

3514

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF

BAIDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. 3517

FINAL DECREE

This cause coming on to be heard was submitted upon Amended Bill of Complaint and answer thereto, Cross Bill of Complaint and Answer thereto, testimony ore tenus of the Complainant, Respondent and witnesses testifying for them and upon consideration thereof, the Court is of the opinion that the Complainant is not entitled to the relief prayed for in his amended Bill of Complaint; that the Cross Complainant is entitled to the relief prayed for in her Cross Bill of Complaint.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, by the Court, that the bonds of matrimony heretofore existing between the Complainant and Respondent be and the same are hereby dissolved, that the said Rezurt Bryant is forever divorced from the said Emmitt Bryant for and on account of adultery. The Cross Complainant Rezurt Bryant is hereby awarded the care, custody and control of her minor child, Shirley Ann Bryant. Emmitt Bryant the Complainant, is hereby given the right to visit said child at reasonable times and places. The Complainant, Emmitt Bryant, is hereby ordered to pay to Rezurt Bryant the sum of Thirty (\$30.00) Dollars per month for the support and maintenance of Shirley Ann Bryant; these payments to be made in two installments of Fifteen (\$15.00) Dollars each payable on the 1st and 15th day of each month.

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 Emmitt Bryant, the Complainant, pay the cost herein to be taxed for which execution may issue.

This 9th day of November, 1955.

Hubert M. Hall
Judge Circuit Court, in Equity.

WILLIAM BRYANT

COMPLAINANT

VS

WILLIAM BRYANT

RESPONDENT

FINAL DECREE

FILED

NOV 10 1953

ALICE J. DUCK, Clerk

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3514

ANSWER AND CROSS COMPLAINT

For answer to the Complainant's Complaint your Respondent says as follows:

1.

The Respondent admits the allegations contained in Sections 1 and 2 of the Bill of Complaint.

2.

The Respondent denies the allegations contained in Section 3 of the Bill of complaint and says that she did not voluntarily abandon the bed and board of the Complainant and that she has not remained away voluntarily and continuously since the 1st part of September, 1953. She further says that it is to the contrary that the Complainant voluntarily abandoned her on to-wit 15th day of September, 1953.

3.

The Respondent admits that part of the allegations contained in Section 4 of the Complaint which alleges that there were born out of the marriage between the Complainant and Respondent two children, one of which is married and the other being Shirley Ann Bryant, age less than 2 years. The Respondent denies that part of the said section which alleges that there is no property to be divided. The Respondent avers that at the time of the separation she and the Respondent lived together on a tract of land hereinafter to be described and that she continued to live on the said land until the 2nd child was born nearly six months after the Complainant abandoned her bed and board. She further says that the Complainant was and is now the owner of this land. The said land being more particularly described as follows:

From the Southeast corner of Section 24, Township 4 South, Range 2 East, run West 1736.3 feet and North 83 feet, more or less to a point on the North margin of U. S. Highway 31, thence continue North 627 feet; thence East 418 feet for a point of beginning, thence run East 418 feet, North $01^{\circ} 15'$ E. 304 feet, thence West 424.6 feet, thence South 304 feet to the point of beginning. Lot contains 3.14 acres, more or less, and lies in the South half of the Southeast quarter of Section 24, Township 4 South, Range 2 East.

Now having fully answered the Bill of Complaint the Respondent now, by way of Cross Bill, shows unto Your Honor as follows:

4.

That the Cross Complainant and Cross Respondent are over the age of twenty-one years, that the Cross Complainant is a resident citizen of Escambia County, Alabama, and has so resided for the past 14 months next preceding the filing of this Bill of Complaint. That the Cross Respondent is a resident citizen of Baldwin County, Alabama, and has so resided for more than one year next preceding the filing of this bill of complaint; that the Cross Complainant and Cross Respondent were married to one another at Monroeville, Alabama, on the 4th day of August, 1934, that they lived together as man and wife until to-wit, 15th day of September, 1953; at which time the said Cross Respondent did voluntarily abandon the bed and board of your Cross Complainant and has remained away voluntarily and continuously since that time.

5.

That there was born of the fruits of this marriage between the Cross Complainant and Cross Respondent two children, one of which is married, and the other Shirley Ann Bryant, age less than two years.

6.

That at the time the Cross Respondent voluntarily abandoned the bed and board of your Cross Complainant they were living on the following described lands:

From the Southeast corner of Section 24, Township 4 South, Range 2 East, run West 1736.3 feet and North 83 feet, more or less, to a point on the North margin of U. S. Highway 31, thence continue North 627 feet; thence East 418 feet for a point of beginning; thence run East 418 feet, North $01^{\circ} 15'$ E. 304 feet; thence West 424.6 feet, thence South 304 feet to the point of beginning. Lot contains 3.14 acres, more or less and lies in the South half of Southeast quarter of Section 24, Township 4 South, Range 2 East.

BOOK 017 PAGE 439

That your Cross Complainant lived on this land for six or seven months after the Cross Respondent abandoned her. That on March 17, 1954, the said Shirley Ann Bryant was born and that your Cross Complainant was then living on the above described land, and that she did continue to live there until to-wit, the 15th day of April, 1954, when her destitute condition required her to move to Escambia County, Alabama, with some of her relatives.

Your Cross Complainant further alleges that prior to the said separation the Cross Respondent was the owner in fee simple of the above described land and that he is now the owner in fee simple thereof.

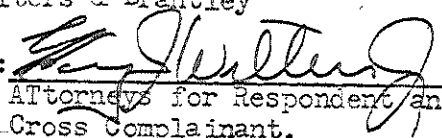
PRAYER FOR PROCESS

WHEREFORE, the premises considered, your Cross Complainant prays that Your Honor will by proper process make the said Emmitt Bryant, cross respondent to this Cross Bill of Complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

Premises considered, your Cross Complainant further prays that upon a hearing hereof, Your Honor will enter an order and decree granting her an absolute divorce from the Cross Respondent, forever barring the bonds of matrimony existing between her and the Cross Respondent; that a decree be made awarding to the Cross Complainant the custody, care and control of the minor child, Shirley Ann Bryant; your Cross Complainant prays for such other, further, different, and General relief as she may be in equity and good conscience entitled to receive.

Wilters & Brentley

BY: 
Attorneys for Respondent and
Cross Complainant.

RECORDED

3574

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

ANSWER AND CROSS COMPLAINT

FILED

JUN 8 1955

ALICE J. DUCK, Register

ALABAMA FOR RULE TO SHOW CAUSE

REARNT BRYANT

COMPLAINANT

VS

REARNT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. 3527

Comes your petitioner, Rearnt Bryant, who is over the age of 21 years and respectfully shows unto the court as follows:

1.

That on the 9th day of November, 1935 in the above entitled cause, a final decree was rendered divorcing your petitioner, the complainant, from Emmitt Bryant. That by this decree Emmitt Bryant was directed to pay your petitioner on the 1st and 15th day of each month the sum of \$15.

2.

That the said Emmitt Bryant has paid your petitioner only \$50 since the date of this decree. Although having sufficient means to comply with decree, he has willfully and contemptuously refused to obey said decree.

Premises considered your petition and prays that a rule be issued to the said Emmitt Bryant requiring him at a time and place to be therein stated, to appear before the court and show cause, if any he has, why he should not be punished for contempt.

Your petitioner prays for such, other, further, or different relief as may be meet and proper.

Rearnt Bryant
Rearnt Bryant

JUDGE OF ALABAMA

BALDWIN COUNTY

Before me

Lillian M. Brantley

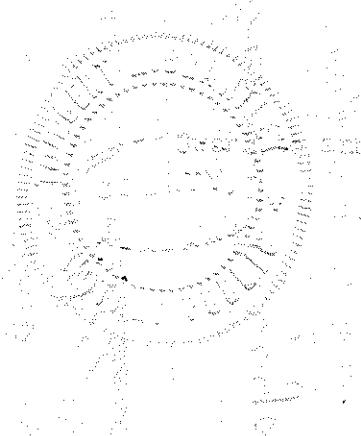
a Notary Public in and for said

County, personally appeared Rearnt Bryant, who is known to me, and who being by me first duly sworn, deposes and says: that she has knowledge of the facts stated in the above petition and that the same are true.

Rearnt Bryant
Rearnt Bryant

and subscribed before me this 2 day of July, 1936

Lillian M. Brantley
Notary Public, Baldwin County, Alabama



3517

Received 3 day of July 1956
and on 10 day of July 1956
I served a copy of the within Petition

Petition for rule to show cause

By service on Ernest Bryan

TAYLOR WILKINS, Sheriff
By W. H. Harn D. S.

Ernest S. Stapleton

Sheriff claims 32 miles at
Ten Cents per mile Total \$ 3.20
TAYLOR WILKINS, Sheriff
BY W. H. Harn
DEPUTY SHERIFF

IN THE CIRCUIT COURT OF BIRMINGHAM
COUNTY, ALABAMA, IN & CLERK

CASE NO. 3517 3514

FILED

JUL 3 1956

ALICE J. DUCK, Register

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
CASE NO. 3517

Rezurt Bryant having filed her verified petition praying that Emmitt Bryant be required to appear and show cause, if any he have, why he should not be punished as for a contempt in regard to the nature of the things set out in the verified petition; and upon consideration of said petition, it is,

Ordered, Adjudged and decreed, by the Court, that the said Emmitt Bryant appear before the court at 10 o'clock on the 11 day of August, 1956, in the court room of the Circuit Court of Baldwin County, at Bay Minette, Alabama, and show cause, if any he have, why he should not be punished as for a contempt. Let a copy of said petition and of this rule to show cause be served forthwith, personally, upon Emmitt Bryant, by the Sheriff of Baldwin County, Alabama.

Done this the 31 day of July, 1956.

Hubert M. Hall
JUDGE

110.3574

Received 31 day of July 1956
and on 1 day of Aug 1956
I served a copy of the within
on _____

By service on Emmitt Bryant

TAYLOR WILKINS, Sheriff

By J. D. Ham D. S.

to me S. Stapleton

Sheriff claims 34 miles at

Ten Cents per mile Total \$ 3.40

TAYLOR WILKINS, Sheriff

BY John
DEPUTY SHERIFF

Emmitt Bryant

Regent Bryant

Peter Malbis

ALICE J. DUCK, Register

EMMETT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

BOOK 017 PAGE 440

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3514

AMENDED ANSWER AND CROSS COMPLAINT

For answer to the Complainant's Complaint your Respondent says as follows:

1.

The Respondent admits the allegations contained in Sections 1 and 2 of the Bill of Complaint.

2.

The Respondent denies the allegations contained in Section 3 of the Bill of Complaint and says that she did not voluntarily abandon the bed and board of the Complainant and that she has not remained away voluntarily and continuously since the 1st part of September, 1953. She further says that it is to the contrary that the Complainant voluntarily abandoned her on to-wit, the 15th day of September, 1953.

3.

The Respondent admits that part of the allegations contained in Section 4 of the Complaint which alleges that there were born out of the marriage between the Complainant and Respondent, two children, one of which is married and the other being Shirley Ann Bryant, age less than 2 years. The Respondent denies that part of the said section which alleges that there is no property to be divided. The Respondent avers that at the time of the separation she and the Respondent lived together on a tract of land hereinafter to be described and that she continued to live on the said land until the second child was born nearly six months after the Complainant abandoned her bed and board. She further says that she and the Complainant were and are now the owners in fee simple of this land. The said land being more particularly described as follows:

From the Southeast corner of Section 24, Township 4 South, Range 2 East, run West 1736.3 feet and North 83 feet, more or less, to a point on the North margin of U. S. Highway 31, thence continue North 627 feet; thence East 418 feet, for a point of beginning, thence run East 418 feet, North $31^{\circ} 15'$ E. 304 feet, thence West 424.6 feet, thence South 304 feet to the point of beginning. Lot contains 3.14 acres, more or less, and lies in the South half of the Southeast quarter of Section 24, Township 4 South, Range 2 East, less one acre in the Northwest corner thereof.

Now having fully answered the Bill of Complaint, the Respondent now, by way of Cross Bill, shows unto Your Honor as follows:

4.

That the Cross Complainant and Cross Respondent are over the age of twenty-one years, that the Cross Complainant is a resident citizen of Escambia County, Alabama, and has so resided for the past 14 months next preceding the filing of this Bill of Complaint. That the Cross Respondent is a resident citizen of Baldwin County, Alabama, and has so resided for more than one year next preceding the filing of this bill of complaint; that the Cross Complainant and Cross Respondent were married to one another at Monroeville, Alabama, on the 4th day of August, 1934, that they lived together as man and wife until to-wit, 15th day of September, 1953; at which time the said Cross Respondent did voluntarily abandon the bed and board of your Cross Complainant and has remained away voluntarily and continuously since that time.

5.

That your Cross Complainant avers and alleges that since their marriage the Cross Respondent has been guilty of adultery with one Ann Sheppard, also known as Ann Bryant, whose name to your Cross Complainant is otherwise unknown and with divers parties and persons whose names to your Cross Complainant are unknown, which action of the Cross Respondent has not been condoned by your Cross Complainant. Further that on the 15th day of August, 1953, the Cross Respondent and the said Ann Sheppard entered into an unlawful marriage in Jackson County, Mississippi, the said Emmitt Bryant being then married to your Cross Complainant.

6.

That there was born of the fruits of this marriage between the Cross Complainant and Cross Respondent two children, one of which is married, and the other Shirley Ann Bryant, age less than two years.

7.

Further that the Cross Respondent owns an undivided one half interest in the following described lands in Baldwin County, Alabama, to-wit:

A. Beginning at the Northwest corner of the Northeast quarter of Southeast quarter of Section 24, Township 1 North, Range 1 East, run East 125 yards, South 140 yards, West 125 yards, North 140 yards, to the point of beginning, being Section 24, Township 1 North, Range 1 East. The conveyance of this land to the Cross Respondent is recorded in Deed Book 215-MS, page 336.

B. One acre in the Northwest corner of the following described lands in Baldwin County, Alabama, to-wit: From the Southeast corner of Section 24, Township 1 South, Range 2 East, run West 1736.3 feet and North 83 feet, more or less, to a point on the North margin of U. S. Highway 31, thence continue North 627 feet; thence East 418 feet, North 01° 15' E. 304 feet, thence West 424.6 feet, thence South 304 feet to the point of beginning. Lot contains 3.14 acres, more or less, and lies in the South half of the Southeast quarter of Section 24, Township 1 South, Range 2 East. This instrument is recorded in Deed Book 215, page 338.

8.

That the Cross Respondent is an ablebodied man that makes an income of approximately Twenty four hundred (\$2400.00) Dollars per year; that your Cross Complainant has no means of income except from her own labor.

9.

That it was necessary for your Cross Complainant to employ an attorney to bring this suit and that she has no separate estate to pay the attorney fees.

WHEREFORE, the premises considered, your Cross Complainant prays that your Honor will by proper process make the said Emmitt Bryant, Cross Respondent to the Cross Bill of Complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that Your Honor will order a reference to determine the reasonable amount to be paid by the Cross Respondent to the Cross Complainant as alimony pendente lite and for the support of the minor child, and also to determine a reasonable attorneys fee to be paid by the Cross Respondent to the Cross Complainant.

Your Cross Complainant further prays that upon a final hearing hereof Your Honor will enter a decree forever barring the bonds of matrimony between your Cross Complainant and Cross Respondent; that the Cross Complainant be awarded also a reasonable amount as may seem just and proper

as permanent alimony and for the support of the minor child, Shirley Ann Bryant; that your Cross Complainant be awarded the custody, care and control of the said child; that Your Honor will partition this property in kind in accordance with the equity each holds in the same; that if Your Honor finds it impossible to divide said property in kind, that Your Honor will cause the same to be sold under a decree for partition and division of the proceeds of the same.

Cross Complainant prays for all other, further and additional relief which in equity and good conscience she may be entitled to receive in the premises.

Wilters & Brantley

BY:

Clay J. Wilters
Solicitors for the Respondent
and Cross Complainant

3514

RECORDED

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

ATTENDED ANSWER AND
CROSS COMPLAINT

FILED

AUG 2 1955

AUDIE L. DECK, REGISTER

EMMITT BRYANT
COMPLAINANT
VS
REZURT BRYANT
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.
CASE NO. 3514

Comes the Complainant and Cross-Respondent in the above styled cause and amends his original complaint heretofore filed in said cause to read as follows:

EMMITT BRYANT
COMPLAINANT
VS
REZURT BRYANT
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
CASE NO. 3514

TO HONORABLE HUMBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Emmitt Bryant, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age; that the Respondent is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama.

2.

That your Complainant and the Respondent married at Moundsvill, Alabama, on the 4th Sunday in August, 1934, and lived together as husband and wife until the 1st part of September, 1953.

3.

That on to-wit; the first part of September, 1953, while your Complainant and Respondent were living together as husband and wife, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

There was born as fruits of this marriage between the Complainant and the Respondent two children, one of which is married, and the other being, Shirley Ann Bryant, age about two years.

5.

That your Complainant has by warranty deed conveyed to the Respondent and Cross-Complainant the original home and home-site occupied by the parties to this cause during coverture. Said conveyance being made as a property settlement in accordance with an agreement between the attorneys in this cause prior to the filing of the amended answer.

AND now your Complainant and Cross-Respondent shows further unto this Honorable Court in answer to the said cross bill filed by Rezurt Bryant, Respondent and Cross-Complainant herein.

6.

As to count five of said cross complaint your petitioner Emmitt Bryant shows unto this Honorable Court that prior to the 15th of August, 1953 the said Respondent in this cause stated to your petitioner that she had divorced him and relying upon her statement and believing same he did enter into a marriage with the said Ann Sheppard but upon being unable to obtain a copy of his divorce did retain C. LeVair Thompson an attorney to obtain for him a divorce and did immediately separate from the said Ann Sheppard until such a divorce could be obtained and during such period has not recognized the said Ann Sheppard as his wife.

7.

That the said Ann Sheppard did purchase those properties described in paragraph seven of the said amended cross complaint and paid all purchase monies for said land but did place your Respondent's name in the title thereto with the understanding that your petitioner would provide all monies for improvements on said properties which your petitioner has been unable to do up to this time and therefore your petitioner has no equity in said properties.

8.

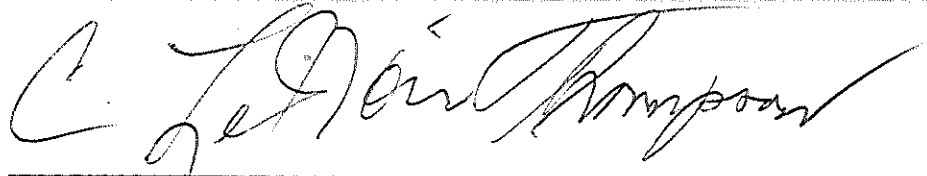
That your petitioner is irregularly employed, that during good weather your petitioner averages not less than four days a week in paper wood work being presently employed by Mr. W. M. McDill and that in bad weather your petitioner has no income whatever.

9.

That the said Rezurt Bryant has been living with a man named Dan and whose other name to your Petitioner otherwise unknown; during that the said cohabitation has taken place since the said Rezurt Bryant stated to your Petitioner she had divorced him.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said REZURE ERYANT, party Respondent to this bill of complaint requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that a decree be made awarding to the Respondent the custody, care and control of the minor child, Shirley Ann Bryant, age about two years; Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.



Solicitor for the Complainant.

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY
CASE NO. 3514

DEMURRERS

Comes now the Respondent in the above styled cause and demurs to the Complainant's Complaint and as grounds therefor shows unto Your Honor as follows:

1.

That there is no equity in the bill.

2.

That the Complainant fails to offer to do equity.

3.

That the Complaint fails to allege that the abandonment was without fault of the Complainant.

4.

The Complaint fails to allege that the Respondent has failed or refused to live with the Complainant since the alleged abandonment.

5.

That the Complaint is vague and indefinite as to the date of the alleged abandonment.

6.

The Complaint fails to allege that the Respondent abandoned the Complainant for more than one year next preceding the filing of the bill.

Wilters A. Brantley

BY: W. J. Wilters
Attorneys for the Respondent.

3574

RECORDED

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

DEMURRERS

FILED

MAY 31 1955

ALICE J. BOCK, Register

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons REZURT BRYANT, to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by EMMITT BRYANT as Complainant and against REZURT BRYANT, as Respondent.

WITNESS my hand this the 26 day of Apr, 1955.

Reisner
Register

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY.

TO HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Your Complainant, Emmitt Bryant, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age; that the Respondent is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama.

2.

That your Complainant and the Respondent married at Monroeville, Alabama, on the 4th Sunday in August, 1934, and lived together as husband and wife until the 1st part of September, 1955.

3.

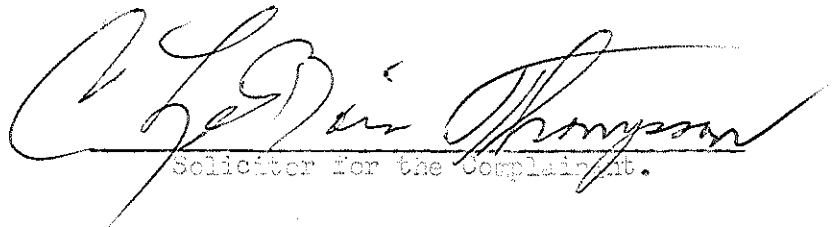
That on to-wit; the first part of September, 1955, while your Complainant and Respondent were living together as husband and wife, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

There was born as fruits of this marriage between the Complainant and the Respondent two children, one of which is married, and the other being, Shirley Ann Bryant, age less than two years, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said REZURT BRYANT, party Respondent to this bill of complaint requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that a decree be made awarding to the Respondent the custody, care and control of the minor child, Shirley Ann Bryant, age less than two years; Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.


Solicitor for the Complainant.

Respondent's present address is Freeraville, Escambia County, Alabama.

3574
RECORDED

Received 28 day of April 1955
and on 4 day of May 1955
served a copy of the within SEC

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

service on Rezurt Bryant
Atty. L. Emmons
TAYLOR WILKINS, Sheriff
By Alton J. Allen D. S.

SUMMONS AND COMPLAINT

FILED
APR 28 1955
ALICE J. DUCK, Register

From the law offices of
C. Lelloir Thompson
Attorney-at-Law
Bay Minette, Alabama

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. 3517

ANSWER TO COMPLAINANT'S AMENDED COMPLAINT.

Comes now the Respondent and Cross Complainant in the above styled cause and files this her answer to the Complainant's amended Bill of Complaint:

1.

The Respondent and Cross Complainant admits the allegations in Sections 1 and 2 and Section 4 thereof.

2.

The Respondent and Cross Complainant denies each and every other allegation contained therein and demands strict proof of the same.

Walters & Brantley

BY: Ray J. Walters
Solicitor for the Respondent
and Cross Complainant.

RECORDED

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

ANSWER TO COMPLAINANT'S

ALLEGATIONS OF CRIMINALITY

11/11/68
C-3
V-1
C-1

EMMITT BRYANT

COMPLAINANT

VS

REZURT BRYANT

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

CASE NO. 3517

ANSWER TO COMPLAINANT'S AMENDED COMPLAINT

Comes now the Respondent and Cross Complainant in the above styled cause and files this her answer to the Complainant's amended Bill of Complaint:

1.

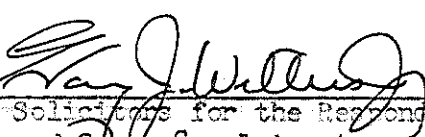
The Respondent and Cross Complainant admits the allegations in Sections 1 and 2 and Section 4 thereof.

2.

The Respondent and Cross Complainant denies each and every other allegation contained therein and demands strict proof of the same.

Wilters & Brantley

BY:


Solicitors for the Respondent
and Cross Complainant.