

Complainants copy

State of Alabama, Baldwin County.

Blanche Allen }  
Complainant } In the Circuit Court for  
vs. } Baldwin County, Alabama  
Wilbur Allen }  
Respondent } In Equity.  
Petition for Early Hearing

To the Honorable W. F. Hare Judge of  
said Circuit:

Comes now Wilbur Allen the respondent  
in the above entitled cause and prays  
the court for an early hearing of said  
action and for cause says that:

Blanche Allen the complainant in  
the above action is and has been since  
June 1934, living in adultery with  
one Wesley D. Owens a married  
man of Atmore, Escambia County  
Alabama.

That said Blanche Allen and Wesley  
D. Owens did make several trips  
together to Moss Point, Mississippi and  
Pascagoula, Mississippi, posing as  
husband and wife for immoral purpose

That said Blanche Allen did on numerous occasions go with the said Wesley D. Owens to his houseboat on the Fish river in Baldwin County, Alabama for a night of debauchery and fornication.

That the said Blanche Allen has received from the said Wesley D. Owens dresses, shoes, underwear, lingerie and other articles of clothing.

That on several trips the said Blanche Allen and Wesley D. Owens did take with them the fourteen year old daughter Lucy, of said Blanche and Wilbur Allen, to be used as a foil and decoy for their nights of debauchery.

That the said Wesley D. Owens did give to said daughter Lucy, dresses, shoes and other wearing apparel.

That the respondent fears that the said Wesley D. Owens and Blanche Allen will ruin and disgrace said daughter Lucy by leading her into a life of shame.

That on the twenty fifth day of October 1935, the respondent together with one Richard Roe, taken along as a witness did find the said Blanche Allen the

complainant in this case and Wesley D. Owens, in bed together in room number eight of the Karnock Hotel at Fairhope, Baldwin County, Alabama at ten thirty o'clock, P. M. both without any clothes on and having sexual intercourse.

That since the service of summons on the respondent in the above entitled case the complainant has had sole custody of all the children, that she is setting a horrible example before the children, they refer to Wesley D. Owens as their mothers "sweet papa".

That said Blanche Allen is morally unfit to have the custody and care of said minor children.

Wherefore, the respondent prays the court that an early date may be set for the hearing of this action, that the respondent be given the legal custody of the five minor children, that the case be dismissed at the cost of the complainant, and such other relief as the court may in equity and justice deem the respondent entitled to.

Wilbur Allen

Respondent

RECORDED  
State of Alabama  
Blount County  
6-20-33

Charles Allen  
Complainant  
vs

Wilbur Allen  
Respondent

In Equity  
Petition by Respondent  
for  
Early Hearings

J. S. [Signature]

Filed this 9 day of  
November 1935  
Cato  
Registrar.

153

153

OFFICE OF  
SHERIFF BALDWIN COUNTY

M. H. WILKINS, SHERIFF

Bay Minette, Alabama

153

Blanket Billie  
Complaint

Wilson Reese  
Respondent

In the Sheriff's  
Court of Baldwin  
County, Alabama

In Equity

Answer  
to

Bill of Complaint

Filed this 15 day of  
September 1935

Richard Deek

copy to  
Billie Reese

Filed this 18 day of September 1935  
Richard Deek  
Clerk-Register

OFFICE OF  
SHERIFF BALDWIN COUNTY

M. H. WILKINS, SHERIFF

Bay Minette, Alabama

RECORDED  
6-202

Blanche Allen  
Defendant

vs

William Allen  
Respondent

In the  
County of Baldwin  
Baldwin County,  
Alabama.

In Equity

Answer  
to Bill of English

At this 18 day of  
September 1935  
Robert S. Duchs

Fairhope, Ala.  
17, Sept. 1936

Mr. Robert S. Duck,

Bay Minette, Ala.

Dear Mr. Duck,

Enclosed find waiver that we were talking about when I last saw you. It has taken me some time to get the few pennies required but finally managed it.

Now it is to be distinctly understood that the respondent is to pay no court costs in this matter nor any attorney fees.

By letting the complainant have what she wants we may be able to remain better friends than the way things are at present. I thank you,

Sincerely,

Wilbur Allen

IN THE CIRCUIT COURT OF BALDWIN COUNTY ALABAMA.

BLANCHE ALLEN  
Complainant

VS

IN EQUITY

WILBUR ALLEN  
Respondent WAIVER

BEFORE HON. F. W. HARE JUDGE OF SAID CIRCUIT.

Comes now Wilbur Allen the respondent in the above  
entitled action and for cause says that; he waives all  
hearing in the above cause.

Wilbur Allen  
Respondent.

Sworn to and subscribed before me a Notary Public in and  
for said Baldwin County, Alabama, this 17th day of  
September, 1936.

Loe L. Plopha  
Notary Public



RECORDED

*Arch*

6-527

153

BLANCHER ALLEN

VS

WILBUR ALLEN

IN EQUITY

WAIIVER

*Filed Sept 18/1930  
R. R. Lusk  
Request*

and defend his interests in the above mentioned cause personally to the best of his ability.

Sixth: That each and every allegation in the Bill of Complaint filed against Wilbur Allen, respondent in this cause not specifically admitted is denied, in toto, and that this cause is brought simply to harass and injure the respondent and to deprive him of the companionship of the children.

Seventh: That the complainant, Blanche Allen did on or about September 10<sup>th</sup> 1935, maliciously conspire with one Clayton Baldwin and Wesley D. Owens to deprive the said respondent, Wilbur Allen of his liberty and cause him to be confined in the county jail of Baldwin county at Bay Minette.

Wherefore; Respondent prays that your Honor will dismiss this action, at the cost of the complainant, and grant any other relief to which your Honor in justice and equity may deem the respondent entitled.

Wilbur Allen  
Respondent.

Blanche Allen  
vs  
Wilton Allen  
Respondent

In the Circuit Court of  
Baldwin County, Alabama  
In Equity  
Answer.

To Honorable F. W. Hays, Judge of the Circuit  
Court of Baldwin County, Alabama, In Equity

Comes now the respondent, Wilton Allen, in the  
above entitled cause and for answer presents  
unto your Honor and this Honorable Court the  
following facts, to wit:

- First: Respondent admits that both parties to this  
action are residents of Baldwin County, Alabama  
and over twenty-one years of age.
- Second: Respondent admits that he was married to the  
complainant on December 27<sup>th</sup> 1915, but  
denies that it took place in Minneapolis, Minn.
- Third: Respondent admits that they did live together  
as husband and wife until January seventh, 1935.
- Fourth: Respondent admits that there are five  
minor children in the family.
- Fifth: Respondent is without funds to engage  
counsel to protect his interests in this  
cause and is therefore obliged to present

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

WILBUR ALLEN

of BALDWIN COUNTY 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

BLANCHE ALLEN

against said WILBUR ALLEN

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 14th day of August 1935

*Robert S. Duck* Register

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

# CHANCERY EXECUTION

## BILL OF COSTS

No. 153

*Blanche Allen* vs. *Wilbur Allen*

PLAINTIFF

DEFENDANT

| FEES OF REGISTER   | Dollars | Cents | Brought Forward   |         |
|--|---------|-------|---|---------|
| Filing each bill and other papers  | \$ 10   | 60    | For Receiving, keeping and paying out or distributing money, etc.: 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%. | \$ 3 80 |
| Issuing each subpoena  | 50      | 30    | Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.  |         |
| Issuing each copy thereof  | 40      | 40    | Each notice sent by mail to creditor  | 15      |
| Entering each return thereof   | 15      | 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 100 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      |       |   |         |
| Docketing each case  | 1 00    | 1 00  | <b>TOTAL FEES OF REGISTER</b>   |         |
| Entering each appearance   | 25      | 30    |   |         |
| Issuing each decree pro confesso on per ser.   | 1 00    |       | <b>FEES OF SHERIFF</b>  |         |
| Issuing each decree pro confesso on publica  | 1 00    |       | Serving and returning subpoena on deft.   | \$1 50  |
| Each order appointing guardian   | 1 00    |       | Serving and returning subpoena for witness  | 65      |
| Any other order by Register  | 50      |       | Levying attachment  | 3 00    |
| Issuing Commission to take testimony   | 50      |       | Entering and returning same   | 25      |
| Receiving and filing   | 10      |       | Selling property attached   |         |
| Endorsing each package   | 10      |       | Impanelling Jury  | 75      |
| Entering order submitting cause  | 50      |       | Executing Writ of possession  | 2 50    |
| Entering any other order of court  | 25      |       | Collecting execution for costs  | 1 50    |
| Noting all testimony   | 50      |       | Serving and returning sci. fa., each  | 65      |
| Abstract of cause, etc.  | 1 00    |       | Serving and returning notice  | 65      |
| Entering each decree   | 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, etc.   | 1 00    |
| Amount claimed less than \$500, etc.   | 2 00    |       | Serving attachment, contempt of court   | 1 50    |
| Issuing each subpoena  | 25      |       | <b>TOTAL FEES OF SHERIFF</b>  |         |
| Witness certificate, each  | 25      |       |   |         |
| Issuing execution, each  | 75      |       | <b>RECAPITULATION</b>   |         |
| Entering each return   | 15      |       | Register's Fees   | 3 00    |
| Taking and approving bond, each  | 1 00    |       | Sheriff's Fees  | 6 50    |
| Making copy of bill, etc.  | 15      |       | Commissioner's Fees   | 3 00    |
| 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  |         |
| Each settlement with Receiver, etc.  | 3 00    |       | Trial Tax   | 3 00    |
| Examining each voucher of Receiver, etc.   | 10      |       | Recording Decree in Probate Court   |         |
| Examining each answer, etc.  | 3 00    |       | <b>TOTAL</b>  | 12 80   |
| Recording resignation, etc.  | 75      |       |   |         |
| Entering each certificate to Supreme Court   | 50      |       |   |         |
| Taking questions and answers, etc.   | 25      |       |   |         |
| For all other ser relating to such proceedings   | 1 00    |       |   |         |
| For services 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 cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent |         |       |   |         |
| Sub Total Carried Forward  |         |       |   |         |

**The State of Alabama,** { No. 153 }  
 Baldwin County { Circuit Court, In Equity } Aug Term, 1937

To any Sheriff of the State of Alabama—GREETING:  
 You are hereby commanded, That of the goods and chattels, lands and tenements of Blanche Allen Defendant—  
 you cause to be made the sum of \_\_\_\_\_ Dollars,  
 which Case dismissed Plaintiff  
 recovered of \_\_\_\_\_ on the 18 day of Aug 1937  
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of 12 80 Dollars,  
 costs of suit, and have the same to render to the said \_\_\_\_\_  
 and make return of this Writ and the execution thereof, according to law.

Interest from \_\_\_\_\_ 1937 to date of collection.  
 Witness my hand, this 22 day of Sept 1937  
Osmond Register

BLANCHE ALLEN,  
Complainant,  
VS.  
WILBUR ALLEN,  
Respondent.

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

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

Comes your Complainant, BLANCHE ALLEN, and humbly com-  
plaining against the Respondent, respectfully represents and shows  
unto your Honor and this Honorable Court as follows:

FIRST:

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

SECOND:

That the Complainant and Respondent were married at  
Minneapolis, in the State of Minnesota, in December, 1915, and  
lived together as husband and wife until, on to-wit, February,  
1935.

THIRD:

That on to-wit, in February, 1935, and various other  
times, the Respondent cursed, abused and threatened your Complain-  
ant, and from his conduct your Complainant has reasonable appre-  
hension to believe, and does believe, that he will carry out his  
threats and do actual violence to her person, which will necessar-  
ily endanger her life and health; that the conduct of the Re-  
spondent is such that the Complainant cannot live with him as his  
wife; that the said acts on the part of the Respondent were com-  
mitted while the Complainant and Respondent were living together

decree will be entered awarding the custody of the said minor children: Wilbur Allen, Lucy Allen, David Allen, Robert Allen and Leslie Allen, to the Complainant; that such permanent alimony as may be just and proper will be awarded to the Complainant, to be paid by the Respondent, as to the Court may seem mete and proper; that your Honor will give and grant unto the Complainant such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

*Beebe & Haef*  
Solicitors for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in this Bill of Complaint, in paragraphs FIRST to FIFTH, but not under oath, oath being hereby expressly waived.

*Beebe & Haef*  
Solicitors for Complainant.

153

153

RECORDED  
and  
INDEXED

BERNICE ALLEN,

Complainant,

VS.

WILBUR ALLEN,

Respondent.

THE ONE CIRCUIT COURT OF

DADE COUNTY, ALABAMA,

IN EQUITY.

BILL OF COMPLAINT.

Filed this 14 day of  
August, 1935.

Robert S. Muck  
Register.





ORIGINAL  
RECORDED  
*Branch*

RECORDED

153

Serve on WILBUR ALLEN

Circuit Court of Baldwin County  
IN EQUITY

No. 153

**SUMMONS**

BLANCHIE ALLEN

vs.

Wilbur Allen

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this 16th

day of Aug, 1935

*Walter S. Perkins*  
SHERIFF

Executed this 10th day of  
August 1935  
by leaving a copy of the within Summons with

*Wilbur Allen*

Defendant

*Walter S. Perkins*  
Sheriff

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

Beebe & Hall  
Solicitor for Complainant

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