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WILLIAM H. GREEN, COMPLAINANT,  
VS.  
DOROTHY C. GREEN, RESPONDENT.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,  
IN EQUITY.  
No. 808

This cause coming on to be heard is submitted upon the original Bill of Complaint, Answer and Cross Bill, and Answer to the Cross Bill.

The testimony of witnesses on behalf of the Complainant and the Respondent, Cross-Complainant, being taken orally in open Court.

The Court, after considering the pleadings and hearing the testimony of the witnesses is of the opinion that the Complainant, William H. Green, is not entitled to the relief prayed for, and that the Respondent, and Cross-Complainant, Dorothy C. Green, is entitled to the relief prayed for in her Cross Bill.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Respondent—Cross-Complainant, DOROTHY C. GREEN, and the Complainant—Cross-Respondent, WILLIAM H. GREEN, be, and the same are hereby dissolved, and that the said DOROTHY C. GREEN is forever divorced from the said WILLIAM H. GREEN.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said DOROTHY G. GREEN shall not again marry, except to the said WILLIAM H. GREEN, until sixty days after the rendition of this decree, and that if an appeal is taken within sixty days, she shall not again marry, except to the said WILLIAM H. GREEN, during the pendency of said appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said WILLIAM H. GREEN be, and he is hereby required to pay to the said DOROTHY C. GREEN, as permanent alimony, the sum of TWENTY (\$20.00) DOLLARS per month, such payment to be made on or before the 10 day of May, 1942, and a like payment on the same date of each succeeding month thereafter.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said WILLIAM H. GREEN be, and he is hereby required to pay to BEEBE & HALL, as Solicitors for DOROTHY C. GREEN, the sum of FIFTY (\$50.00) DOLLARS, as a reasonable attorney's fee in this cause.

IT IS FURTHER ORDERED that WILLIAM H. GREEN pay the costs herein to be taxed for which execution may issue.

This 15<sup>th</sup> day of May, 1942.

*J. N. Hare*  
Judge of Circuit Court, in Equity.

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

To Any Sheriff of the State of Alabama—GREETINGS:

WE COMMAND YOU, That you summon DOROTHY C. GREEN

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 lately exhibited by WILLIAM H. GREEN

against said DOROTHY C. GREEN

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, R. S. Duck, Register of said Circuit Court, this 21st day of March, 194 2.

R. S. Duck, Register

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

WILLIAM H. GREEN, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

DOROTHY C. GREEN, RESPONDENT.

IN EQUITY.

And now comes the Respondent and for answer to the Complainant's Bill of Complaint and to each count thereof, separately and severally, says:

1. She admits that she and the Complainant are both over twenty-one years of age, and that the Complainant is a resident of Baldwin County, Alabama, and has been for more than one year next preceding the filing of this Bill of Complaint. She denies that she is a non-resident of the State of Alabama, but on the contrary, states that she is now and has been for more than three years a resident of Baldwin County, Alabama, living at Bay Minette.

2. She admits the allegations contained in Paragraph 2 in that she and the Complainant were lawfully married on February 15, 1939.

3. She denies the allegations contained in Paragraph 3.

4. She denies each and every allegation contained in said Bill of Complaint, not herein specifically admitted, and demands strict proof of the same.

The Respondent for further answer to the Complainant's Bill of Complaint and praying that this may be taken as her cross bill, says:

A: That the Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama, living at Bay Minette;

B: That she and the Complainant are husband and wife;

C: That on, to-wit, July 14, 1941, and at various times while they were living together as husband and wife at Bay Minette, Alabama, the Complainant, William H. Green, cursed, threatened and abused her and on various occasions did actual violence to her person by striking her; that his conduct was such as to give her every reasonable apprehension to believe, and she did actually believe that if she continued to live with him he would do further violence to her person that would necessarily endanger her life and health;

That the Complainant, William H. Green, is an habitual user of strong drink and when under influence of strong drink has an uncontrollable temper.

D: That she is in feeble health and has no money or property to support herself, and no funds to prosecute or defend this cause; that the Complainant, William H. Green, draws compensation from the Government and also owns and operates a cafe in Bay Minette, and is fully capable of providing and caring for her.

Wherefore, the premises considered, the Respondent prays that your Honor will by proper process make the said William H. Green party respondent hereto and require him to plead, answer or demur to this, her cross bill, within the time and under the penalties prescribed by law and the practice of this Honorable Court.

The Respondent and Cross-Complainant prays that your Honor will order a reference to determine a reasonable alimony, pendente lite, and attorneys' fees to be paid to the Respondent and Cross-Complainant by the Complainant and Cross-Respondent.

The Respondent and Cross-Complainant further prays that upon a final hearing of this cause, your Honor will enter a decree awarding to her a decree of divorce, forever barring the bonds of matrimony existing between her and the said William H. Green, and that a further decree be granted to her awarding to her such reasonable amount as to your Honor may seem just and proper as permanent alimony.

The Respondent and Cross-Complainant prays for such other, further, different or general relief as she may be entitled to, and as in duty bound she will ever pray.

BEEBE & HALL

By: *[Signature]*

Solicitor for Respondent and Cross-Complainant.

*I hereby accept service of notice  
of the filing of the foregoing answer  
and cross-bill. This March 23, 1942*

*J. E. Smith*  
Solicitor for complainant

William H. Green,	)	
Complainant,	)	
	)	
vs	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
	)	IN EQUITY.
Dorothy C. Green,	)	
Respondent.	)	

ANSWER OF CROSS-RESPONDENT.

Now comes William H. Green, complainant and cross-respondent herein, and for answer to the cross-bill filed herein against him by Dorothy C. Green, respondent and cross-complainant, says and alleges as follows:

A: He admits the allegations of Paragraph A of said cross-bill.

B: He admits the allegations of Paragraph B of said cross-bill.

C: He denies the allegations of Paragraph C of said cross-bill and alleges that he did not on the occasion or date mentioned in said paragraph curse, threaten or abuse the said Dorothy C. Green, nor did he do so on any other occasion, nor did he do any actual violence to her person by striking her, nor was his conduct such as to give her every reasonable apprehension to believe that he would do violence to her person that would necessarily endanger her life or health. He denies that he is an habitual user of strong drink and further denies that he has an uncontrollable temper, and alleges that such charge or charges is or are untrue.

D: He denies the allegations of Paragraph D of said cross-bill and alleges that he is not able physically or financially to provide for the said Dorothy C. Green and alleges that he should not be required to do so after the misconduct of the said Dorothy C. Green as set forth in his original bill of complaint filed herein.

WHEREFORE, having fully answered, the said William H. Green prays the Court to dismiss the said cross-bill filed by the said Dorothy C. Green.

H. E. Smith  
Solicitor for the said  
William H. Green.

William H. Green,	)	
Complainant,	)	
	)	
vs	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
	)	IN EQUITY
Dorothy C. Green,	)	
Respondent.	)	

AFFIDAVIT OF NON-RESIDENCE

Personally appeared before me, R. S. Duck, Register of the Circuit Court of said State and County, William H. Green, who, being first by me duly sworn, deposes and says that he is complainant in the above entitled cause and that the respondent, Dorothy C. Green, is over the age of twenty-one years and is a non-resident of the State of Alabama, her postoffice address and place of residence being Bay Springs, Florida. Deponent further says that he, complainant, is over the age of twenty-one years.

*Wm H Green*

Sworn to and subscribed before me on this the 10th day of March, 1942.

*R S Duck*  
as Register

NOTICE TO NON-RESIDENT

TIMES PRINTING CO., BAY MINETTE

WILLIAM H. GREEN  
 No. \_\_\_\_\_  
~~XXXXXXXXXXXXXXXXXXXX~~ 808  
 vs.  
 DOROTHY C. GREEN  
 The State of Alabama,  
 Baldwin County.  
 Circuit Court, in Equity  
 This the 10th day of  
 March, 1942

In this cause it being made to appear to the Clerk of this Court by the affidavit of

WILLIAM H. GREEN

that the Defendant DOROTHY C. GREEN

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant DOROTHY C. GREEN over the age of 21  
 years; it is, therefore, ordered that publication be made in the Fairhope Courier  
 published in Fairhope Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

DOROTHY C. GREEN the said Defendant

to answer or demur to the Bill of Complaint in this cause by the 10th day of  
 April 1942, or after thirty days therefrom a decree Pro Confesso may be  
 taken against DOROTHY C. GREEN

R. S. DUCK

Register.

H. E. SMITH  
Solicitor for Complainant

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# CHANCERY EXECUTION

## BILL OF COSTS

No. 808. **William H Green.**

Vs. **Dorothy, C Green.**

Plaintiff

Defendant

FEES OF REGISTER	Dollars	Cents	Brought Forward	\$	Cts.
Filing each bill and other papers.....	1	00	For Receiving, keeping and paying out or distributing money, etc.; 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.		
Issuing each subpoena.....		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.		
Issuing each copy thereof.....		40	Each notice sent by mail to creditor.....	15	
Entering each return thereof.....	1	00	Filing, receipting for and docketing each claim, etc.....	25	
For each order of publication.....			For all entries on subpoena docket, etc.....	50	
Issuing writ of injunction.....			For all entries on commission docket, etc.....	50	
For each copy thereof.....			Making final record, per 100 words.....	15	50
Entering each return thereof.....			Certified copy of decree.....	1	00
Issuing Writ of Attachment.....			Report of divorce to State Health Office.....	50	
Entering each return thereof.....			(Acts 1915)		
Docketing each case.....	1	00	Total Fees of Register.....	2	00
Entering each appearance.....		24	FEES OF SHERIFF		
Issuing each decree pro confesso on per. ser.....			Serving and returning subpoena on deft.....	\$1	50
Issuing each decree pro confesso on publication.....			Serving and returning subpoena for witness.....	65	10
Each order appointing guardian.....			Levying attachment.....	3	00
Any other order by Register.....			Entering and returning same.....	25	
Issuing commission to take testimony.....			Selling property attached.....	75	
Receiving and filing.....			Impaneling Jury.....	2	50
Endorsing each package.....		50	Executing writ of possession.....	1	50
Entering order submitting cause.....			Collecting execution for costs.....	65	
Entering any other order of court.....			Serving and returning sci. fa., each.....	65	
Noting all testimony.....		50	Serving and returning notice.....	65	
Abstract of cause, etc.....		75	Serving and returning writ of injunction.....	1	50
Entering each decree.....			Serving and returning writ of exeat.....	1	50
For every 100 words over 500.....			Taking and approving bonds, each.....	75	
Taking account, etc.....			Collecting money on execution.....	2	50
Taking testimony, etc.....			Making deed.....	2	50
Each report, 500 words or less.....			Serving and returning application, etc.....	1	00
For every 100 words over 500.....			Serving attachment, contempt of court.....	1	50
Amount claimed less than \$500, etc.....			Total Fees of Sheriff.....	10	50
Issuing each subpoena.....		25	RECAPITULATION		
Witness certificate, each.....		25	Register's Fees.....	20	05.
Issuing execution, each.....		75	Sheriff's Fees.....	10	60
Entering each return.....			Commissioner's Fees.....	18	00
Taking and approving bond, each.....			Solicitor's Fees.....	53	10
Making copy of bill, etc.....			Witness Fees.....	7	32.
Each notice not otherwise provided for.....			Guardian Ad Litem.....	3	00
Each certificate or affidavit, with seal.....			Printer's Fees.....	3	00
Each certificate or affidavit, no seal.....			Trial Tax.....	3	00
Hearing and passing on application, etc.....			Recording Decree in Probate Court.....	3	00
Each settlement with receiver, etc.....			Total.....	34	05.
Exam'ing each voucher of Receiver, etc.....					
Examining each answer, etc.....					
Recording resignation, etc.....					
Entering each cert. to Supreme Court.....					
Taking questions and answers, etc.....					
For all other ser. relating to such proceedings.....					
For services in proceeding to relieve minors, etc, same fee as in similar cases.....					
Commission on sales, etc.: 1st \$100, 2 per ct.; all over \$100 and not exceeding \$1,000, 1½ per ct.; all over \$1,000; and not exceeding \$20,000, 1 per ct.; all over \$20,000, ¼ of 1 per ct.					
Sub Total Carried Forward.....	14	05			

The State of Alabama, } No. 84-07  
 Baldwin County. } Circuit Court, In Equity June Term, 1942

To Any Sheriff of the State of Alabama—GREETINGS:  
 You are hereby commanded, That of the goods and chattels, lands and tenements of William H Green Defendant.....  
Eighty Four And 07/100..... Dollars,  
 you cause to be made the sum of Dorothy, C Green. Plaintiff.....  
 which him 5th June  
 recovered of \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_ 194\_\_\_\_  
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of 84.07. Cost, Dollars,  
 costs of suit, and have the same to render to the said R S Duck,  
 and make return of this Writ and the execution thereof, according to law.  
 Interest from \_\_\_\_\_ 194\_\_\_\_ to date of collection.  
 Witness my hand, this 6th day of June, 194\_\_\_\_.

Register



# THE FAIRHOPE COURIER

E. B. GASTON ESTATE, PUBLISHER

A PROGRESSIVE PAPER FOR PROGRESSIVE PEOPLE

ESTABLISHED 1894

FAIRHOPE, ALABAMA

This is to certify that the attached legal notice appeared in the following issues of the Fairhope Courier, a paper published in the town of Fairhope County of Baldwin: March 12, 19, 26 and April 2

*Frances G. Crawford*  
-----  
Frances G. Crawford

Ed Fairhope Courier

*Subscribed and sworn to  
this 4th day of April, 1942  
before me*

*E. Crames*  
-----  
*Notary Public*

## Notice to Non-Resident

William H. Green No. 808 vs. Dorothy C. Green.

The State of Alabama, Baldwin County.

Circuit Court, in Equity. This the 10th day of March, 1942.

In this case it being made to appear to the Clerk of this Court by the affidavit of William H. Green that the defendant Dorothy C. Green is a non-resident of the State of Alabama and further, that, in the belief of said Affiant, the Defendant Dorothy C. Green over the age of 21 years; it is, therefore, ordered that publication be made in the Fairhope Courier, a newspaper published in Fairhope, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Dorothy C. Green the said Defendant to answer or demur to the Bill of Complaint in this cause by the 10th day of April 1942, or after thirty days therefrom a decree Pro Confesso may be taken against Dorothy C. Green.

R. S. Duck, Register  
H. E. Smith, Solicitor for Complainant. 31-4t

William H. Green,	)	
Complainant,	)	
	)	
vs	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
	)	IN EQUITY.
Dorothy C. Green,	)	
Respondent.	)	

TO THE HONORABLE F. W. HARE, JUDGE OF SAID COURT:

Comes William H. Green, as complainant, and brings this his bill of complaint against Dorothy C. Green, as respondent, and respectfully alleges as follows:

1. Complainant and respondent are each over the age of twenty-one years. Complainant is now and has been for more than one year next preceding the filing of this his bill of complaint a bona fide resident of Baldwin County, Alabama. The respondent is a non-resident of the State of Alabama, her place of residence and post-office address being Bay Springs, Florida.
2. Complainant and respondent were lawfully married to each other on February 15, 1939, and lived together as man and wife until, to-wit: July 14, 1941.
3. On said date of, to-wit: July 14, 1941, complainant ceased to live with respondent as man and wife or otherwise. Respondent became addicted after marriage to habitual drunkenness. She drank intoxicating liquors every day if she could obtain the same and her conduct was unbearable to complainant. Said separation occurred in Baldwin County, Ala.

WHEREFORE, the premises considered, complainant prays that the said Dorothy C. Green be made party respondent hereto and that due process of law by publication directed to her forthwith issue for service upon her the said Dorothy C. Green. Complainant prays that upon the final hearing hereof your Honor will give and grant to complainant a decree of absolute divorce from the said Dorothy C. Green and will grant to complainant permission to remarry; and further that your Honor will grant to complainant such further relief, orders and decrees as may be proper.

*A. B. Smith*  
Solicitor for complainant

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

William H. Green

vs

Dorothy C. Green

BILL OF COMPLAINT

Filed 3-10-42

P. J. French  
Register

808

Filed 3-10-42  
R. S. Smith  
Registrar

William H. Green,  
Complainant,

vs

Dorothy C. Green,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ANSWER TO CROSS-BILL OF  
RESPONDENT.

Filed May 20 1942  
P. S. Smith  
Register

808

WILLIAM H. GREEN, COMPLAINANT,

VS.

DOROTHY C. GREEN, RESPONDENT.

ANSWER AND CROSS-BILL.

*Filed Jan 21, 1942*  
*Paul D. Beebe*  
*Secretary*

Beebe & Hall, Lawyers