

Annie Belle Carpenter, Complainant, )

vs. No. \_\_\_\_\_ )

Sammy Carpenter, Respondent, )

: -In the Circuit Court of Baldwin Co.,  
Alabama. In Equity.

Depositions of Mrs. Annie Belle Carpenter and Mrs. Katy (Katie)

Mae Neely, witnesses for complainant, taken at the office of G. B. Cleveland,  
No. 40 1/2 N. Royal St., Mobile, Alabama, at 1:10 P.M. Present, the com-  
missioner, atty. for complainant and said witnesses.

Mrs. Annie Belle Carpenter, being duly sworn, testified as fol-  
lows:-

My name is Mrs. Annie Belle Carpenter. Both the respondent and I are over  
21 years of age. We were married March 15th, 1920, in Baldwin Co., Ala., U.S.A.

We have the following children:

- Hall Carpenter, boy, aged 13.
- Beniar " " " 11
- Ralph, " " " 8
- Anna MARBLE (Merle), " girl " 10
- Deloris, " " " 7
- Sames " boy " 4

We are both boni fide residents of Baldwin County, and have  
been for more than the three years next immediately preceding the filing of this  
suit.

The respondent has been guilty of actual violence to my person  
with danger to my life or health and there is reasonable apprehension that  
he will be guilty of the same again if I attempt to live with him, from his con-  
duct. He has developed a bad temper and a truck we several

times, commencing about nine years ago. He hit me with his fists.

About June 22nd, 1935, he cursed and abused me and knocked me out of  
my chair at the table, with his fists, striking me two or three times.

Before he knocked me out of the chair, he threatened me with a  
shotgun and also a long knife, machette, and threatened to kill me.

He told me to pack up my clothes and leave. I was ill and left on  
the 24th two days later, and moved into a house nearby and am still living  
there, and am separated from him.

He on another occasion broke two or three chairs over my sewing ma-  
chine. Last October I was correctly one of the children at the table and  
he got up and struck me with his fist and got all of my clothes and threw  
them in my face and told me to leave. He also broke my wardrobe.

On numerous occasions he has cursed and abused me, as well as threaten-  
ed me. He has threatened me with a stick of wood in his hand, also, on

June 22nd, when I came in the kitchen, before he did the above. I did  
nothing to cause him to do so.

Since leaving him he has come to my house and asked me to get my  
gun and shoot it out, and abused me. He fired his pistol in the yard, when I  
went into the house and closed the door.

I would like to get an order to keep him from annoying me.

Further said witness siath not.

Mrs Annie Belle Carpenter

To the Hon. J.W.Hare, Judge of the Circuit Court of Baldwin Co., Ala.,  
sitting in equity, at Bay Minette:-

Annie Belle Carpenter, a boni fide resident of Baldwin  
Co., Alabama, over the age of 21 years, Complainant,

vs.

Sam Carpenter, of the same state and county, over 21  
years of age, Respondent.

1.

The complainant states that both the respondent and herself re-  
side at Carpenter, in Baldwin county, Alabama, and have for many years, and  
both are over the age of 21 years, all as stated in the caption.

2.

That that they were legally married in this state on March 15th,  
1910, and have six children, as follows:-

Hall, 13.  
Peniar, 11.  
Anna Merle, 10,  
Ralph C., 8,  
Dolores, 6,  
James, 3.

All of whom reside with the complainant at Carpenter, Alabama.

That the respondent has developed a very bad temper and has at-  
tacked the complainant with his fists and threatened her with a gun and knife.  
He has ordered her to leave his house on several occasions and she finally  
did so and is living in another house nearby at the same place. That he has  
been guilty of actual violence to her person with danger to her life or  
health, and there is reasonable apprehension, from his conduct, that he will  
be guilty of the same again, and, perhaps worse, if she attempts to live with  
him. That he has not properly supported her and her children and she has  
been obliged to work in the fields, in the boiling sun, for 75 cts. a day, at  
times, to feed them. He has also broken up her furniture and torn up her  
clothing at times.

Premises considered, she prays that the said Sam Carpenter be made  
a party defendant hereto by proper process and be required to answer, but his  
oath to his answer is waived. That at the hearing she be given an absolute  
divorce from the respondent, with leave to marry and custody of the children.

Also general relief, as she will ever pray, etc.

*George Owen Chasland*  
Atty. for complainant, P.O. Box 704,

Mobile, Ala. Office 60 1/2 N. Royal  
St., Mobile, Ala.

# Circuit Court, Baldwin County, Ala., IN EQUITY.

146

*Amie Belle Carpenter*  
vs.  
*Sam Carpenter*

PLAINTIFF

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
<b>Fees of Register</b>			<b>AMOUNT BROUGHT FORWARD</b>		
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.	17	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	<b>Total Fees of Register</b>	7	70
Docketing each case	1	00	<b>FEEES OF SHERIFF</b>		
Entering each Appearance		25	Serving and Returning Subpoena on Deft.	\$	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	Impanelling 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	<b>TOTAL FEES OF SHERIFF</b>	1	50
Issuing each Subpoena		25	<b>Recapitulation</b>		
Witness Certificate, each		25	Register's Fees		
Issuing Execution, each		75	Sheriff's Fees		
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		
Each Settlement with Receiver or Trustee		3 00	<b>Total</b>	14	20
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.					
<b>Sub Total Carried Forward</b>					

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.

THE STATE OF ALABAMA, }  
Baldwin County.

No. 146 Circuit Court, In Equity

Annie Belle Carpenter Complainant

vs.

Sam Carpenter 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 Cruelty

It is further ordered that the said Annie Belle Carpenter 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 Annie Belle Carpenter 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 be issued against the said Sam Carpenter

It is further ordered, adjudged and decreed that said Annie Belle Carpenter shall not again marry except to said Sam Carpenter until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Sam Carpenter

It is further ordered, decreed and adjudged that Annie Belle Carpenter have the sole care, custody, and control of the said minor children of this marriage, to-wit:- Hall Carpenter, Peniar Carpenter, Anna Merle Carpenter, Ralph C. Carpenter, Dolores Carpenter, and James Carpenter, subject to the further orders of this Court.

This 20th day of August 1935

*A. W. Hare*

Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, }  
Baldwin County.

Circuit Court, In Equity.

I, Robert S. Duck, 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 \_\_\_\_\_ 193\_\_\_\_\_ in the cause of \_\_\_\_\_

Annie Belle Carpenter Complainant

vs.

Sam Carpenter Defendant  
as appears of record in said Court.

Witness my hand and the seal of said Court, this the \_\_\_\_\_

day of \_\_\_\_\_ 193\_\_\_\_\_

Register

# The State of Alabama, Mobile County

Annie Belle Carpenter,

Complainant

Circuit Court of Mobile County

No. VS.

Sam Carpenter,

Defendant

IN EQUITY

The

Complainant

requests the oral examination of the following named witnesses

on behalf, viz:

Annie Belle Carpenter and Mrs. Catey Mae

*Neely*

said witnesses reside in the County of *Baldwin*

State of Alabama

*Dan Smith*

who resides at *Mobile (Box 704)*

is suggested as *a* suitable person *to* to be appointed Commissioner to take deposition of

said witnesses on such oral examination

*G. B. Ludman,*

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 Sam Carpenter,

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

Annie Belle Carpenter,

against said Sam Carpenter

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, Robert S. Duck, Register of said Circuit Court, this 16th day of July 1935

Robert S. Duck Register

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

Annabelle Carpenter, Complainant, )  
vs.

Sam Carpenter, Respondent. )

: - In the Circuit Court Baldwin Co., Ala.  
In Equity.

Answer.

Comes the repondent and for answer admits the marriage and birth of the children, but denies the rest of the statements.

He waives all necessary notices and agrees to submission in term time or vacation.

Witness to signature: -

J. B. Bladburn

Sam Carpenter  
Respondent.





139  
RECORDED  
W.C.K.

146

Serve on Sam Carpenter  
**Circuit Court of Baldwin County**  
IN EQUITY

No. 146

**SUMMONS**

Annie Belle Carpenter

VS.

Sam Carpenter,

Geo. B. Cleveland,  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA,**  
BALDWIN COUNTY

Received in office this 17

day of July, 1935

*W.C.K.*

SHERIFF

Executed this 17th day of

July 1935

by leaving a copy of the within Summons with

Sam Carpenter

Defendant

*Arthur A. Lewis*

Sheriff

By \_\_\_\_\_  
Deputy Sheriff

38  
Clerk  
Robert D. Bell

146  
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and will copy me, (Gallagher)

vs. No.

Department, Department

To the Hon. Judge

petitioner, and in his deposition  
respectfully states that he then signed  
has signed in since this date and  
a distinct intent to be bound out  
the board and close the first  
out. The first copy of this was  
to find the program for honor in  
not to read to his honor, on  
keep a copy of the same for  
G.R. O'Brien, Esq., for

146

146

RECORDED  
Book

No. 146

Circuit Court of Mobile County

Mobile, Alabama  
IN EQUITY

*Amie Belle Bonfante*

VS.

*Sam Bonfante*

DEMAND FOR ORAL EXAMINATION

Filed *3/21* at *Mobile* 193 *5*

*Robert S. Ruck*

Register

146

No. \_\_\_\_\_

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**CIRCUIT COURT, IN EQUITY  
Baldwin County, Ala.**

VS.

**DECREE OF DIVORCE**

Filed in office this 20

day of August 1935

Robert & Ileana  
REGISTER

E. O. M.

MOORE PRINTING CO., BAY MINETTE, ALA.

146

Circuit Court, Baldwin County, Ala.  
In Equity.

No. 46

VS.

**Cost Bill**

Paid \_\_\_\_\_, 193

Register.

*Make Copies*

**RECORDED**  
*Book*

No. 146

ANNIE BEULIE CARPENTER

VS

SAM CARPENTER

BILL OF COMPLAINT

Filed July 16th, 1935.

*Robert A. Davis*

146

NO. \_\_\_\_\_

146

The State of Alabama  
BALDWIN COUNTY  
CIRCUIT COURT

~~Annie Belle Carpenter~~

Complainant

vs.

Sam Carpenter,

Defendant

COMMISSION TO TAKE DEPOSITION  
DAN SMITH

COMMISSIONER:

Fee Paid by Complainant.  
\$1.00.

WITNESSES:

Annie Belle Carpenter  
Cathy Mae Neely.



NO

146

The State of Alabama  
BALDWIN COUNTY  
CIRCUIT COURT

Annie Belle Carpenter

Complainant

vs.

Sam Carpenter,

Defendant

COMMISSION TO TAKE DEPOSITION  
DAN SMITH

COMMISSIONER:

Fee paid by Complainant.  
\$1.00.

WITNESSES:

Annie Belle Carpenter  
Cathy Mae Neely.

Katie, or Caty, Mae Neely, being first duly sworn, testified as follows:-

I am a sister of the complainant and know both parties to the case, Annie Belle Carpenter and Mr. Sam Carpenter. I know they are over 31 years of age and reside in Baldwin Co., Alabama.

I was visiting them at Carpenter, Ala., in June, 1935, and got up out of bed when I heard Sam cursing and abusing my sister and threatening her and was in the hall and saw him with a shot gun in his hand and also a long knife. I heard him threaten to kill her and saw him knock out of her chair to the floor with his fist, striking her several times.

I have heard him curse, threaten and abuse her on several occasions. I think, from his conduct, there is reasonable apprehension that he will be guilty of actual violence to her person with danger to her life, or health if she attempted to live with him again.

I do not think he is a proper person to have custody of their children and know she is. She is a good woman and would raise them right.

I know he has no properly supported them and my sister, the complainant, has frequently worked in the fields in the Red Sun for 75cts. a day to make money with which to buy them food.

Further the witness saith not.

*Mrs Caty. Mae, Neeley*  
*Mrs Katie Mae. Neeley*

I, Dan Smith, the Commissioner named in the attached commission, hereby certify that I caused the above witnesses to come before me at the office of G.B. Cleveland, 60 1/2 N. Royal St., Mobile, Ala., on August 19th, 1935, at 1:10 P.M. and they were made known to me to be the identical witnesses named in the commission. They testified as set out and I caused the same to be reduced to typewriting and they signed the same in my presence after reading the depositions over first. I am not of kith nor kinto the parties to this suit, nor in any wise interested in the result thereof.

*Dan Smith*  
Commissioner.

THE STATE OF ALABAMA, }  
Baldwin County.

No. 240 Circuit Court, In Equity

~~Annie Belle Carpenter~~ Complainant  
vs.

~~Sam Carpenter~~ 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.

~~In Account of Quality~~

It is further ordered that the said ~~Annie Belle Carpenter~~ be, and he 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 ~~Annie Belle Carpenter~~ 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 be issued against the said ~~Sam Carpenter~~

It is further ordered, adjudged and decreed that said ~~Annie Belle Carpenter~~ shall not again marry except to said ~~Sam Carpenter~~ until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said ~~Sam Carpenter~~

It is further ordered, decreed and adjudged that ~~Annie Belle Carpenter~~ during the said pendency of appeal have the sole care, custody, and control of the said minor children of this marriage, to-wit: ~~Hall Carpenter, Pauler Carpenter, Anna Maria Carpenter, Ralph G. Carpenter, Dolores Carpenter, and James Carpenter,~~ subject to the further orders of this Court.

This 20th day of August 1935

F. W. HARE  
Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, }  
Baldwin County.

Circuit Court, In Equity.

I, ~~Robert S. Bush~~ 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 \_\_\_\_\_ 193 in the cause of \_\_\_\_\_

~~Annie Belle Carpenter~~ Complainant  
vs.

~~Sam Carpenter~~ Defendant  
as appears of record in said Court.

Witness my hand and the seal of said Court, this the \_\_\_\_\_ day of \_\_\_\_\_ 193

Register

RECORDED  
*Arch*

146

No. 146

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY  
Baldwin County, Ala.

VS.

DECREE OF DIVORCE

Filed in office this

day of \_\_\_\_\_ 193

REGISTER

E. O. M. *Ma* 2 193

MOORE PRINTING CO., BAY MINETTE, ALA.