

893

GEORGE HALL, COMPLAINANT,
VS.
DAISY HALL, RESPONDENT.

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

And now comes the Respondent and denies each and every allegation contained in the Complainant's Bill of Complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony on behalf of the Complainant, the right to cross examine Complainant's witnesses, and agrees that this cause be submitted forthwith, without further notice for final decree.

The Respondent accepts service of summons and complaint in this cause.

Daisy Hall

WITNESS:
William Hall

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon DAISY HALL 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 GEORGE HALL against the said DAISY HALL, and further to do and perform what said Judge shall order and direct in that behalf, and this the Respondent 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 18th day of December, 1942.

GEORGE HALL, COMPLAINANT,	IN THE CIRCUIT COURT OF
VS.	BALDWIN COUNTY, ALABAMA,
DAISY HALL, RESPONDENT.	IN EQUITY.

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now comes your Complainant, GEORGE HALL, and humbly complaining against the Respondent, DAISY HALL, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over twenty-one years of age and residents of Baldwin County, Alabama;

2.

That your Complainant and the Respondent were married in Bay Minette, Baldwin County, Alabama in 1923.

3.

That in 1935, the Respondent voluntarily abandoned the bed and board of the Complainant, and has remained away voluntarily and continuously since that time.

PRAYER FOR PROCESS

Wherefore, the premises considered, your Complainant prays

that your Honor will by proper process, make the said DAISY HALL, party respondent to this Bill of Complaint, requiring Her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; and that your Honor will give and grant unto him such other, further, different and general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

By: 

Solicitors for Complainant.

IN THE MATTER OF:

EX PARTE PETITION OF
LUCILLE GEMINDEN,
TO BE RELIEVED OF THE
DISABILITIES OF NON-AGE.

NO. 893

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

D E C R E E.

This cause coming on to be heard in term time and having been submitted for decree on the verified petition filed in said cause and ex parte affidavits of Eugene Lehmann and Carl Richard Lehmann, thereupon, upon consideration thereof, it is ordered, adjudged and decreed by the Court that Lucille Geminden, who is a minor over the age of nineteen years, be and she is, relieved of the disabilities of non-age, and she is vested with the power to sue and be sued, contract and be contracted with, to receive and take possession of any real and personal property to which she is entitled, to purchase real and personal property, to sell and convey, and to do all things, and to all intents and purposes, as effectually as if she were twenty-one years of age, concerning real estate and personal property.

It is further decreed that the said Lucille Geminden pay the costs of this proceeding, for which execution may issue.

Done this ^{19th} day of Jan A. D., 1942.

W. M. Bare
JUDGE.

Lehmann file

EX PARTE PETITION OF
LUCILLE GEMINDEN,
TO BE RELIEVED OF THE
DISABILITIES OF NON- AGE

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
File 893
IN EQUITY.

AFFIDAVIT.

Personally appeared before me, Orvis M. Brown, a Notary Public, in and for said State and County, Eugene Lehmann, who, being first by me duly sworn, deposes and says that he, deponent, is a resident of said State and County and over the age of 21 years; that he is personally acquainted with Lucille Geminden, who is a minor over the age of 19 years, and has known her for several years; that the said Lucille Geminden, is, in the opinion of the deponent, as capable of managing her own and other business affairs as if she were 21 years of age. She is possessed of as sound judgement as if she were 21 years of age. This deponent further says that it would be to the interest of the said Lucille Geminden to have her disabilities of non-age removed; that she has no father, mother or guardian.

Eugene Lehmann
Eugene Lehmann

Sworn to and subscribed before me this *30th* day of April, 1942.

Orvis M. Brown
Notary Public, Baldwin County, Alabama.
My Commission Expires: April 2nd, 1943.

AFFIDAVIT.

Personally appeared before me, Orvis M. Brown, a Notary Public, in and for said State and County, Carl Richard Lehmann, who, being first by me duly sworn, deposes and says that he, deponent, is a resident of said State and County and over the age of 21 years; that he is personally acquainted with Lucille Geminden, who is a minor over the age of 19 years, and has known her for several years; that the said Lucille Geminden, is, in the opinion of the deponent, as capable of managing her own and other business affairs as if she were years of age. She is possessed of as sound judgement as if she were 21 years of age. This deponent further says that it would be to the interest of the said Lucille Geminden to have her disabilities of Non-age removed; that she has no father, mother or guardian.

Carl Richard Lehmann
Carl Richard Lehmann

Sworn to and subscribed before me this *30th* day of April, 1942.

Orvis M. Brown
Notary Public, Baldwin County, Alabama.
My Commission Expires: April 2nd, 1943.

EX PARTE PETITION OF
LUCILLE GEMINDEN,
TO BE RELEIVED OF THE
DISABILITIES OF NON-AGE.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

File # 43
IN EQUITY.

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

Your petitioner, Lucille Geminden, respectfully represents unto your Honor that she is a resident of the State of Tennessee, and is of the age of nineteen years, being over the age of nineteen years, but under the age of 21 years. That she has no mother, ^{no father,} nor no guardian. She, petitioner, is entitled to certain property in her own right, which is located in Baldwin County, Alabama, and it would be to the interest of petitioner to have her disabilities of non-age removed. Petitioner represents unto your Honor and the Court that she, petitioner, is sober and industrious and possessed of sound judgement for her years, WHEREOF:

Your petitioner prays that she may be relieved of her disabilities of non-age and that she be vested with the power to sue and be sued, contract and be contracted with and to take possession of and convey real and personal property as if she were 21 years of age.

Lucille Geminden
PETITIONER.

Sworn to and subscribed before me this the ³⁰ day of ^{apr} ~~May~~, 1942.

R. D. Eiders
Notary Public, ~~Sumner~~ ^{Sumner} County, Tennessee
My Commission Expires: 10/18/1943

SEAL.

893

RECORDED
INDEXED

RECORDED

RECORDED

Filed June 4th 1943
Edward
Ray

893

RECORDED

Wm. J. Fox
Cal. 1942

890

RECORDED

George Hall,
Complainant,

vs

Daisy Hall,
Respondent.

SUMMONS AND COMPLAINT.

Executed Dec 17th 1942

by serving copy of within Summons and
Complaint on

Daisy Hall

W. C. Stuart Sheriff

By _____ Deputy Sheriff

Filed December 17th, 1942.

Proctor
Register

89 **RECORDED**

GEORGE HALL, COMPLAINANT,

VS.

DAISY HALL, RESPONDENT

ANSWER & WAIVER

THE STATE OF ALABAMA
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

George Hall

COMPLAINANT

VS.

Daisy Hall

RESPONDENT

I, Virginia Keel

as ~~Register~~ and Commissioner

have called and caused to come before me George Hall and C. H. Davis

witness— named in the Requirement for Oral Examination, on the ^{19th} day of December

19⁴², at the office of Beebe & Hall

in Bay Minette, Alabama, and having first sworn said witness— to speak the truth,

the whole truth, and nothing but the truth, the said George Hall

doth depose and say as follows:

My name is George Hall. I live in Bay Minette, Baldwin County, Alabama, and am over twenty-one years of age.

The Respondent Daisy Hall is over twenty-one years of age, and is a resident of Baldwin County, Alabama, living at Perdido, Alabama.

The Respondent and I were married at Bay Minette, Alabama, in 1923. We lived together as man and wife in Baldwin County, Alabama, until in 1935.

In 1935 the respondent voluntarily abandoned my bed and board, and has remained away voluntarily and continuously since that time.

I at no time gave the respondent any reason for leaving me, and have done nothing toward keeping her away.

The respondent has repeatedly stated that she never intends to again live with me.

George Hall

C. H. Davis a witness for the Complainant being first duly sworn, deposes and says:

My name is C. H. Davis. I live at Bay Minette, Baldwin County, Alabama. I am personally acquainted with George Hall the Complainant in the above cause. I know of my own personal knowledge that the Complainant and the Respondent have not lived together as husband and wife for the past six or seven years. I have had occasion to be with and around the Complainant for the past six or seven years.

C. H. Davis

ORAL EXAMINATION

I, Virginia Keel, as ~~XXXXX~~ Register and Commissioner hereby certify that the foregoing deposition— on Oral Examination was taken down in writing by me in the words of the witness— and read over to them and they signed the same in the presence of myself H. M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness— or had proof made before me of the identity of said witness—; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 19th day of December, 1942.

Virginia Keel (L. S.)

No. 84D Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Complainant _____

Vs. _____

Respondent _____

ORAL DEPOSITION

Filed _____, 19____

RECORDED IN _____, Register _____

Record _____

Vol. _____ Page _____

Register _____