

4

To the Honorable A.E.Gamble,

Judge of the Second Judicial Circuit of Alabama :-

Complainant Salan Kahalley brings this his bill of complaint against Sadie Kahalley, and shows the Court as follows :-

1st. Complainant and said Sadie Kahalley are husband and wife, and have been such for many years. Complainant resides in Baldwin County, Alabama, and said Sadie is a non-resident of Alabama residing, as complainant is informed and believes and thereon states, in the city of Cincinnati, State of Ohio, but at what more particular address complainant is not informed and cannot state. *and same cannot be ascertained after diligent effort.* Complainant and defendant Sadie Kahalley are each of the full age of twenty-one years and upwards.

2nd. Of the marriage between complainant and said Sadie there are two children born to them, one of the name of George aged about 10 years, and the other named Fred. of the age of about eight years. One of these children, to wit, George, is in the custody of complainant, but the other, to wit, Fred., was taken by said Sadie with her when she left as below stated and is now in her charge, as complainant is informed and believes and states, in Cincinnati.

3rd. Prior to October 21st, 1916, said Sadie Kahalley left the city of Mobile, where theretofore she had been residing, and left the State of Alabama, taking said child with her, and has not returned. Said Sadie is distinctly a lewd woman. She has committed acts of adultery with various and sundry persons whose names and the particular places of these offences are unknown to complainant. She has committed adultery and continued an adulterous association with one Joe Abogdela, a Syrian of her own nationality, at or near the town of Atmore in the State of Alabama, to wit, in the Summer of 1916 which complainant but recently learned. She is a woman of such lewd and bad character, violating the rules of marital chastity, and conducting herself in violation of her obligations as a wife, so that she is unfit to have the rearing and custody of either of said two boys.

Prayse.

Wherefore your orator prays that said Sadie Kahalley be duly made a defendant to this bill of complaint and required to answer the same as the law requires.

Complainant prays that on the hearing the Court will enter a decree dissolving the bonds of matrimony between her and this complainant and granting to him an absolute divorce from her .

Complainant further prays that the Court will award to complainant the custody and rearing of each of the two said boys George and Fred. Kahalley, and excluding her therefrom .

And complainant prays for such other aid further or different relief in the premises as in equity and good conscience he ought to have .

And as in duty bound, &c.

*S. C. Jenkins +
P. B. Hobbs*

Solicitors for Complainant .

Foot-Note.

The defendant Sadie Kahalley is required to answer all the averments of the foregoing bill contained in paragraphs one to 3 inclusive, but not under oath . Her oath to her answer is hereby waived.

*S. C. Jenkins +
P. B. Hobbs*

Solicitors for Complainant

The State of Alabama,

Baldwin County .

Before me, T.W. Richerspi, clerk and register of the Circuit Court of Baldwin County, this day came Salen Kahalley, who being sworn says on oath that she is the above named complainant and has read the foregoing bill and that its statements are true ; said Sadie Kahalley is over twenty-one years old, and as complainant is informed and believes and thereon states, she is a non-resident of the State of Alabama, residing in Cincinnati, Ohio, but her more particular or her street address is unknown to complainant.

Salen Kahalley

Subscribed and sworn to before me
this ~~1st~~ 1st Feb 1917.

T. W. Richerspi
Clerk and Register .

RICKARBY & AUSTILL
LAWYERS
909-10-11 VAN ANTWERP BLDG.
MOBILE, ALA.

ELLIOTT G. RICKARBY.
JERE AUSTILL.

March 3, 1916.

Hon. A. E. Gamble,
Greenville, Ala.

Dear Judge Gamble:-

SALIM KAHALLEY VS. SADIE KAHALLEY. Mr. Richerson will hand you with this motion for a reference to ascertain a suitable amount to be allowed as alimony pendente lite and counsel fees in this cause, which bids fair to be actively fought. The papers should also include acceptance of opposing counsel, showing that due notice of the submission of this motion has been given.

We would be glad if you would tell us where we can get a copy of the rules of your Circuit Court, which we understand have been recently formulated.

Yours very truly,

R-V.

Rickarby Austill & Beebe.

We have notified Mr. Jenkins in writing that this motion be submitted to you on the 6th

Since this letter we have been delaying expecting to settle the matter of alimony pendente lite by agreement with opposing counsel, Mr. J. C. Jenkins.

Webster

State of Alabama,)
Baldwin County.)

before me, Thos. W. Richardson, Clerk of the Circuit Court of Baldwin County, personally appeared Salen Kahalley, who being by me first duly sworn, says on oath that he is the complainant in the cause of Salen Kahalley vs Sadie Kahalley, No ----- and that he is informed and believes and upon such information and belief states that Sadie Kahalley is over the age of twenty one years and is a nonresident of the state of Alabama, residing in the state of Ohio and when last heard from was in the city of Cincinnati, in said state of Ohio.

Salen Kahalley

Subscriber and sworn to before me this ~~1st~~ day of ~~February~~ 1917.

Thos. W. Richardson

Clerk of the Circuit Court of Baldwin County, Ala.

IN EQUITY.

SADIE KHALLEY

VS

SADIE KHALLEY.

-:-

ANSWER.

*Filed 3/29/97
J. W. Reardon
Clerk*

RICKARBY & AUSTILL
LAWYERS
2031011 VAN ANTWERP BLDG
MOBILE, ALA

6th. That Complainant has driven respondent from his home and left her absolutely without shelter or means of support, and, but for the kindness of friends, she would have been homeless and destitute, and that, while Complainant has recently arranged to pay her board, it was only when proceedings to that effect had been started in this Honorable Court.

WHEREFORE, the premises considered, respondent prays that this Bill may be dismissed; that an order be made allowing respondent proper counsel fees for defending this cause; that her children may be restored to her, and that she may go hence with her reasonable costs in this behalf expended.

Richard Austill & Bell
Solicitors for Respondent.

R-V.

SALEM KAHALLEY, COMPLAINANT,) NO. _____.
VS.) IN THE CIRCUIT COURT OF BALDWIN
SADIE KAHALLEY, RESPONDENT.) COUNTY, IN EQUITY.

The answer of SADIE KAHALLEY, respondent, to the Bill of Complaint of SALEM KAHALLEY in this cause shows unto your Honor as follows:

1st. Respondent admits the allegations of the first paragraph of the bill as to the marriage and ages of the parties and the residence of complainant but denies that respondent is a non-resident of the State, averring that she is still a resident of the State of Alabama and that her absence therefrom at the time the bill was filed was but a temporary visit to her sister who was ill in Cincinnati.

2nd. Respondent admits the allegations of the second paragraph of the bill as to the names and ages of the two children of their marriage but avers that, since the bill was filed, complainant, by trickery and force, has taken from her the youngest child, Fred, and refuses her access to her children, who are of tender years and need the mother's care.

3rd. Respondent denies emphatically each and every allegation of the third paragraph of the bill.

4th. Respondent says that Complainant himself has been guilty of acts of adultery at various times and places unknown to Respondent and specifically charges him with adultery with a negro woman whose name is unknown to Respondent committed in February and March 1916 in Complainant's store in Mobile; also with a white girl at the same place the following May. He has also frequented houses in the Red Light District in Mobile. Further details of such acts are at present unknown to Respondent, but have not been knowingly condoned by her.

5th. Respondent avers that the charges of improper behavior made against her are untrue and were made for the purpose of obtaining a divorce from her in order that complainant might marry another woman. That complainant has made statements to reputable parties as to his desire to marry a certain girl of whom he is enamored.

Malen Kahalley, complainant)
vs)
No 4)
Sadie Kahalley, Defendant.)

In The Circuit Court of Baldwin
County, Alabama. In the Equity side
of said Court.

In this cause it appearing from an affidavit on file, that the said defendant, Sadie Kahalley is a nonresident of the state of Alabama, residing in the City of Cincinnati in the State of Ohio, when last heard from, it is ordered that the said Sadie Kahalley, plead, answer, or demur, to the allegations of the Bill of complaint filed against her in this cause before the ~~21st~~ day of ~~February~~, 1927 or upon the expiration of thirty days from said date, the same will be taken as confessed against her.

It is further ordered that this order be published once a week for four consecutive weeks in the Baldwin Times, a news paper published at Bay Minette, Alabama.

J. W. Keenan Register.

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE NO. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Chancery Notice #4

Circuit Court of Baldwin County, in Equity.

Selen Kahalley, Complainant

vs

Sadie Kahalley, Defendant.

Chancery Notice.
 Selen Kahalley, Complainant, No. 4.
 vs. Sadie Kahalley, Defendant.
 In the Circuit Court of Baldwin County, in Equity.
 In this cause it appearing, from an affidavit on file, that the defendant, Sadie Kahalley, is a non-resident of Alabama, residing when last heard from in the City of Cincinnati, in the State of Ohio, it is ordered that the said Sadie Kahalley plead, answer or demur, to the allegations of the Bill of Complaint filed against her in this cause, before the 5th day of March, 1917, or upon the expiration of thirty days from said date, the same will be taken as confessed against her.
 It is further ordered that this order be published once a week for four consecutive weeks in the Baldwin Times, a newspaper published at Bay Minette, Alabama.

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	February 1st, 1917	Vol.	27	No.	50
“ “ second “	February 8th, 1917	Vol.	27	No.	51
“ “ third “	February 15th, 1917	Vol.	27	No.	52
“ “ fourth “	February 22nd, 1917	Vol.	28	No.	1

Subscribed and sworn to before the undersigned

this 26th day of February 1917.

Abner J. Smith
Publisher.

Largest Weekly Circulation in South Alabama

Bay Minette, Ala., February 20th, 1917

M

Salen Kahalley, Complainant
vs
Sadie Kahalley, Defendant

Chancery Notice #4
T. W. Richerson, Register,
S. C. Jenkins, Atty for Compl.

THE BALDWIN TIMES

ABNER J. SMITH, PROPR.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

To publishing above Chancery Notice in The Baldwin Times, in issues of Feb 1st, 8th, 15th and 22nd, 1917:.....	\$3.50
--	--------

SAL ~~EM~~ KAHALLEY, COMPLAINANT,)
VS.)
SADIE KAHALLEY, RESPONDENT.)

NO. _____.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, IN EQUITY.

Comes SADIE KAHALLEY, respondent in the above entitled cause, and moves the Court that Complainant be required to pay to her such sum as alimony pendente lite as to the Court shall seem proper, and also a proper and reasonable sum as solicitors' fees for the defence of this suit, she being without means of her own.

Respondent further moves that an order of reference be made requiring the Register of this Court, after proper notice to the Solicitors of the parties, to hold a reference for the purpose of ascertaining proper allowance to be allowed for the purposes aforesaid, and that, upon the filing of such report, a further order be made decreeing the payment of the sum shown proper by such reference.

Oriskany Austell Beebe
Solicitors for Respondent.

We hereby acknowledge receipt of a copy of the above motion and waive further notice of the filing of the same.

D. Jenkins
Solicitors for Complainant.

NO. _____
IN THE CIRCUIT COURT OF
BALDWIN COUNTY;
IN EQUITY.

SALIM KAHALLEY
VS.
SADIE KAHALLEY.

Motion for Alimony and
Counsel fees.

Filed 3/5/17
J. W. Rimmer
clerk.

Rickarby, Austill & Beebe,
Solicitors for Respondent.

SALIE KAHALLEY, COMPLAINANT,)
VS.)
SADIE KAHALLEY, RESPONDENT.)

NO. _____.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, IN EQUITY.

This cause coming on to be heard upon the motion of respondent for an order of reference to ascertain the amounts to be paid by Complainant to Respondent as alimony pendente lite and as counsel fees for the prosecution of this cause, and, it appearing that Complainant has had one full day's notice of such motion, the Register is hereby ordered forthwith to hold a reference at his office in Bay Minette, after giving not less than three days' notice of the time and place to the solicitors of the parties, at which time he will ascertain and report from ~~from~~ the testimony then and there adduced before him a suitable amount to be allowed Respondent as alimony pendente lite, and also what amount would be proper and reasonable as Solicitors' fees for respondent in the defense of this action, making his return thereof to this Court, of which return one day's notice shall be given to the Solicitors of both parties, whereupon such further orders will be made as shall seem proper in the premises.

Dated at Greenville, Alabama, March 9th, 1917.



JUDGE.

NO. _____
IN THE CIRCUIT COURT OF
BALDWIN COUNTY.

SALIM KAHALLEY

VS.

SADIE KAHALLEY.

Order for reference to
ascertain suitable amount
for alimony and counsel
fees.

Filed 3/3-1917
J. W. Richardson
clerk

5
21
10
0

1204

Salim Kahaly

vs

Sadie Kahaly

Recorded in General Record
1 Page 6. v 10