

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

Gomes TINY MAYER and by this her bill of complaint presented against JOSEPH MAYER shows:

FIRST: That she and the Defendant above named are both over the age of twenty-one years and are now and have been for more than five years bonafide residents of Baldwin County;

SECOND: That she and Joseph Mayer were lawfully married in November 1923 in Bay Minette, Alabama and have since resided near Silverhill, Baldwin County, Alabama though in the past twelve months they have lived apart the larger partion of the time. That four children, three of them girls, ranging in ages from eleven to four and a half years have been born to said marriage and have been largely supported by Complainant with the help of two children by a former marriage.

THIRD: That after living apart for practically eleven months Complainant at Defendant's request came back to live with him in the early part of September, 1935 but said reconciliation lasted but about a month when Defendant became abusive and threatening, quarrelling with Complainant over the most trival causes and threatening her with personal violence so that she has ~~reason to~~ apprehended danger to life and limb and which belief was confirmed when on or about the fifth day of October Defendant struck Complainant and knocked her down, since which time Complainant has lived separate and apart from him and keeps her oldest daughter around her for fear of further violence.

Complainant further shows that while she has hitherto supported their children out of her own funds that these are now exhausted and Defendant refuses to supply money for food, schooling and clothing for his own children.

**THE PREMISES CONSIDERED,** Complainant prays that Joseph Mayer be made Defendant to this bill of Complaint and by proper process be required to answer same within the time prescribed by law.

Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said Joseph Mayer granting her the right to marry again should she so desire, the sole custody of their four children, Jarmila, aged eleven, Evelyn, aged nine, Joseph, aged eight, and Mildred, aged four and a half years.

Complainant further prays that said decree provide further for a suitable allowance for the support of her and her four children and for counsel fees in the prosecution of this cause, also that she be allowed temporary alimony during the continuation of this litigation.

Complainant further prays that an order be made forthwith directing the Register of this Court to hold a reference and report to the Court a suitable amount to be allowed to Complainant as both temporary and permanent alimony and for counsel fees and that upon said report an order be made requiring the payment of such sums as seem proper to Complainant, both pendente lite and for her future maintenance and support. She further prays that she may have such ~~other~~ further and different relief as to equity may seem meet.

*Elliott S. Rinkley*

Solicitor for Complainant.

CARL HANSELMAN,  
 Complainant.  
 -vs-  
 ANNA H. NAGELE,  
 Respondent.

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 IN CHANCERY

BILL OF COMPLAINT

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN  
 COUNTY, ALABAMA, IN CHANCERY SITTING:

PART ONE

Your complainant, Carl Hanselman, respectfully shows to the Court that he is over the age of twenty-one years and a bona fide resident of the State of Alabama, residing at Elberta in Baldwin County; that the respondent, Anna H. Nagele, is also over the age of twenty-one years and a resident of the State of Alabama, also residing at Elberta, in Baldwin County, Alabama.

PART TWO

1. Your complainant alleges and shows to the Court that he is the owner of and in the actual, peaceable possession, claiming to own the same in his own right, of the following described lands in Baldwin County, Alabama, to-wit:

Lots twelve (12) and thirteen (13) in Block ten (10) in the Village of Elberta, according to the plat thereof recorded in the office of the Judge of Probate of Baldwin County Alabama, in Map Book number one (1) page twenty-one (21) thereof.....

2. That the respondent, Anna H. Nagele, claims or is reputed to claim some right, title or interest in or encumbrance upon such lands and no suit is pending to enforce or test the validity of such title, claim or encumbrance, and your complainant brings this suit to settle the title to such lands and to clear up all doubts or disputes concerning the same.

3. Your complainant calls upon the said Anna H. Nagele to set forth and specify her title, claim and interest or encumbrance in, to and upon said land, and how and by what instrument the same is derived and created.

PRAYER FOR RELIEF

WHEREFORE, your complainant prays that your Honor will take jurisdiction of his cause and will adjudge and decree whether the respondent has any right, title or interest in or encumbrance upon such lands or any part thereof, and will further decree that such respondent has no right, title, interest or encumbrance upon said lands or any part thereof and that the title of your complainant in and to said lands be quieted and confirmed in him, and that your complainant may have such other and further relief in the premises as may be just and equitable.


PRAYER FOR PROCESS

Complainant further prays that your Honor will issue to him the writ of summons of the State of Alabama commanding the respondent, Anna H. Nagele, to appear within thirty (30) days after the service of said writ, then and there to answer all and singular the premises and to stand to and abide such order and decree therein as to this Honorable Court shall seem meet; and your complainant will ever pray & c.

  
Solicitor for Complainant

FOOTNOTE

The respondent, Anna H. Nagele, is hereby required to answer the allegations of part two (2) of the above Bill from section one (1) to section three (3) inclusive, but not under oath, oath to answer being expressly waived.

  
Solicitor for Complainant

CARL HANSELMAN,  
Complainant,  
-vs-  
ANNA H. NAGELE,  
Respondent.

IN THE CIRCUIT COURT--IN EQUITY  
STATE OF ALABAMA  
BALDWIN COUNTY.

Now comes Mrs. Anna H. Nagele, Respondent in the afore-  
said cause, and for Answer to the Bill of Complaint herein filed,  
admits that the allegations contained in the first paragraph of  
said Bill are true and correct.

2nd. Respondent denies that Carl Hanselman is the owner  
of and in the actual, peaceable possession of the real estate  
described in the second paragraph of the Bill of Complaint, and  
states the facts to be that she is the owner of said real estate,  
and that she is in the actual, peaceable possession of the same,  
and that she claims to own the same in her own right.

That the Respondent, Anna H. Nagele, claims to own,  
and does own, in her own right, the real estate described in para-  
graph 2 of the Bill of Complaint, and she admits that no suit  
other than this is now pending to test the title to the aforesaid  
lands. That Respondent acquired this property by Tax Deed from  
the State of Alabama.

Having fully answered the foregoing Bill of Complaint  
Respondent respectfully asks that she be discharged from further  
attendance upon this Court, with her reasonable costs herein ex-  
pended.

  
Solicitors for Respondent.

RECORDED  
FILED  
6-4-21

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ANSWER.

CARL HANSELMAN,

Complainant,

-VS-

ANNA H. NAGELLE,

Respondent.

IN THE CIRCUIT COURT--IN EQUITY

STATE OF ALABAMA

BALDWIN COUNTY.

Filed May 23, 1936

Robert K. Lewis

Register.

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RECORDED  
INDEXED  
6-217

TINY MAYER,

Complainant.

v s

JOSEPH MAYER,

Defendant.

B I L L O F C O M P L A I N T

13  
1937  
*Robert G. Rickaby*  
1937

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ELLIOTT G. RICKARBY  
LAWYER  
ROBERTSDALE, ALABAMA