

THE STATE OF ALABAMA, }  
Baldwin County.

No. 13

Circuit Court, In Equity

E. E. HARRIS

Complainant

vs.

LILLIAN HARRIS

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.

Adultery

It is further ordered that the said E. E. HARRIS 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 E. E. Harris 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 Lillian Harris

It is further ordered, adjudged and decreed that said E. E. Harris shall not again marry except to said Lillian Harris until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Lillian Harris

during the said pendency of appeal

This 27th day of December 1933

J. W. Hare  
Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, }  
Baldwin County.

Circuit Court, In Equity.

I, M. A. Stone 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

Complainant

vs.

Defendant

as appears of record in said Court.

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

Register

3. Your Orator further alleges and states as a fact that the respondent, Lillian Harris committed, acts of adultery with other divers and sundry men, which was done at the time without his knowledge and consent ; that on towit, Sept loth, 1932, the said Lillian Harris went out in a car with ~~me~~, John Elmer Quinley and Bernard Quinley and an other woman, to a place in the woods near Bay Minette on said day and stayed out in the woods some time; that Bernard Quinley and the other woman sat in the car, where they had driven it down an old untraveled road to a place in the woods and Lillian Harris, the said respondent, and John Elmer Quinley, got out of the car and went into the woods and stayed there for something like an half an hour and then came back to the car and then they all returned to Bay Minette.

Wherefore, your Orator prays that the respondent, the said Lillian - Harris, by proper process of this Honorable court be brought before this Honorable court and be directed to answer the charges herein made against her under the rules of this court; that she may be made a party defendant or respondent to this Bill of Complaint and that upon a final hearing of the evidence, your Honor will order, adjudge and decree that the bonds of matrimony heretofore existing between your Orator and the said Lillian Harris be forever dissolved and that your Orator be permitted to marry again and that he be granted such other and further relief as may in all equity and good conscience seem proper and meet to your Honor .

And your Orator will ever pray etc .

Foot Note: S. Jenkins  
Solicitor for the Complainant .

The respondent is required to answer each and every paragraph of the foregoing Bill of Complaint from 1 to 3 inclusive, but her answer under oath is hereby expressly waived .

S. Jenkins  
Solicitor for the Complainant .

E. E. Harris, Complainant  
vs  
Lillian Harris, Respondent

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In The Circuit Court of Baldwin  
County, Alabama.  
In Equity.

To the Honorable Francis W Hare, Judge of the Circuit Court of the Twenty  
First Judicial Circuit of Alabama, which includes Baldwin County:  
The Bill of Complaint of E. E. Harris <sup>(white)</sup> against Lillian Harris <sup>(white)</sup> for divorce  
shows as follows:-

1. That your Orator, the said E. E. Harris, and respondent, the said Lillian  
Harris, are each of the full age of twenty one years and are residents of  
Bay Minette, Baldwin County, Alabama and have resided at said place in  
said county since the year, 1928, when they moved therefrom Greenville  
Alabama in Butler county in said year; that they were legally married at  
Greenville, Alabama, on towit, April 10th, 1923 and they lived together as  
husband and wife until the Fall of the year 1932 and since which time  
, on towit, 15<sup>th</sup> day of *September*, 1932, they have not lived together as  
husband and wife.

2. That during the Fall of the year 1932, your Orator and respondent  
resided in a house in Bay Minette, Alabama, belonging to the Bay Minette  
Land Company and in which house the family of Joe Philpot resided at  
the same time and one Taft Crisell, who was a brother in law of the said  
Joe Philpot, also resided in the same house; that while they were so  
residing in said house in Bay Minette, the respondent began to go out to  
dances and other places with the said Taft Crisell and went out with  
him so often and so openly that she practically took up with the said Taft  
Crisell and to all intents and purposes was living in adultery with the  
said Taft Crisell and this conduct of the respondent became so distateful  
to your Orator that he left her and went to live in a house with one  
Louis Owens and since said time your Orator has not lived with the said  
Lillian Harris; that the said Lillian Harris, the respondent still lives  
in the same house with the said Taft Crisell and goes out openly with him  
just as a man and wife would do and your Orator is informed and believ  
es and as such states and affirms it to be a fact that repondent, the  
said Lillian Harris, is living in an adulterous relation with the said  
Taft Crisell and has so lived since the Fall of 1932 .

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

#13

*E. E. Harris*  
vs.  
*Lillian Harris*

PLAINTIFF

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
<b>Fees of Register</b>			<b>AMOUNT BROUGHT FORWARD</b>		
Filing each bill and other papers		40	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.	3	60
Issuing each Subpoena			Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof		40	Each Notice Sent by Mail to Creditors		
Entering each return thereof		15	Filing, Receiving for and Docketing each Claim, etc		
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	10
Docketing each case		1 00			
Entering each Appearance		25	<b>FEEES OF SHERIFF</b>		
Issuing each Decree Pro Confesso on personal service		1 00	Serving and Returning Subpoena on Deft.	\$1	50
Issuing each Decree Pro Confesso on publication		1 00	Serving and Returning Subpoenas for Witness		65
Each Order Appointing Guardian		1 00	Levying Attachment		3 00
Any other order by Register		50	Entering and Returning same		25
Issuing Commission to Take Testimony		50	Entering and Returning Execution		25
Receiving and Filing		10	Selling Property Attached		25
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 Hundred Words Over Five Hundred		15	Serving and Returning Writ of Exeat		1 50
Taking Account on Reference		3 00	Taking and Approving Bonds, each		1 00
Taking Testimony, etc.		15	Collecting Money on Execution		
Each Report, Five Hundred Words or less		2 50	Making Deed		2 50
For every Hundred Words Over Five Hundred		15	Serving and Returning Application		1 00
Amount Claimed, Less than Five Hundred Dollars, 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		
Taking and Approving Bond, each		1 00	Sheriff's Fees		7 10
Making Copy of Bill, etc.		15	Commissioner's Fees		5 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 for Receiver or Trustee		3 00	Printer's Fees		
Each Settlement with Receiver or Trustee		3 00	Trial Tax		3 00
Examining each Voucher of Receiver or Trustee		10	Recording Decree in Probate Court		
Examining each Answer on Exception		3 00	<b>Total</b>		15 10
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>		3 60			

Received payment this 25 day of Feb 1936 *Patricia Duck*  
Register.

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.

E. E. Harris, Complainant  
vs  
Lillian Harris, Respondent

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In The Circuit Court of Baldwin  
County, Alabama.  
In Equity.

Comes Lillian Harris, the respondent in the above styled cause and for answer to the complaint therein filed on the 15th day of December, 1933, says that she denies every allegation contained therein and demands - strict proof of the same; that she waives service by the sheriff of a subpoena in said cause and notice of any advertisement required by law, notice of the filing of interrogatories or notice of the taking of testimony in the cause either on oral or written examination of witnesses, as well as the right to cross examine witnesses that may be offered by the complainant and consents that this cause may be submitted for a decree on the note of testimony either in term time or in vacation.

Lillian Harris

Witnesses :

Henry Moore  
Bennie Tolman

The State of Alabama }  
 Baldwin County }

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

E. E. HARRIS

COMPLAINANT

VS.

LILLIAN HARRIS

RESPONDENT

I, M. A. Stone

as Register and Commissioner

have called and caused to come before me E. E. Harris, and Joseph Philpot and  
Bernard Quinley

witness<sup>s</sup> named in the requirement for Oral Examination, on the 26th day of December  
 1933, at the office of Circuit Clerk  
 in Bay Minette, Alabama, and having first sworn said witness<sup>s</sup> to speak the  
 truth, the whole truth, and nothing but the truth, the said E. E. HARRIS

doth depose and say as follows:

DEPOSITION OF E. E. HARRIS:

My name is E. E. Harris, and I am the Plaintiff in this cause. I am over the age of 21 years and am a resident of Bay Minette, Baldwin County, Alabama, I have resided here since the year 1928. Lillian Harris, the Respondent, and myself were legally married at Greenville, Alabama, on to-wit: April 10, 1923. And we lived together as husband and wife until the fall of the year 1932. On the 15th, day of September, 1932, we separated as man and wife and have not lived together as such since. Lillian Harris, the Respondent, is over the age of 21 years and is a resident of Baldwin County, Alabama, and has resided in Bay Minette, of said county since the year 1928. When we moved here from Greenville, Alabama. In September 1932, and prior thereto Respondent, Lillian Harris, began to go out to dances and other places with one Taft Crisell, At this time the Respondent and myself were living in a house in Bay Minette, belonging to Bay Minette Land Company, and in which house the family of Joe Philpot resided at the same time. And Taft Crisell, who is a brother-in-law of the said Joe Philpot, also resided in the same

The State of Alabama }  
Baldwin County }

Circuit Court of Baldwin County, Alabama,  
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house. And she practically took up with my wife, Lillian Harris., and went out to places, like dances with her. And before that time she had not been going to dances at all. Her conduct became so open and abandond that I was forced to leave her and go to live with one Louis Owens. And since said time we have not lived together, and I have in no wise or in no manner recoginzed her as a wife since nor in any way condoned her conduct. During this time that we were living in this house my wife , Lillian Harris, went out in car rides with others, and divers persons, and did this openly and in the day time. On the 10th of September , 1932, she went out on car rides with Bernard Quinley , another man and another woman., and were gone-mest- quite a while. I have heard of other incidents of her misconduct. And from these facts I firmly state as a fact that my wife, Lillian Harris, was at this time living in adulterous relations with other men. When I became convinced of this I left her and have had nothing to do with her and have not lived with her since.

In Witness whereof I have hereunto set my hand this 26th, day of December, 1933.

E. E. Harris

DEPOSITION OF BERNARD QUINLEY:

My name is Bernard Quinley. I am 41 years old and I reside at Bay Minette, Alabama. I have known E. E. Harris and Lillian Harris about three years. They are both over the age of 21 and both are residents of Baldwin County , Alabama, and have resided in Bay Minette since I knew them, about three years ago. I knew them when they resided in the house with Joseph Philpot, In September, 1932. On September 10th, 1932, said Lillian Harris went out in a car with John Elmer Quinley, and another woman and myself, . We went out from Bay Minette, to a place in the woods. We drove out in an old untraveled road and stopped the car. Lillian Harris and John Elmer Quinley got out of the car and went into the woods and myself and another woman stayed in the car. Lillian Harris and John Elmer Quinley stayed in the woods and out of sight for something like a half an hour. Then they came back to the car and we all returned to Bay Minette. I know that E. E. Harris and Lillian Harris have separated and they are not living together now as husband and wife.

Bernard Quinley

DEPOSITION OF JOSEPH PHILPOT:

My name is Joseph Philpot. I am 26 years old and a resident of Bay Minette, Baldwin County, Alabama. I have resided here about 12 years. I have known E. E. Harris and Lillian Harris about 7 years. They are both over the age of 21 years and are both residents of Baldwin County , Alabama and have been since I knew them. During the year 1932, and



Baldwin County , Alabama and have been since I knew them. During the year 1932 and prior to September of that year E. E. Harris and his wife, Lillian Harris, lived in the same house in Bay Minette, with my family in a house belonging to the Bay Minette, Land Company. On, to-wit; about 15th of September, 1932, E. E. Harris and Lillian Harris, separated and have not lived together as man and wife. Prior to that time they had lived together as man and wife in Bay Minette ever since I knew them. At the time we lived together in the same house Taft Crisell also lived there as a member of my family, he was my brother-in-law . I state as a fact that Taft Crisell during the time that Harris and Wife lived in this house often went out with Lillian Harris to parties and dances, and I saw them together ofter in company with each other. All this was prior to the time in September when E. E . Harris left his wife, and Prior to this time I had seen them in a room together laying on the same bed. It was in Mrs. Harris's room, when her husband was gone. I saw them do this a number of times. E. E. Harris would be at home a part of the time and part of the time he would be away.

*Joseph, Phiebat*

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8581 NOTE OF TESTIMONY

E. E. HARRIS

vs.

LILLIAN HARRIS

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, .....  
and Waiver of notice of taking of testimony of service by the sheriff  
of subpoena -----etc----- and the Deposition of Witnesses in be-  
half of the Complainant. ....

and in behalf of Defendant upon .....

*M. A. Stone*

Register.