

1052

The State of Alabama, }
Baldwin County

No. 1052

CIRCUIT COURT IN EQUITY

WILDA POOS LEE

Complainant

vs.

CHARLES M. LEE

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the complainant is forever divorced from the Defendant, on account of

A B A N D O N M E N T

It is further ORDERED AND DECREED that the Complainant have the sole care and custody of the minor child of said marriage, Jacqueline Lee, now residing with Complainant, her mother.

It is further ordered, that the said Wilda P. Lee be, and she is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Wilda P. Lee pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said Complainant

It is further ordered, adjudged and decreed that the said Wilda P. Lee shall not again marry except to said Charles M. Lee until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Charles M. Lee.

during the said pendency of appeal

This 14th day of September 19 34.

J. W. Ware

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA }
BALDWIN COUNTY }

CIRCUIT COURT, IN EQUITY

I, _____, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the _____ day of _____, 19____,

in the cause of _____

Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the _____ day of _____, 19____

Register

TO THE HON. FRANCIS W. HARE, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA; SITTING IN
EQUITY:

Comes WILDA P. LEE and by this her bill of complaint presented against CHARLES M. LEE, respectfully shows:

First: That she and the defendant hereinafter named are both over the age of twenty one years and are now and have been for more than two years next prior to this date bona fide residents of Baldwin County, Alabama.

Second: That Complainant and the said CHARLES M. LEE are natives of Baldwin County, were legally married in Pensacola, Florida, on July 20th, 1928, and immediately returned to Baldwin County, Alabama, where they now reside near Robertsdale in said county and have lived together as man and wife up to the early part of June, 1932.

Three: That Charles M. Lee in the month of January, 1932, at a tourist camp near Pensacola committed adultery with a woman of that city, whose name is unknown to Complainant; that, while complainant suspected his infidelity she obtained no proof to verify her suspicions until about a week prior to the filing of this bill, and has now left the bed and board of her said husband and since positively learning of his unfaithfulness has in no way condoned said offense and is now living separate and apart from her said husband.

Four: That one child has been born to the parties hereto, a daughter Jacqueline, now three years of age, who is living with her mother at the home of the latter's parents near Robertsdale.

THE PREMISES CONSIDERED, Complainant prays that Charles M. Lee be made party defendant to this bill and by appropriate processes served upon him be required to answer same within the time fixed by law and to abide by such orders and decrees as may be made in the premises.

COMPLAINANT FURTHER PRAYS that an order of reference be made forthwith directed to the Register of this Court commanding him to ascertain and report upon a proper amount to be paid by Defendant to Complainant each month during the pendency of this cause as alimony pendente lite and a proper sum to be paid by Defendant to complainant as fees for her solicitor for the prosecution of this cause and that upon proper report of said Register a decree be rendered ordering the payment to her of the sums so found proper. Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said Charles M. Lee awarding her the custody of the infant child of the marriage the right to marry again should she so desire and such sum as permanent alimony as to your Honor shall seem proper, together with such other, further, and different relief as to equity shall seem meet.

Solicitor for Complainant.

Note: The Defendant is required to answer each paragraph of the foregoing bill, but not under oath.

Solicitor for Complainant.

LAW OFFICES

ELLIOTT G. RICKARBY

ROBERTSDALE, ALA.

September 17th, 1932

Thomas W. Richerson, Esq.
Register Circuit Court
Bay Minette, Alabama

Dear Sir:

LEE VS LEE: You will remember that some weeks ago a bill was filed in this cause service on which was help up in order to secure more evidence. Since then, the defendant has been threatening complainant and I have therefore prepared another bill adding thereto a prayer for injunction and enclose this, together with a bond executed by the complainant alone which, if the Judge executes the order I have prepared, will be sufficient, and also original and duplicate copies of the writ. Please send the bill and my letter to the Judge and when he signs the order issue summons and also the writ of injunction and get the sheriff to send it down here to W. R. Duckworth with instructions to hold it, saying nothing about it until he receives word from Mrs. Lee or me that the defendant is in the state. He is staying in Pensacola now and frequently comes over here and as soon as we learn he is across the Alabama line we will notify Duckworth. As this lady is kin to half of the leading people in Robertsdale, I will appreciate the matter being speeded up as soon as conveniently possible.

Sincerely,

Elliott G. Rickarby

R:F

The State of Alabama, }
Baldwin County

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY

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

WE COMMAND YOU, That you summon CHARLES M. LEE, Elmer, Ala

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


WILDA P. LEE

against said CHARLES M. LEE

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, T. W. Richerson, Register of said Circuit Court, this 15th day of

June 193 2

 Register.

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

TO THE HON. FRANCIS W. HARE, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA; SITTING IN
EQUITY:

Comes WILDA P. LEE and by this her bill of complaint presented against CHARLES M. LEE, respectfully shows:

First: That she and the defendant hereinafter named are both over the age of twenty one years and are now and have been for more than two years next prior to this date bona fide residents of Baldwin County, Alabama.

Second: That Complainant and the said CHARLES M. LEE are natives of Baldwin County, were legally married in Pensacola, Florida, on July 20th, 1928, and immediately returned to Baldwin County, Alabama, where they now reside near Robertsdale in said county and have lived together as man and wife up to the early part of June, 1932.

Three: That Charles M. Lee in the month of January, 1932, at a tourist camp near Pensacola committed adultery with a woman of that city, whose name is unknown to Complainant; that, while complainant suspected his infidelity she obtained no proof to verify her suspicions until about a week prior to the filing of this bill, and has now left the bed and board of her said husband and since positively learning of his unfaithfulness has in no way condoned said offense and is now living separate and apart from her said husband.

Four: That one child has been born to the parties hereto, a daughter Jacqueline, now three years of age, who is living with her mother at the home of the latter's parents near Robertsdale.

THE PREMISES CONSIDERED, Complainant prays that Charles M. Lee be made party defendant to this bill and by appropriate processes served upon him be required to answer same within the time fixed by law and to abide by such orders and decrees as may be made in the premises.

COMPLAINANT FURTHER PRAYS that an order of reference be made forthwith directed to the Register of this Court commanding him to ascertain and report upon a proper amount to be paid by Defendant to Complainant each month during the pendency of this cause as alimony pendente lite and a proper sum to be paid by Defendant to complainant as fees for her solicitor for the prosecution of this cause and that upon proper report of said Register a decree be rendered ordering the payment to her of the sums so found proper. Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said Charles M. Lee, awarding her the custody of the infant child of the marriage, the right to marry again should she so desire and such sum as permanent alimony as to your Honor shall seem proper, together with such other, further, and different relief as to equity shall seem meet.

Elliot B. Rinkaby
Solicitor for Complainant.

Note: The Defendant is required to answer each paragraph of the foregoing bill, but not under oath.

Elliot B. Rinkaby
Solicitor for Complainant.

The State of Alabama, }
Baldwin County

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY

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

WE COMMAND YOU, That you summon CHARLES M. LEE, Elsenor, Ala

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


WILDA P. LEE

against said CHARLES M. LEE

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, T. W. Richerson, Register of said Circuit Court, this 15th day of

June 193 2

 Register.

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

CIRCUIT COURT OF BALDWIN COUNTY ALABAMA

IN EQUITY

WILDA R. LEE, Complainant vs CHARLES M. LEE, Defendant

Comes the Complainant and amends her bill of Complaint by adding thereto paragraph three and a half as follows:

(3 1/2) THAT said Respondent abandoned Complainant on or about the 7th day of June, 1932 without just cause which said abandonment has continued since and in which time Complainant has had no relations with Respondent nor has she seen him during said period.

Elliot B. Rinkaby
Solicitor for Complainant.

WILDA P. LEE,
Complainant

E Q U I T Y

CIRCUIT COURT OF BALDWIN COUNTY
ALABAMA

vs

CHARLES M. LEE,
Defendant,

BEFORE ME, the undersigned Notary, personally appeared this day WILDA P. LEE, who being sworn says that Charles M. Lee, the defendant in the above styled cause is a non-resident of the State of Alabama, over the age of twenty-one years and that his present address is unknown to affiant, he having removed from Pensacola, where he was located for a time to parts unknown and that after making diligent inquiry she is unable to ascertain his present whereabouts or address, wherefore she prays that notice of this proceeding be given the said Chas M. Lee by publication.

Wilda P. Lee.

SUBSCRIBED AND SWORN TO before me this the ~~twentieth~~ day of June, 1934.

Leicester B. Rinsley
Notary Public, Baldwin County, Ala

CIRCUIT COURT OF BALDWIN COUNTY ALABAMA

IN EQUITY

WILDA P. LEE, Complainant vs CHARLES M. LEE, Defendant.

In this cause it appearing from the affidavit of the Complainant that Charles M. Lee, the defendant named in the bill is a non-resident of the State of Alabama whose present whereabouts are unknown to Complainant and that said defendant is over the age of twenty-one years; it is therefore ordered that said defendant Charles M. Lee appear in this Court and answer or demur to the bill of Complaint before the first day of August 1934 and failing to do so by said date a decree pro confesso may be taken against him.

It is further ordered that this order be published forthwith for four consecutive weeks in the "Fairhope Courier" and a copy thereof posted at the door of the Courthouse of this County.

Dated this the 23rd, day of June, 1934.


Register.

Notice to Non-Resident

CIRCUIT COURT OF BALDWIN,
COUNTY, ALABAMA.

IN EQUITY NO. 1052

WILDA P. LEE, Complainant vs
CHARLES M. LEE Defendant.

~~returned to the attorney for Complainant on
some the first day of August 1934
consecutive weeks of August 1934
Courier" and a copy thereof posted
at the door of the Courthouse of
this County.~~

Dated this the 23rd day of June,
1934.

M. A. STONE, Register.

ELLIOTT G. RICKARBY
Solicitor for Complainant. 48-4t

STATE OF ALABAMA

COUNTY OF BALDWIN

Before me, the undersigned Notary, personally appeared this day Frances G. Crawford, who being sworn says that she is bookkeeper for the "Fairhope Courier" a weekly newspaper of general circulation published in the town of Fairhope Baldwin County, Alabama, and that she knows of her personal knowledge that the attached notice of publication in ~~that~~ *ix* the case of Wilda P. Lee versus C. M. Lee was duly published in the regular issues of said Fairhope Courier on the dates of June 28th, July 5, 12, and 19th, 1934.

Frances G. Crawford

Subscribed and sworn to before me this
the 7th day of August, 1934.

Elliott G. Rickarby
Notary Public, Baldwin County, Alabama

WILDA P. LEE,
Complainant

VS

CHARLES M. LEE
Defendant.

)
)
)
EQUITY.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

KNOW ALL MEN BY THESE PRESENTS that WILDA P. LEE is held and firmly bound unto CHARLES M. LEE in the sum of ONE HUNDRED DOLLARS, for the payment of which she binds herself, her heirs, executors and administrators.

The condition of the above obligation is that WHEREAS the said WILDA P. LEE has filed her bill of Complaint in the Circuit Court of Baldwin County, Alabama, and has obtained thereon from the Hon. F. W. Hare, Judge of said Court, an injunction to restrain and enjoin the said CHARLES M. LEE from molesting or harming the Complainant, her mother, Mrs. Annie Poos or any other member of Complainant's family.

NOW THEREFORE, if the said WILDA P. LEE pay all damages and costs which the said CHARLES M. LEE may sustain by the suing out of such injunction, if the same be dissolved by the Circuit Court of Baldwin County, then this obligation to be void, otherwise to remain in full force and effect.

IN WITNESS WHEREOF, the obligor has hereto set her hand and seal this the day of September, 1932.

Wilda P. Lee (SEAL)

TO THE HON. FRANCIS W. HARR, JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA, SIT-
TING IN EQUITY.

Comes WILDA P. LEE and by this her amended bill of complaint presented against Charles M. Lee, respectfully shows:

FIRST: That she and the defendant hereinafter named are both over the age of twenty one years and are now and have been for more than two years next prior to this date bona fide residents of Baldwin County, Alabama.

SECOND: That Complainant and the said CHARLES M. LEE are natives of Baldwin County, were legally married in Pensacola, Florida, on July 20th, 1928, and immediately returned to Baldwin County, Alabama, where they lived together as man and wife up to the early part of June, since which time Complainant is living with her mother, near Robertsdale, in Baldwin County, and the Respondent, though still a resident of Alabama, is employed in the City of Pensacola, Florida.

THIRD: That since their marriage CHARLES M. LEE has been repeatedly guilty of acts of adultery at times and places and with women unknown to Complainant, who, though suspecting this infidelity obtained no proof to verify her suspicions until the early part of June, 1932, when she learned of an act of adultery committed by said Lee at a tourist camp near Pensacola with a woman whose name is yet unknown to her and which act of adultery she specifically charges. She further states that on obtaining this positive information of unfaithfulness, she at once abandoned the bed and board of her husband and has since that time in no way condoned said offense and is living separate and apart from him, since which time he has contributed nothing toward the support of Complainant or their child.

FOUR: That one child has been born to the parties hereto, a daughter Jacqueline, now three years of age, who is living with her mother at the home of the latter's parents near Robertsdale.

FIVE: That since leaving the said CHARLES M. LEE he has come to her mother's home and made threats of personal violence against Complainant, even threatening to kill her should she carry out her expressed intention of instituting divorce proceedings, which threats not only include Complainant but her mother and other relatives. Complainant avers that the defendant is a man of violent and ungovernable temper and that she fears if not restrained may do some serious harm to herself or her relatives if permitted to come around her unless restrained therefrom by some superior force.

THE PREMISES CONSIDERED, Complainant prays that CHARLES M. LEE be made party defendant to this bill and by appropriate process served upon him be required to answer same within the time fixed by law and to abide by such orders and decrees as may be made in the premises.

COMPLAINANT FURTHER PRAYS that an order of reference be made forthwith directed to the Register of this Court commanding him to ascertain and report upon a proper amount to be paid by defendant to Complainant each month during the pendency of this cause as alimony pen dente lite and a proper sum to be paid by Defendant to Complainant as fees for her solicitor for the prosecution of this cause and that upon proper report of said Register a decree be rendered ordering the payment to her of the sums so found proper. Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said CHARLES M. LEE, awarding her the custody of the infant child of the marriage, the right to marry again should she so desire, and such sum as permanent alimony as your Honor shall deem proper, together with such other, further and different relief as to equity shall seem meet.

Complainant further prays that upon her giving such bond as the Court shall require a writ of injunction be issued to the said CHARLES M. LEE enjoining him from coming upon the premises in which she now lives, or at any place at which she may in future be staying, commanding him to stay away from her and to have no conversation or inter-

course with her whatsoever except through her counsel and to abstain from injuring, accosting, or molesting Complainant, her mother, Mrs. Annie Pooos or any member of Complainant's family at any time during the pendency of this cause or without further orders from this court.

Elliott S. Richerby
Solicitor for Complainant.
[Handwritten signatures and notes]

Note: The Defendant is required to answer each paragraph of the foregoing bill, but not under oath.

Elliott S. Richerby
Solicitor for complainant.

STATE OF ALABAMA.
BALDWIN COUNTY.

Before me, the undersigned Notary, personally appeared this day WILDA P. LEE who, being sworn, says that the allegations in the foregoing bill are true.

(signed) Wilda P. Lee

Subscribed and sworn to before me this the 17th day of September, 1932.

(signed) *Bernice S. Folmar*
Notary Public, Baldwin County, Alabama

TO THOMAS W. RICHERSON, REGISTER CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.

On Complainant's entering into bond in the sum of ONE HUNDRED DOLLARS, for which her own recognizance will be sufficient surety, and conditioned as required by law, let an injunction issue as prayed for in the foregoing bill of Complaint.

Given under my hand this _____ day of September, 1932.

F. W. HARE,
Judge.

WILDA P. LEE

Complainant

vs

CHARLES M. LEE

Defendant

Comes the Complainant, Defendant being in default, and requests the Register to transmit to the Judge of this Circuit Court the file of papers in the cause including Complainant's evidence and note of testimony with the request that said cause be submitted for final decree in vacation.

Solicitor for Complainant.

WILDA P. LEE
Complainant

No. 1052

vs

CHARLES M. LEE
Defendant

In Equity
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

The depositions of WILDA P. LEE, IRIS ANN NEESE and
DELIA DEAN, witnessess for Complainant.

The said witnessess being by me first duly sworn to tell
the truth, the whole truth and nothing but the truth upon examination
by E. G. Rickarby, Esq., Solicitor for Complainant, testified as
follows:

W I L D A P . L E E

I am the Complainant in this cause and am now and have been
all of my life a resident of the State of Alabama residing for almost
ten years past at Robertsdale. I am over the age of twenty-one years
and on June 20th, 1928 was married to Charles M. Lee with whom I lived
as man and wife up to June 7th, 1932 near Robertsdale with the
exception of about two years from 1928 to 1930 when we lived temporarily
in Georgia where my husband was at work. In this time one child was
born to us, a daughter named Jacqueline, now five years of age who is
with me. On June 7th, 1932 my husband left me without cause and for a
while lived in or near Pensacola. Later on, I am informed, he left with
a traveling show and since that time I have heard nothing from him and
have lived with my Mother separate and apart from him since the time
he left me, seeing him only once or twice on the street in the latter
part of 1932. For more than two years past this abandonment has been
absolute. In this time he has done nothing for my support or that of
his little daughter.

Wilda P Lee

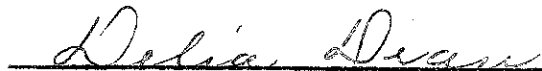
I R I S A N N N E E S E

I am a niece of the Complainant and see her almost daily. I have read over her testimony and know of my own knowledge that it is true and that her husband abandoned her the early part of September, 1932 and has done nothing for her or the child since nor has she had anything to do with him except to speak to him casually on the street.



D E L I A D E A N

I have known the Complainant for six or seven years and see her frequently. My acquaintance with her is such that I know that she and her husband have been separated for more than two years and that he has entirely abandoned her and her little daughter since the early part of September, 1932. She lives with her Mother near Robertsdale.



I, Virginia E. Crenshaw, the Commissioner named in attached commission, hereby certify that WILDA P. LEE, IRIS ANN NEESE, and DELIA DEAN, witnesses for Complainant in the cause of Wilda P. Lee vs Charles M. Lee pending on the Equity side of the Circuit Court of Baldwin County, appeared before me at my office at Robertsdale on the 7th day of September, 1934 and being by me duly sworn upon examination by the Solicitor for the Complainant, the Defendant being in default, testified as is hereinbefore set forth; That their evidence was taken down by me as near as might be in the language of said witnesses and after having been read over by them was subscribed by them in my presence.

I further certify that I am neither of counsel nor of kin to either party to this cause nor in any way interested in the result thereof.

Witness my hand and seal this the 7th day of September, 1934.



Commissioner

The State of Alabama, {
Baldwin County }

CIRCUIT COURT

To VIRGINIA CRENSHAW

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine WILDA P. LEE, IRIS ANN NEESE, and DELIA DEAN.

as witnesses in behalf of WILDA P. LEE in a cause pending in our Circuit Court of Baldwin County, of said State, wherein WILDA P. LEE

Complainant

and CHARLES M. LEE

Defendant,

on oath to be by you administered, upon Oral examination,
to take and certify the deposition S of the witnesses S and return the same to our Court, with all convenient speed, under your hand.

Witness Sixth day of September 1934

M. A. Stone

REGISTER

COMMISSIONER'S FEE, \$ 5.00 (not Paid)

WITNESS' FEES, \$ _____

TO THE HON. FRANCIS W. HARE, JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA, SIT-
TING IN EQUITY.

Comes WILDA P. LEE and by this her amended bill of complaint presented against Charles M. Lee, respectfully shows:

FIRST: That she and the defendant hereinafter named are both over the age of twenty one years and are now and have been for more than two years next prior to this date bona fide residents of Baldwin County, Alabama.

SECOND: That Complainant and the said CHARLES M. LEE are natives of Baldwin County, were legally married in Pensacola, Florida, on July 20th, 1928, and immediately returned to Baldwin County, Alabama, where they lived together as man and wife up to the early party of June, since which time Complainant is living with her mother, near Robertsdale, in Baldwin County, and the Respondent, though still a resident of Alabama, is employed in the City of Pensacola, Florida.

THREE: That since their marriage CHARLES M. LEE has been repeatedly guilty of acts of adultery at times and places and with women unknown to Complainant, who, though suspecting this infidelity obtained no proof to verify her suspicions until the early part of June, 1932, when she learned of an act of adultery committed by said Lee at a tourist camp near Pensacola with a woman whose name is yet unknown to her and which act of adultery she specifically charges. She further states that on obtaining this positive information of unfaithfulness, she at once abandoned the bed and board of her husband and has since that time in no way condoned said offense and is living separate and apart from him, since which time he has contributed nothing toward the support of Complainant or their child.

FOUR: That one child has been born to the parties hereto, a daughter Jacqueline, now three years of age, who is living with her mother at the home of the latter's parents near Robertsdale.

FIVE: That since leaving the said CHARLES M. LEE he has come to her mother's home and made threats of personal violence against Complainant, even threatening to kill her should she carry out her expressed intention of instituting divorce proceedings, which threats not only include Complainant but her mother and other relatives. Complainant avers that the defendant is a man of violent and ungovernable temper and that she fears if not restrained may do some serious harm to herself or her relatives if permitted to come around her unless restrained therefrom by some superior force.

THE PREMISES CONSIDERED, Complainant prays that CHARLES M. LEE be made party defendant to this bill and by appropriate process served upon him be required to answer same within the time fixed by law and to abide by such orders and decrees as may be made in the premises.

COMPLAINANT FURTHER PRAYS that an order of reference be made forthwith directed to the Register of this Court commanding him to ascertain and report upon a proper amount to be paid by defendant to Complainant each month during the pendency of this cause as alimony pendente lite and a proper sum to be paid by Defendant to Complainant as fees for her solicitor for the prosecution of this cause and that upon proper report of said Register a decree be rendered ordering the payment to her of the sums so found proper. Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said CHARLES M. LEE, awarding her the custody of the infant child of the marriage, the right to marry again should she so desire, and such sum as permanent alimony as your Honor shall deem proper, together with such other, further and different relief as to equity shall seem meet.

Complainant further prays that upon her giving such bond as the Court shall require a writ of injunction be issued to the said CHARLES M. LEE enjoining him from coming upon the premises in which she now lives, or at any place at which she may in future be staying, commanding him to stay away from her and to have no conversation or inter-

course with her whatsoever except through her counsel and to abstain from injuring, accosting, or molesting Complainant, her mother, Mrs. Annie Poos or any member of Complainant's family at any time during the pendency of this cause or without further orders from this court.

Wilda P. Lee

Clifford B. Rinkley
Solicitor for Complainant.

Note: The Defendant is required to answer each paragraph of the foregoing bill, but not under oath.

Clifford B. Rinkley
Solicitor for Complainant.

STATE OF ALABAMA.
BALDWIN COUNTY.

Before me, the undersigned Notary, personally appeared this day WILDA P. LEE who, being sworn, says that the allegations in the foregoing bill are true.

Wilda P. Lee

Subscribed and sworn to before me this the *17th* day of September, 1932.

Bernie S. Tolman

Notary Public, Baldwin County, Alabama

TO THOMAS W. RICHMOND, REGISTER CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.

On Complainant's entering into bond in the sum of ONE HUNDRED DOLLARS, for which her own recognizance will be sufficient surety, and conditioned as required by law, let an injunction issue as prayed for in the foregoing bill of Complaint.

Given under my hand this *20th* day of September, 1932.

F. W. Hare
Judge.

WILDA P. LEE,
Complainant.

IN EQUITY

vs.

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA

CHARLES M. LEE,
Respondent.

Comes the Complainant by her solicitor and makes application to the Register of this Court, to issue a Commission to take the testimony on oral examination of WILDA P. LEE, IRIS ANN NEESE, and DELIA DEAN, Witnesses for Complainant.

Complainant suggests the name of MISS VIRGINIA B. CRENSHAW, as a suitable person to act as Commissioner.

The above-named witnesses and the Commissioner reside at Robertsdale in Baldwin County.

Beattie B. Rindley
Solicitor for Complainant.

WILDA P. LEE
Complainant

vs

C. M. LEE
Defendant

NO. 1052

IN EQUITY

CIRCUIT COURT OF

BALDWIN COUNTY, ALA.

In this cause it appears to the Register by affidavit of publication on file that the order of publication heretofore made in this cause was published for four consecution weeks commencing June 28th 1934 in the "Fairhope Courier", a newspaper published at Fairhope Alabama, that a copy of said order was posted at the Court House door on the 23rd day of June 1934 but that no copy was mailed to the Defendant, his place of residence being unknown:

IT NOW FURTHER APPEARING to the Register that the said C. M. Lee has, to the date hereof, failed to plead, answer or demur to the bill of complainant in this cause:

IT IS THEREFORE, on motion of the Complainant ORDERED AND DECREED by the Register that the said bill of complaint be, and it hereby is, in all things taken as confessed against the said C. M. Lee.

Done at Bay Minette this the first day of September 1934.

W. A. Stone

Register.

WILDA P. LEE

vs.

CHARLES M. LEE

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, Amendment to Bill, Order of Publication, Proof of Publication, Bond for Injunction, Affidavit for Non Residence, Application for Commission, Decree Pro Confesso, Depositions, of Wilda P. Lee, Iris Ann Neese, and Delia Deen

and in behalf of Defendant upon

Register.

CIRCUIT COURT, BALDWIN COUNTY, ALA., IN EQUITY.

No. *1052*

Willie P. Lee

VS.

Charles M. Lee

PLAINTIFF

DEFENDANT

BILL OF COSTS

	Dollars	Cts.			
Fees of Register <i>R-4</i>					
Filing each bill and other papers.....	\$ 10	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	50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per cent of amount received.		
Issuing each copy thereof.....	40	40	Each Notice Sent by Mail to creditors.....	15	
Entering each return thereof.....	15	15	Filing, Receiving for and Docketing each Claim, etc....	25	
For each Order of Publication.....	1 00	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 <i>R. 1.2</i>	15	
Entering each return thereof.....	1 00		Certified Copy of Decree.....	1 00	
Issuing Writ of Attachment.....	15		Report of Divorce to State Health Office.....	50	
Entering each return thereof.....	1 00	1 00	Acts 1915		
Docketing each case.....	25		Total Fees of Register.....		<i>12 60</i>
Entering each Appearance.....	1 00	1 00			
Issuing each Decree Pro Confesso on personal service.....	1 00		Fees of Sheriff		
Issuing each Decree Pro Confesso on publication.....	1 00		Serving and Returning Subpoena on Deft.....	\$ 1 50	
Each order Appointing Guardian.....	50		Serving and Returning Subpoena for Witness.....	65	
Any other order by Register.....	50		Levying Attachment.....	1 50	
Issuing Commission to Take Testimony.....	50	50	Entering and Returning same.....	25	
Receiving and Filing.....	10	10	Selling Property Attached.....	75	
Endorsing each package.....	10	10	Impaneling Jury.....	75	
Entering order Submitting Cause.....	50	50	Executing Writ of Possession.....	2 50	
Entering any other Order of Court.....	25	25	Collecting Execution for Costs.....	1 50	
Noting all Testimony.....	50	50	Serving and Returning Sci. fa., each.....	65	
Abstract of Cause, etc.....	1 00	75	Serving and Returning Notice.....	65	
Entering each Decree.....	75	75	Serving and Returning Writ of Injunction.....	1 50	
For every 100 words over 500.....	15		Serving and Returning Writ of Exeat.....	1 50	
Taking account, etc.....	3 00		Taking and Approving Bonds, Each.....	75	
Taking Testimony, etc.....	15		Collecting Money on Execution.....		
Each Report, 500 words or less.....	2 50		Making Deed.....	2 50	
For every 100 words over 500.....	15		Serving and Returning Application.....	1 00	
Amount claimed less than \$500, etc.....	2 00		Serving Attachment, Contempt of Court.....	1 50	
Issuing each Subpoena.....	25		Total Fees of Sheriff		<i>1 50</i>
Witness Certificate, each.....	25				
Issuing Execution, each.....	75		Recapitulation		
Entering each return.....	15		Register's Fees.....		<i>12 60</i>
Taking and Approving Bond, each.....	1 00	1 00	Sheriff's Fees.....		<i>1 50</i>
Making copy of bill, etc.....	15		Commissioner's Fees.....		<i>5 00</i>
Each notice not otherwise provided for.....	50		Solicitor's Fees.....		
Each certificate or affidavit, with seal.....	50		Witness Fees.....		
Each certificate or affidavit, no seal.....	25		Guardian Ad Litem.....		
Hearing and passing on application, etc.....	3 00		Printer's Fees.....		<i>7 75</i>
Each settlement with receiver, etc.....	3 00		Trial Tax.....	3 00	<i>3 00</i>
Examining each voucher of receiver, etc.....	10		Recording Decree in Probate Court.....		
Examining each answer, etc.....	3 00		Total		<i>29 85</i>
Recording resignation, etc.....	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 per cent, all over \$100, and not exceeding \$1,000, 1 1-2 per ct.; all over \$1,000 and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct.					
Sub Total Carried Forward		<i>8 60</i>			

Received payment this _____ day of _____ 193__

Register.

Circuit Court, Baldwin County, Ala.
In Equity.

No. 1052

VS.

Cost Bill

Paid _____, 193

Register

Moore Ptg. Co.

*Copy 2000
Moore Ptg. Co.*

1052

Register

REGISTERED

No. 1052

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

Wida P. Lee

vs.

Charles M. Lee

NOTE OF TESTIMONY

Filed in Open Court this 11th

day of September 1934

REGISTER

MOORE PRINTING CO., BALDWIN COUNTY, ALA.

*Filed Sept 6th 1934
W. D. Stone
Register*

1052

RECORDED
10/24

WILDA P. LEE,
Complainant.

vs.

CHARLES M. LEE,
Respondent.

APPLICATION FOR
COMMISSION.

Filed Sept 7-19 94
W. A. Stone
Register

NO.

1032

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

WILDA P. LEE,

Complainant

vs.

CHARLES M. LEE,
Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

VIRGINIA E. GREENSHAW

WITNESSES:
WILDA P. LEE.
IRIS ANN NEESE

DELLA DEAN.

1052

RECORDED
INDEXED

WILDA P. LEE
Complainant

vs

CHARLES M. LEE
Defendant

REQUEST FOR SUBMISSION

Filed - Sept 1, 1974

M. A. Stone

Requester

F. W. HANE, Judge.

day of September, 1932.

On Complainant's entering into bond in the sum of ONE HUNDRED DOLLARS, for which her own recognizance will be sufficient surety, and conditioned as required by law, let an injunction issue as prayed for in the foregoing bill of complaint.

Given under my hand this

TO THOMAS W. RICHMOND, REGISTER CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.

Notary Public, Baldwin County, Alabama

(Signed) B. B. ...

Subscribed and sworn to before me this the 17th day of September, 1932.

(Signed) William O. ...

Before me, the undersigned Notary, personally appeared this day WILDA P. LEE who, being sworn, says that the allegations in the foregoing bill are true.

STATE OF ALABAMA, BALDWIN COUNTY.

Notary Public, Baldwin County, Alabama

foregoing bill, but not under oath.

Note: The Defendant is required to answer each paragraph of the

the pendency of this cause or without further order from this court. Any fee or any member of Complainant's family at any time during from injuring, accusing, or molesting Complainant, her mother, Mrs. course with her whatsoever except through her counsel and to obtain

1052

RECORDED

WILDA P. LEE
Complainant

VS

O. M. LEE
Defendant

"DECREE PRO CONFESSO"

Filed Sept 6th 1984
M. A. Stone
Perquisite

Filed Sept 12-1984
Perquisite

1052

2501

Circuit Court, Baldwin County, Ala.
In Equity.

No. 1052

vs.

Cost Bill

Paid _____, 193

Register

Moore Ptg. Co.

Cost Bill
(1052)

RECORDED
254.

No. 1052

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

Wilda P. Lee

vs.

Charles M. Lee

NOTE OF TESTIMONY

Filed in Open Court this 11th

day of September 1934

REGISTER

RECORDED
INDEXED

No. 103

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY,
Baldwin County, Ala.

W I L D A P . L E E

VS

C H A R L E S M . L E E

DECREE OF DIVORCE

Filed in office this 14th

day of September, 1934

G. D. Stone
Register.

E. O. M.

(copy)

Serve on Charles WLee

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

WILDA P. LEE
vs.
CHARLES M. LEE

ELLIOTT G. RICKARBY
Solicitor for Complainant.

Recorded in Vol. _____ Page _____

The State of Alabama,
BALDWIN COUNTY.

Received in office this _____

day of _____ 193_____

Sheriff.

Executed this _____ day of _____

_____ 193_____

by leaving a copy of the within Summons with

~~Defendant.~~

Sheriff.

By _____
Deputy Sheriff.

RECORDED

WILDA P. LEE

Complainant.

VS

CHARLES M. LEE.

Defendant.

BOND FOR INJUNCTION.

Filed Sept 22/1932
D. W. McInerney
Register

No 1052

RECORDED
and

WILDA F. LEE
Complainant

VS

C. M. LEE
Defendant

PROOF OF PUBLICATION

*Filed Sept 6th 1934
W.F. Lee
Register Book*

*Filed Sept 12th 34
W.F. Lee
Register*

No 1052

RECORDED
POST

WILDA F. LEE
Complainant

VS

C. M. LEE
Defendant

PROOF OF PUBLICATION

Filed Sept 6, 1904,
W. F. A. Stone,
Register & Book.

Filed Sept 12, 1904
W. F. A. Stone
Register & Book

1052

970 1032

WILDA P. LEE,
COMP'Y,

VS

CHARLES M. LEE,
Defendant.

RECORDED
234

ORDER OF PUBLICATION.

*Filed June 29th 1994
Phyllis R. Brown
Magistrate*

1033

RECORDED

WILDA P. LEE, Compt,

VS

CHARLES M. LEE, Deft.

AMENDMENT TO BILL.

Filed March 29th 1934

W.P. Lee

Registrator

ELLIOTT G. RICKARBY,

Solicitor for Compt.

ENCLOSURE
(original)

Serve on _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

WILDA P. LEE

vs.

CHARLES M. LEE

Sumner Lee

ELLIOTT G. RICKARBY
Solicitor for Complainant.

Recorded in Vol. _____ Page _____

1052
The State of Alabama,
BALDWIN COUNTY.

Received in office this

day of

193

W. P. Lee
Sheriff.

Executed this

day of

193

by leaving a copy of the within Summons with

W. P. Lee

Defendant.

Sheriff.

By _____
Deputy Sheriff.

*Return & left
not seen & in
Baldwin County*

8/16/32

W. P. Lee

105-2

RECORDED
2/24

W IDA P. LEE,
Complainant.

vs.

CHARLES M. LEE,
Respondent.

APPLICATION FOR
COMMISSION.

ET
Filed Sept 7-19 34
W. A. Stone
Recorder

1053
RECORDED
284

WILDA P. LEE

VS

CHARLES M. LEE

Affidavit of
Non-residence

*Filed June 29th 1934
Wm. W. Brown
Clerk*

NO. 1032

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

WILDA P. LEE,

Complainant
vs.

CHARLES M. LEE,
Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:
VIRGINIA E. CRENSHAW

WITNESSES:
WILDA P. LEE.
IRIS ANN NEESE

DELIA DEAN.

10572
RECORDED

WILDA P. LEE
Complainant

vs

CHARLES M. LEE
Defendant

REQUEST FOR SUBMISSION

Filed - Dec 11, 1934

M. O. Stone

Request