

Circuit Court, In Equity

-, Complainant

vs.

, Respondent

Answer and Waiver

Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the 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 that the

said Lois V. Harrison is forever divorced from the

said Lloyd Harrison for and on account of

Abandonment. IT IS FURTHER ORDERED that the care, custody and control of the three minor children of the marriage, namely, Jene Harrison, Margaret Harrison and Charles Harrison, is hereby awarded to Lois V. Harrison, the Complainant, and that she be awarded the sum of Five Dollars (\$5.00) per month for each child as support and maintenance. IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, Lloyd Harrison, be granted the right to semi-annually visit said children at reasonable times and that the Court retain jurisdiction of the cause for such other or further orders as may be from time to time found necessary.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Lloyd Harrison
the Respondent pay the cost herein to be taxed, for which execution may issue.

This 6th day of June, 1950

Telford A. Mallbury Jr.
Judge Circuit Court, In Equity

I, _____ Register of the Circuit

Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day

of _____, 19_____

Register of Circuit Court, In Equity.

RECORDED

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

2425

PEEK & PEEK
ATTORNEYS AT LAW
92 EASTVIEW AVE. P.O. Box 147
VALPARAISO, FLORIDA 32580
PHONE (904) 678-1178

HAROLD F. PEEK, JR.
SAMUEL M. PEEK

October 7, 1983

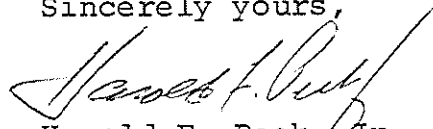
Clerk of Court
Bay Minette, Alabama 36507

Re: Estate of Lloyd Harrison

Dear Sir:

I am representing Mrs. Lois B. Harrison in attempting to collect some back child support from her husband's estate. Could you please give me a complete copy of the Court file. Attached is a copy of the Final Judgment entered on the 6th of June, 1950. If there is any charge for the Court file, please advise.

Sincerely yours,


Harold F. Peek, Jr.
Attorney-at-Law

HFP/lra
Enclosure
cc: Lois B. Harrison

** Mailed 10/17/83*

CIRCUIT COURT
BALDWIN CO., ALA.
FILED

OCT 12 1983

EUNICE G. TINDALL
REGISTER

The State of Alabama, Baldwin County

Circuit Court, In Equity

LOIS V. HARRISON

Complainant

vs.

LLOYD HARRISON

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~and Bill of Answer~~

Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the 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 that the

said Lois V. Harrison is forever divorced from the said Lloyd Harrison for and on account of

Abandonment. IT IS FURTHER ORDERED that the care, custody and control of the three minor children of the marriage, namely, Jene Harrison, Margaret Harrison and Charles Harrison, is hereby awarded to Lois V. Harrison, the Complainant, and that she be awarded the sum of Five Dollars (\$5.00) per month for each child as support and maintenance. IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, Lloyd Harrison, be granted the right to semi-annually visit said children at reasonable times and that the Court retain jurisdiction of the cause for such other or further orders as may be from time to time found necessary.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Lloyd Harrison the Respondent pay the cost herein to be taxed, for which execution may issue.

This 6th day of June, 1950.

Delfair J. Mathis
Judge Circuit Court, In Equity

I, Eunice G. Tindal, Register of the Circuit

Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the 5th day of May, 1983

Eunice G. Tindal
Register of Circuit Court, In Equity.

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2425

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LLOYD HARRISON

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

LLOYD HARRISON, Defendant

by LOIS V. HARRISON

, Plaintiff

Witness my hand this 1st day of February 19 50

Archie J. Hatcher, Clerk

RECORDED

No. 2125

Page

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

LOIS V. HARRISON

Plaintiffs

vs.

LLOYD HARRISON

Defendants

SUMMONS and COMPLAINT

Filed Feb. 1, 1950

ALICE J. DICK, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19

, Sheriff

I have executed this summons

this

, 19

by leaving a copy with

Sheriff

Deputy Sheriff

LOIS V. HARRISON,)
 Complainant,) IN THE CIRCUIT COURT OF
 -vs-) BALDWIN COUNTY, ALABAMA
 LLOYD HARRISON,) IN EQUITY
 Respondent.)

TO THE HONORABLE TELFAIR J. MASHBURN, JR.; JUDGE OF THE CIRCUIT
 COURT OF BALDWIN COUNTY, Sitting in Equity:

Your respondent, Lloyd Harrison, respectfully represents
 and shows to your Honor the answer to complaint # 2425 as follows:

1.
Denied.
2.
Denied.
3.
Denied.
4.
Denied.
5.
Denied.
- 6.

In further reply to aforesaid complaint Respondent states:

7.

That Respondent did on or about January 18, 1949 at 110
 New St., Asheville, N. C. help fill a large truck with household
 goods, furniture and trunks among which were one large Wardrobe
 trunk and a smaller flat trunk both filled at one time with be-
 longings of Respondent, clothes, writings and miscellaneous per-
 sonal property of Respondent; and seeing Complainant and Com-
 plaintant's 4 children, Katherine, 13, Gene, 7, Margaret, 6, and
 Charles, 4, seated in the truck, Respondent did bid Complainant
 and children God speed and farewell when the truck departed bound
 for Summerdale, Alabama.

8.

That because Respondent had received anonymous letters through the mail threatening the safety of Complainant and children if they remained in Asheville this move at that time appeared wisest to Respondent.

9.

That Complainant had told Respondent many times that she would rather be in Alabama destitute and unemployed than with Respondent anywhere else with all Respondent could provide for her!

10.

That Respondent did remain in Asheville, N. C. at the request of Complainant to sell a small piano belonging to Katherine, oldest daughter of Complainant.

11.

That when following Respondent's promise to repay the \$100. to Miss Gene Harrison, Aunt of Complainant by or before July, 1949; Complainant did receive on or about Jan. 14, 1949 a money order for \$100. made out to Complainant the most of which was used as partial payment for transporting furniture, Complainant and children to Summerdale with Complainant keeping the remainder of the \$100. or about \$20. for miscellaneous traveling expense while en route from Asheville to Summerdale.

12.

That when Respondent stayed behind in Asheville at the request of Complainant Respondent had less than \$10. in money in his possession.

13.

That upon arrival at Summerdale Complainant did borrow an additional \$79. to finish paying transportation charges and with the understanding that Respondent would repay this along with the first \$100.

14.

That on or about January 21, 1949 Respondent did sell for \$45. the piano owned by Katherine, Complainant's daughter.

15.

That on the night of January 25, 1949 while Respondent was visiting his cousin overnight at Biltmore, N. C. the 9 room house at 110 New Street, Asheville, property of Complainant and Respondent was seriously damaged by fire, origin unknown and among the fire losses were most of Respondent's clothes that Complainant had not taken with her to Summerdale.

16.

Your Respondent further states that in his entire association with Complainant the one and only time Respondent did ever strike Complainant was when while Respondent was correcting Charles Complainant did interfere and in so doing swung her arms in anger and exasperation at Respondent and strike him with apparent intent to harm Respondent, following which Respondent did swing his right arm and pushingly move with open hand Complainant from near him. Furthermore that Complainant did not fall to the floor because of the one shove or push and following an apologetic plea from Respondent to Complainant that she never again strike him in anger Complainant and Respondent did kiss and make up.

17.

That Respondent has never at any time made any threats of physical violence toward Complainant but has always loved her and even when Complainant's acts were harmful to Respondent if there was any other feeling besides love for Complainant it was one of pity because Complainant did not understand.

18.

That from the time Respondent did assume the support of

Complainant and Complainant's daughter, Katherine, then aged 5, which was in July, 1942 Respondent has at all times provided for his family to the very best of his ability and up to January, 1949 did each and every week supply them with the maximum possible for Respondent to furnish them no matter what was left for himself or where he was at.

19.

That when Respondent sent Complainant and children to Summerdale he understood it was only to be about a 6 month stay, just a temporary sanctuary for them until Respondent could again get his family with him again.

20.

That Miss Gene Harrison had assured Respondent that Complainant could get enough employment as an extra school teacher at nearby schools to support herself and family and with Complainant and children sharing the Miss Gene Harrison home they were assured of a livelihood by Miss Gene Harrison until Respondent could repay the borrowed money and clear up the debris of law-suit trouble which had so involved the Asheville property.

21.

That following hasty arrangements for the repair of the fire's damages Respondent went to New York and back to work.

22.

That in the period from Feb. 1949 to June 10, 1949 Respondent did mail to Summerdale his personal checks as listed:

(a)	Miss Gene Harrison, Sr., about 2-25-'49	\$75.
	Repayment on loan principal	
(b)	Miss Katherine Rice, about 2-25-'49	\$50.
	Pay for Piano sale, plus \$5. Interest	
(c)	Miss Gene Harrison, Sr., about 3-1-'49	\$27.
	\$25. Principal repayment plus \$2. Interest	
(d)	Miss Gene Harrison, Sr., about 5-2-'49	\$30.
	\$29. Principal repayment plus \$1. Interest	
(e)	Miss Gene Harrison, Sr., about 6-10-'49	\$26.
	\$25. Principal repayment plus \$1. Interest	
	Total	\$208.

23.

That on or about June 15, 1949 Miss Gene Harrison, Sr., the Aunt of Complainant did write a letter to Respondent demanding that he pay her \$75. to \$100. a month board for Complainant and Complainant's children failing which Respondent would not be allowed to repossess any of his belongings in Summerdale, would not be allowed any say at all in things pertaining to the welfare of the children and concluded by demanding that Respondent either pay the demanded amount of money at once or "Step out of the picture entirely".

24.

That because Respondent did not have this amount of money he could not pay it to Miss Gene Harrison, Sr.

25.

That despite the unfair demands of Miss Gene Harrison, Sr., Respondent did on June 17, 1949 mail to said Gene Harrison, Sr., a check for \$26. (\$25. Principal, \$1. Interest) which did repay in full the transportation costs of \$179. plus \$5. Interest on the money, said Interest figured at about six percent.

26.

That in the interval from March 1, 1949 to May 20, 1949 Respondent did return to Asheville and spend about three weeks there in an effort to salvage by sale something on the 110 New Street property owned jointly by Complainant and Respondent.

27.

That the effort was unsuccessful and when last heard of Complainant did have the deed to the 110 New Street property, said deed endorsed by both Respondent and Complainant.

28.

That Respondent is now unemployed and has been unemployed since Jan. 19, 1950 at which time his employment at Hotel Homestead was terminated consequently Respondent's sole income at this time

is unemployment insurance paid by New York State.

In conclusion Respondent respectfully requests that your Honor understand that he has no employment chances in Alabama and that the employment chances which exist for Respondent are just as emphatically in New York as the employment chances of Complainant do exist in Alabama. Furthermore that in November and December, 1949 at which time Respondent was employed, Respondent did arrange for Mrs. Eliza Johnson, Asheville, N. C. to write and tell Complainant that Respondent was anxious, willing and able to pay Complainant's fare and Complainant's children to New York where he would again assume support of his family. In addition Respondent did also arrange with Mrs. Josephine Hoban of New York City to write and tell Complainant of Respondent's desire to get his family together again in New York. That both Mrs. Johnson and Mrs. Hoban did write to Complainant as arranged and requested by Respondent and although Complainant answered both letters no mention was made either of Respondent's offer or request to either Mrs. Johnson or Mrs. Hoban. That on December 24th, 1949 Respondent did send the following telegram to Complainant:

BROOKLYN, N. Y.

"Telephone Personally
at 12 noon

Mrs. Lois Harrison,

Care of Troyers Funeral Home, Foley, Alabama.

I love you. Can't we let bygones be gonebys and you and the children join me here so we can be a family again?

Lloyd"

That when early in January no reply had been received to the telegram which Western Union assured Respondent was delivered as requested Respondent did send another copy of the same telegram via Air Mail to Complainant's brother-in-law, Roy Holmes, asking him to hand said telegram to Complainant along with a n Insurance premium receipt belonging to Complainant but sent in error to Respondent by the Insurance Company.

That Respondent did later receive a letter from Complainant's brother-in-law but no mention was made either of the telegram nor the Insurance receipt but by this time Respondent was beginning to understand the meaning of such actions.

REQUEST FOR CONSIDERATION

The foregoing considered, your Respondent prays that the Court will attempt to understand what Respondent is unable to understand; to-wit, how A N Y O N E can place a premium on a broken family or collection of parts of broken families now gathered in Alabama!! By promising not to use it unless there was no, ABSOLUTELY no other way open Respondent did obtain evidence which will be accepted as bona fide by any Court of law that the reason for Complainant's September, 1941 divorce decree from ex-husband, Harold F. Rice was the same B A S I C reason making this divorce action between Complainant and Respondent appear necessary at this time!! That the method used on the first divorce action start was the same as used this time, i. e., a trip to Alabama, to be a visit in the beginning but ending in an uncontested divorce decree because no support was asked in that action. Should the Court find that Complainant needs additional encouragement to go with what she has been getting it is hoped the Court will grant it to Complainant. In the future, as in the past, Respondent will continue to do the best he knows how and it is hoped Respondent's lack of knowledge and subsequent mistakes in presenting this reply will be condoned since the Unemployment checks paid by New York State are not large enough to employ legal counsel to prepare a more correct answer to Bill of Complaint.

Respectfully Submitted,

Lloyd Harrison
Respondent.

RECORDED

FILED

FEB 13 1950

ALICE J. DUCK, Register

Memorandum

Brooklyn, New York
General Delivery

March 8th,

Alice J. Duck,
Circuit Clerk,
Baldwin County,
Bay Minette, Alabama

Re Complaint No.
2425

Dear Clerk:

In further reference to the Complaint listed above to which your receipt shows an Answer was received on February 13th undersigned Respondent respectfully requests that the trial date of this case be moved forward 60 days so that duplicate copys of pertinent papers needed for authentic defense presentation may be obtained by said Respondent.

Undersigned had hoped that this request would not be needed else he would have so written before but due to circumstances beyond his control there is no other alternative but to ask for the postponement for while Respondent does not oppose the issuance of more divorces in this case he does wish to provide the three minor children involved, Gene, 7, Margaret, 6, and Charles 4, with the protection which they are deserving of receiving when the issue is decided by the Court.

Could I hear from you?

Very Sincerely,

Lloyd Harrison
Respondent

LOIS V. HARRISON

vs.

LLOYD HARRISON

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint,

and Testimony of Lois V. Harrison and Katherine Rice

and in behalf of Defendant upon answer and waiver

[Signature]
 Solicitor for Complainant

[Signature]
 Register.

RECORDED

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

LOIS V. HARRISON

vs.

LLOYD HARRISON

NOTE OF TESTIMONY

Filed in Open Court this *24th* *May* *1940*

day of *May*, 19*40*

Alfred French
Register.

Printed By The Baldwin Times

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Lorna Underwood

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 Lois V. Harrison and Katherine Rice

as witnesses in behalf of Lois V. Harrison in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Lois V. Harrison is

_____, Complainant

and Lloyd Harrison is

_____, Respondent

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

Witness 18th day of May, 194 50.

Commissioner's Fee, \$ 5.00

Witness' Fees, \$ _____

Amie J. Wicks
Register.

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

LOIS V. HARRISON

Complainant

VS.

LLOYD HARRISON

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Lorna Underwood

WITNESSES:

Lois V. Harrison

Katherine Rice

THE STATE OF ALABAMA }
Baldwin County

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

LOIS V. HARRISON

COMPLAINANT

vs.

LLOYD HARRISON

RESPONDENT

I, Lorna Underwood

as Register and Commissioner in chancery

have called and caused to come before me Lois V. Harrison and Katherine Rice

witnesses named in the requirement for Oral Examination, on the 19th day of May

1945, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Lois V. Harrison and

Katherine Rice doth depose and say as follows:

TESTIMONY OF LOIS V. HARRISON:

My name is Lois V. Harrison; I am over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, having been such a resident for more than one year prior to filing my bill of complaint for divorce; Lloyd Harrison is over the age of twenty-one years and is believed to be a resident of New York State; we were married on October 4, 1941, and there was born of our marriage three children, Jean Harrison, age seven; Margaret Harrison, age six; and Charles Harrison, age 4; in January of 1949, my husband voluntarily abandoned my bed and board and since that time we have not lived together as man and wife; since that time he has failed and refused and continues to fail and refuse to provide a home for me as a wife, and this abandonment was without cause on my part; a short time prior to the abandonment my husband did hit and beat me so that I was bruised and injured and he has made other threats of doing me physical harm and from his manner and conduct I was convinced that he would commit other and further actual violence on my person attended with danger to my life and health; our children above named have been in my complete care, custody and control since the abandonment of my husband; I believe my husband to be financially able to support these children but am agreeable, in the event he is not financially able to pay \$60.00 per month as support, to have this amount reduced according to his ability to pay, but to a minimum of \$15.00 per month.

Lois V. Harrison

TESTIMONY OF KATHERINE RICE:

My name is Katherine Rice; I am almost fourteen years of age and the daughter of Lois V. Harrison; I lived with my mother and her husband, Lloyd Harrison, and their children; I have seen Lloyd Harrison strike my mother and hit her; In January of 1949, he left her with no money and no means of support and with no cause; he has not support my mother or provided a place for her to life since that time and they have not lived together since that time.

Katherine Rice

I, Lorna Underwood as 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 es and read over to them and they signed the same in the presence of myself and and C. G. Chason at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; 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 May 1945.

Lorna Underwood (L. S.)

No. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

LOIS V. HARRISON

COMPLAINANT

vs.

LLOYD HARRISON

RESPONDENT

ORAL DEPOSITION

Filed 2-24, 1945

RECORDED IN

Register.

Record

Vol. _____ Page _____

, Register

610 West 164th Street
New York, 32, New York

March 8th,

Mr. J. B. Blackburn,
P. O. Drawer 59,
Bay Minette, Alabama

Dear Sir:

The Legal Aid Society here gave me your address when I consulted them about a legal matter and they suggested you as a possible legal representative in Bay Minette. I am the Respondent in Complaint No. 2425, Lois V. Harrison vs. Lloyd Harrison, said complaint filed at Bay Minette Feb. 1, and a Reply to the Complaint was received by the Clerk on Feb. 13th after service was accepted Feb. 4th.

I am this date writing to the Clerk, Bay Minette requesting that the trial date of this case be set forward 60 days so the Respondent can obtain duplicate copys of pertinent papers to more correctly present Respondent's contention as well as earn enough money to make the trip from New York City to Alabama.

At no time do I wish to contest the issuance of another divorce by the Court to the Complainant but I do seek the help of the Court to prevent a repetition of what has happened. If my present information is correct my three children by the Complainant, Gene, 7, Margaret, 6, and Charles, 4 stand a very good chance of being subjected to wilful neglect because of the continued refusal of Complainant to accept offered support by Respondent to Complainant and children.

If something of a compromise could be worked out whereby I can be allowed to visit my children on a neutral meeting ground say two times each year I shall consider it a privelege to con-

tribute to the support of my children providing that an individual living outside of the house where Complainant and children are now residing can be persuaded to handle monies so contributed by Respondent since he knows enough of the nature both of Complainant and Complainant's Aunt to not trust their judgment in matters like this.

My chief purpose now is to find out what your fee would be to represent me in this matter if it can be amiably settled out of court? Also what would your fee be if you represented me and as a last resort a personal appearance there by the undersigned appeared advisable and it becomes necessary to take one or all of the children out of the custody of their mother? This last is only to be considered as a last resort but my children are entitled to more protection than the child of the Complainant's first marriage received at the hands of the Court and knowing full well that there is N O T H I N G Respondent can possibly gain by any such action of his Respondent will only pursue this course in order to get the Court's protection for his children.

Could I hear from you?

Yours Sincerely,


Lloyd Harrison

LOIS V. HARRISON,

Complainant,

-vs-

LLOYD HARRISON,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, Sitting in Equity:

Your complainant, Lois V. Harrison, respectfully represents
and shows unto your Honor:-

1. That complainant is over the age of twenty-one years
and is a resident of said State and County, and has been a bona
fide resident of said State for more than one year next preceding
the filing of this Bill of Complaint; that Lloyd Harrison is over
the age of twenty-one years and is a non-resident of the State of
Alabama, his last known post office address being General Delivery,
Brooklyn, New York.

2. That your complainant and respondent were lawfully
married on or about, to-wit, October 4, 1941.

3. The complainant further avers that said respondent
voluntarily abandoned the bed and board of the complainant for more
than one year next preceding the filing of this Bill of Complaint
since which time complainant and respondent have not lived together
as man and wife, nor in any way recognized each other as husband
and wife.


4. Your complainant further avers and charges that the
said respondent did assault, beat, hit and strike complainant; that
said respondent has committed actual violence on her person attended
with danger to her life or health; complainant avers and charges that
respondent has made numerous threats of doing her physical harm and
from his manner and conduct toward her, she is reasonably convinced
that he would commit an actual violence on her person attended with
danger to her life or health.

5. Complainant further shows unto your Honor that there
were born to your complainant and the respondent three children,
Jene Harrison, age seven; Margaret Harrison, age six; and Charles
Harrison, age four years, which said children have been in the care

and custody of your complainant during the separation and abandonment of your complainant, and which children respondent is financially able to support by payment of the sum of Sixty Dollars (\$60.00) per month.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your complainant prays that Lloyd Harrison be made a party defendant to this cause by the usual process of this Honorable Court requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that service be had upon the respondent by registered mail with return receipt requested as provided by the statutes and rules of this Court; that upon a final hearing of this cause that your complainant be granted a divorce from said respondent and that your Honor will grant to the complainant legal custody of the minor children of this marriage, Jene Harrison, Margaret Harrison and Charles Harrison, and will direct the respondent to pay the sum of Sixty Dollars (\$60.00) per month as support for said minor children. Should your complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

LOIS V. HARRISON,
Complainant,

VS.

LLOYD HARRISON,
Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

ANSWER AND WAIVER.

Now comes the Respondent in the above styled cause and accepts service of a Bill of Complaint heretofore filed in said cause, waives notice of the taking of testimony in said cause, consents that the same may be taken and the cause submitted for final decree without further notice.

And for answer to the Bill of Complaint heretofore filed in this cause Respondent says:

1. He admits the allegations contained in Paragraph One of the said Bill of Complaint.

2. He admits the allegations contained in Paragraph Two of the said Bill of Complaint.

3. He denies each and every allegation contained in Paragraph Three of the said Bill of Complaint, and demands strict proof thereof.


4. He denies the allegations contained in Paragraph Four of the said Bill of Complaint, and demands strict proof thereof.

5. He denies the allegations contained in Paragraph Five of the said Bill of Complaint, and demands strict proof thereof.

Lloyd Harrison
Respondent.

RECORDED

*Filed 6-6-50
Ainsworth
Register*

Neville, Fla.
May 2, 1983

Dear Ms Lindal,

Enclosed please find money
order for \$3.00, for which please
send me 2 certified copies of my
divorce decree - divorce from
Lloyd Harrison - issued 6th day
of June, 1950.

Sincerely,

Lois V. Harrison

RECEIPT FOR REGISTERED ARTICLE No.

678

X fee paid. *1* class postage paid. *2-1*, 19 *50*

Declared value, \$ *none* Surcharge paid, \$ *none*

From *Chas. J. Duck*

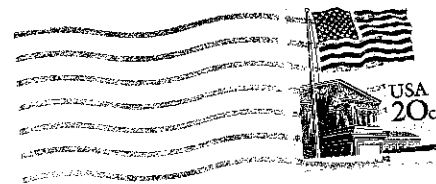
Addressed to *Gen. Bill S. Brown*

Accepting employee will place initials in space below, indicating restricted delivery.

Return receipt fee *5* Special delivery fee *20*
Delivery restricted to addressee *in person* Postmaster, per *20*
or order
Fee paid



Lois V. Harrison
1044 47th St.
Niceville, Fla.
32578



Copy!

Eunice Lindal
P.O. Box 489
Bay Minette, Ala. 36507

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300
(GPO)

POSTMARK OF DELIVERING
OFFICE

Return to Acie J. Smith
Street and Number, } (NAME OF SENDER)
or Post Office Box, }

REGISTERED ARTICLE

No. 628 Post Office Bay Minette

INSURED PARCEL

No. _____ State Ala.

16-12421

Form 3811
Rev. 1-4-40

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article the original number of which appears on the face of this Card.

1

Lloyd Hanson
Deliver to Addressee

(Signature or name of addressee)

2

(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery FEB 4 1950, 194

U. S. GOVERNMENT PRINTING OFFICE 16-44221

FILED
FEB 7 1950
REGISTERED