	
Abstract of Cause, etc.		1 00	Serving and Returning Writ of Injunction	1 50	
Entering each Decree		75	Serving and Returning Writ of Exeat	1 50	
For Every Hundred Words Over Five Hundred		15	Taking and Approving Bonds, each	1 00	
Taking Account on Reference		3 00	Collecting Money on Execution		
Taking Testimony, etc.		15	Making Deed	2 50	
Each Report, Five Hundred Words or less		2 50	Serving and Returning Application	1 00	
For every Hundred Words Over Five Hundred		15	Serving Attachment, Contempt of Court	1 50	
Amount Claimed, Less than Five Hundred Dollars, etc.		2 00	TOTAL FEES OF SHERIFF		1 50
Issuing each Subpoena		25	Recapitulation		
Witness Certificate, each		25	Register's Fees		5 90
Issuing Execution, each		75	Sheriff's Fees		1 50
Entering each Return		15	Commissioner's Fees		
Taking and Approving Bond, each		1 00	Solicitor's Fees		
Making Copy of Bill, etc.		15	Witness Fees		
Each notice not otherwise provided for		50	Guardian Ad Litem		
Each Certificate or Affidavit, with Seal		50	Printer's Fees		
Each Certificate or Affidavit, no Seal		25	Trial Tax	3 00	
Hearing and passing on application for Receiver or Trustee	3 00		Recording Decree in Probate Court		3 00
Each Settlement with Receiver or Trustee	3 00		Total		10 40
Examining each Voucher of Receiver or Trustee	10				
Examining each Answer on Exception	3 00				
Recording Resignation or Suggestion of Death of Trustee	75				
Entering each Certificate to Supreme Court	50				
Taking Questions and Answers, etc.	25				
For all other service relating to such proceedings	1 00				
For service in proceeding to relieve minors, etc. same fee as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward					
	3	90			

Received payment this _____ day of _____ 193_____

Register.

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs.

STATE OF ALABAMA |

MOBILE COUNTY |

Before me, Celia Gerhardt, a Notary Public in and for said State and County, personally appeared J. George Riel, who on oath says that he has read over the foregoing petition and that the matters stated therein are true and correct to the best of his information and belief.

Mr. J. George Riel

Subscribed and

sworn to before me

this 4th day of December,

1933.

Celia Gerhardt

9

BERTHA M. RIEL,		
Complainant,		
vs		IN EQUITY
J. GEORGE RIEL,		CIRCUIT COURT OF
Respondent		BALDWIN COUNTY, ALABAMA.

Comes the Respondent, J. George Riel, and respectfully shows unto this Honorable Court as follows:

Heretofore on to-wit the 2nd day of August, 1933, a Decree of Divorce was rendered at the complaint of Bertha M. Riel against this, your Petitioner, J. George Riel, under the terms of which the custody of George C. Riel, Betty Mae Riel and Robert John Riel, all minor children of the said Bertham M. Riel and J. George Riel, was awarded to the complainant, the said Bertha M. Riel.

This petitioner, who was the respondent in said cause, respectfully shows unto this Honorable Court that the said Bertham M. Riel is unmarried since said divorce and is unmarried on this the 4th day of December, 1933.

This petitioner further shows unto this Honorable Court that the said Bertha M. Riel is not a suitable person to have the charge and custody of said children and that the well being and proper rearing of said children requires that the custody of said children be given to this, your Petitioner, J. George Riel, who is the father of said children.

As grounds for this petition, your petitioner respectfully shows unto this Honorable Court that the said Bertha M. Riel has lived in adultery, subsequent to the time that she and the said J. George Riel separated, with a person or persons unknown to your petitioner.

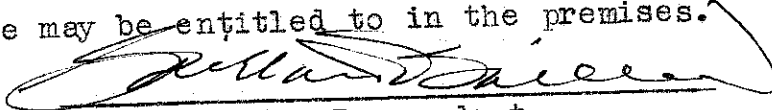
Your petitioner is informed and believes, and on such information and belief states that Oswald Lawrence is one person with whom the said Bertha M. Riel has so lived. Your petitioner further represents that the said Bertha M. Riel is an expectant mother but that he does not know the father of the expected child.

Your petitioner is able to properly care for and rear such children and is a suitable person to have the custody of such children.

Your petitioner is informed and believes and on such information and belief says that the said Bertha M. Riel is preparing to leave the State of Alabama and to remove such children from the State.

P R A Y E R

Your petitioner represents that on these grounds the said Bertha M. Riel is an unfit and unsuitable person to have the custody and care of said children and prays this Honorable Court to take away the custody of said children from the said Bertha M. Riel and give the custody of said children to your petitioner, J. George Riel. Your petitioner prays that this Honorable Court immediately issue an order prohibiting the said Bertha M. Riel from removing the aforesaid three children from the State of Alabama, and prays for such other, further, different or additional orders as he may be entitled to in the premises.


Attorneys for Respondent.

Quest Page 69

198
9
Remington
H. H. Holcomb

SERVE ON Bertha M. Riel

Circuit Court of Baldwin County
IN EQUITY

No. 9

SUMMONS

Betha M. Riel

VS.

J. George Riel

2051 Dauphin St

Mobile Ala

Solicitor for Complainant

Recorded in Vol. _____ Page _____

2051 Dauphin St. Mobile Ala

9

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this _____

day of _____ 193__

SHERIFF

Executed this 2nd day of

January 1934

by leaving a copy of the within Summons with

Betha M Riel

Defendant

~~W. H. Holcomb~~
W. H. Holcomb
Sheriff

Deputy Sheriff

By Betha M. Riel Baldwin Ala

~~Betha M. Riel~~
Betha M. Riel
Not found in my County and diligent search and inquiry

this 3rd day of January 1934

W. H. HOLCOMB, Jr., Sheriff

By Bruce Beaumont

RECORDED

IN CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY

Bertha M. Riel,

Complainant

vs

J. George Riel,

Respondent.

RECORDED
254

*Exhibit 2 from
2-1-934 W. Dennis
copy of the within
document
Book in Re:
W. P. Dennis
Riel*

*Filed Dec. 6, 1933
W. R. Lane
Register*

Gaillard & Gaillard

1/31/34

9

Circuit Court, Baldwin County, Ala.
In Equity.

No. 9

Paul

VS.

Paul

Cost Bill

Paid _____, 193

Register.

MOORE PRINTING CO., BAY MINNETTE, ALA.

THE STATE OF ALABAMA } S.D. Page No. _____
BALDWIN COUNTY } Case No. _____

To any Sheriff of the State of Alabama, GREETING:
You are hereby commanded to summon

_____ Plaintiff
_____ Defendant

to be and appear before the honorable, the Judge of the Circuit Court of Baldwin County, at the Court House thereof, by 10 o'clock of the forenoon, on the 24 day of June, 1934

and from day to day and term to term of said Court until discharged by law, then and there to testify, and the truth to say, in a certain cause pending, wherein George J. Rice Plaintiff and Beatrice M. Rice Defendant.

Herein fail not and have you then and there this Wit.
Given under my hand and seal, this 24 day of June, 1934

Clerk. Wm. A. Stone

RECORDED
W.A.S.
NO. 98413-2

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

BERNIA M. RICE
COMPLAINANT

VS.

J. GEORGE RICE
RESPONDENT.

DECREE

Filed on this the 30
day of December, 1935.

Wm. A. Stone
Register.

*Entered June
2nd 1934 by
Darius Coffey
of the within
on Beatrice M. Rice
Wm. A. Stone
Clerk*

9

Ernesto ~~...~~
No. 9

Bethel M. Peil

VS

J. George Weil

Filed Feb. 12th 1934
J. George Weil
Milford + Portland
Maine

[Faint signature]

9

E. Grant No 9

RECORD
No. 9

Paul

VS

Paul

Filed Oct. 13th 1994

W. A. Stone
Magistrate