

3724

PETITION FOR RULE TO SHOW CAUSE

ARTINE LESLIE STIERS JR.	∅	IN THE CIRCUIT COURT OF
COMPLAINANT	∅	BALEWIN COUNTY, ALABAMA,
VS	∅	IN EQUITY
JEANNINE J. STIERS	∅	
RESPONDENT	∅	

Comes now your Petitioner, Jeannine J. Stiers and respectfully represents and shows unto Your Honor as follows:

1.

That on the 11th day of June, 1956, a final decree was rendered in the above entitled cause divorcing your petitioner from Artine Leslie Stiers, Jr., for and on account of cruelty; that by said decree the Complainant in this cause was given the care, custody and control of their minor children, Leslie Eugene Stiers and Roland Phillip Stiers. This said decree provides further: "Subject to the right of the Respondent, the mother of said children, to have custody of said children on every third week end, beginning at 4 o'clock on Friday afternoon and ending Sunday afternoon at 4 o'clock of each month in the year except July; that the Respondent shall have the custody of said children for the full month of July of each year."

Your Petitioner avers that since the time of the aforesaid decree Artine Leslie Stiers, Jr., has contemptuously and willfully disobeyed the aforesaid decree in this, he failed and refused to allow the Respondent and your Petitioner to have the custody of their children on the third week end of the month. On numerous occasions your Petitioner was obliged to get the assistance of the sheriff force in this county in order to force the Complainant to obey the orders of this court so far as it relates to her custody of the said minor children.

On almost every occasion that your petitioner has attempted to get her children at the times provided for in the aforesaid decree the Complainant has created a scene and made it embarrassing, humiliating and unpleasant and has on many occasions flatly refused to let her have custody of the children or see them.

WHEREFORE, premises considered, your Petitioner prays that a rule be issued to the said Artine Leslie Stiers, Jr., 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 for his willful and contemptuous failure to obey the orders of this court. Your Petitioner prays for such other, further or different relief as may be meet and proper.

Jeannine J. Stiers Nixon

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Sam J. Wilkins, Jr., a Notary Public, in and for said County and State personally appeared Jeannine J. Stiers, who is known to me, who being by me first duly sworn, deposes and says: That she has knowledge of the facts stated in the above petition; that the same are true.

Jeannine J. Stiers Nixon

Sworn to and subscribed before me this 11 day of February, 1959.

Sam J. Wilkins, Jr.  
Notary Public, Baldwin County, Alabama

ARTINE LESLIE STIERS JR.

COMPLAINANT

VS

JEANNINE J. STIERS

RESPONDENT

DEPUTY SHERIFF

BY

TAYLOR WILKINS, Sheriff

Ten Cents per mile Total \$

Sherriff claims miles at

6

DEPTITION FOR RULE TO SHOW CAUSE

FILED

JAN 5 1959

ALICE J. DUCK, Register

By service on

TAYLOR WILKINS, Sheriff

By W. G. [Signature]

3 miles south

of B.M.

I served a copy of the within

and on day of Jan 28 1959

Received day of Jan 28 1959

ARTIME LESLIE STIERS, JR.

COMPLAINANT

VS

JEANNINE J. STIERS

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

Comes now the Respondent and demurs to the bill of complaint and to each section and to each phrase thereof, separately and severally, and for grounds of demurrers therefor assign the following:

1.

There is no equity in the Bill.

2.

That the allegations of the bill are faulty in failing to show that the acts of adultery were committed after marriage.

3.

That the allegations of the bill fail to charge the Respondent with commission of adultery.

Walters & Brantley

BY:

*Ray J. Walters Jr.*  
Attorney for the Respondent

3724

ARTHUR IASLER STIERS, JR.

COMPLAINANT

VS

JERAMIAH J. STIERS

RESPONDENT

DELUERRERS

FILED

MAR 20 1956

ALICE J. DUCK, Register

*[Handwritten signature]*

PETITION FOR CHANGE OF CUSTODY

ARTINE LESLIE STIERS JR.	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALEWIN COUNTY, ALABAMA,
VS	)	IN EQUITY
JEANNINE J. STIERS	)	NO. 3724
RESPONDENT	)	

Comes now the Respondent in the above styled cause and shows unto Your Honor that she and the Respondent are each over the age of 21 years and both are resident citizens of Baldwin County, Alabama.

That on the 11th day of June, 1956, the Respondent obtained a divorce from the Complainant for and on account of cruelty. That in said decree the Complainant was given the care, custody and control of Leslie Eugene Stiers and Roland Phillip Stiers, the minor children of the Complainant and Respondent. The Respondent was given the custody of said children every third week end beginning at 4 o'clock on Friday afternoon and ending on Sunday afternoon at 4 o'clock except in the month of July and for this month the Respondent was given full custody.

The Respondent avers that since the time of the original divorce decree both the Complainant and Respondent have remarried; that the Respondent is now rearing a family by a second husband, that they have a good comfortable home and that she and her husband are fit and proper persons to have the complete care, custody and control of the aforesaid minor children.

The Respondent avers that on almost every time she goes after her children the Complainant fails and refuses to let her have them; that he is very disrespectful toward her, attempts to humiliate her and her family. That on numerous occasions she has had to ask the Sheriff force of Baldwin County, to assist her in enforcing the aforesaid divorce decree insofar as it pertains to the custody of her children; that this is a willful and contemptuous disregard to the Court's prior order.

WHEREFORE, premises considered, your Respondent prays that Your Honor will by proper process make the said Artine Leslie Stiers Jr., a party to this cause of action 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.

Your Respondent prays that Your Honor will give her the full care  
custody and control of Leslie Eugene Stiers and Roland Phillip Stiers;  
Your Respondent prays for such other, further or different relief to  
which she may in equity be entitled.

Wilters & Brantley

BY:

*Walter J. Wilters, Jr.*

~~Solicitors for the Respondent~~

3724

Received 28 day of Jan 1959  
on 28 day of Jan 1959  
received a copy of the within Petition  
Artine Leslie Stiers Jr

service on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Tolbert D. S.  
3 miles south  
of B.M.

Amount shown 6 miles at  
Tax Code per mile Total \$ 609  
TAYLOR WILKINS, Sheriff

BY \_\_\_\_\_  
DEPUTY SHERIFF

ARTINE LESLIE STIERS JR.  
COMPLAINANT

VS

JEANNINE J. STIERS  
RESPONDENT

PETITION FOR CHANGE OF CUSTODY

FILED  
JAN 5 1959

ALICE J. DUCK, ~~Clk~~ Register



LESLIE LESLIE STIERS, JR.

COMPLAINANT

VS

JENNIE J. STIERS

RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 3721

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 Section 1 of the Bill of Complaint.

2.

The Respondent admits that part of Section 2 which alleges she and the Complainant were married on August 25, 1951, and that they lived together as man and wife until February 5, 1956. The Respondent denies all other allegations contained in Section 2 of the Bill of Complaint.

3.

The Respondent admits that part of the allegations contained in Section 3 of the Bill of Complaint which says there was born to the Complainant and Respondent two children, their names and ages. The Respondent further admits that the Complainant has had the two minor children under his care, control and custody since February 5, 1956. For further answer the Respondent says that the Complainant on February 5, 1956, forced her to leave their home and that the Complainant took from her their two minor children and went to the home of the Complainant's parents and since that time the Complainant has refused to let your Respondent see, visit or communicate in any manner with her two children, and that she has on numerous occasions requested to do so. Your Respondent further says that the Complainant is not a fit and proper person to have the care, control and custody of the said two minor children, and that the home of the Complainant's mother is not a sufficient, proper or suitable home in which to raise children properly. Further that your Respondent is a fit and proper person to have the care, control and custody of the two minor children, Leslie Eugene Stiers and Ronald Phillip Stiers.

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 is 19 years of age and the Cross Respondent is 21 years of age; that both your Cross Complainant and Cross Respondent are residents of Baldwin County, Alabama, and have been for more than two years preceding the filing of the action.

5.

That your Cross Complainant and Cross Respondent were lawfully married to one another on to-wit, August 24, 1951.

6.

That there was born to their union the following named children; Leslie Eugene Stiers, age 3, and Ronald Phillip Stiers, age 2 years.

7.

That on, to-wit, February 5, 1956, and on many occasions prior and subsequent thereto the Cross Respondent threatened, abused and struck the Cross Complainant about her head and body and threatened to go further actual violence to her person which would necessarily endanger her life and health; that the conduct of the Cross Respondent was such as to give your Cross Complainant every reasonable apprehension to believe and she did believe that if she continued to live with the cross respondent he would do actual violence to her person which would necessarily endanger her life and health.

8.

That your Cross Complainant further represents unto Your Honor that she is a fit and proper person to have the care, control and custody of these two minor children; that she is residing in the home of her mother and father, Mr. and Mrs. Eugene Jackson of Bay Minette, and that this is a suitable and fit home in which a Christian atmosphere prevails.

9.

Your Cross Complainant further avers that the Cross Respondent is an abled bodied man and is presently earning a salary in excess of \$300.00 per month.

10.

Since the date of the Cross Complainant and Cross Respondent marriage they have purchased, through the joint efforts of both, the following household effects, appliances and equipment, to-wit:

- 1 Living room suite, (2 pieces, wine colored- club chair and sofa)
- 1 Bed room suite (4 pieces- bed, chest of drawers, dresser and vanity bench)
- 1 Antique dining room suite, (3 pieces; table, buffet, chest of drawers)
- 1 T.V. set (Silvertone combination radio, T.V. and record player, 27")
- 1 Coldspot Refrigerator
- 1 Electric Werge Stove
- 1 Bendix automatic washer
- 1 Dressing table
- 1 1953 red and white Buick.

11.

That the Cross Respondent ejected your Cross Complainant from his bed and board and that he kept in his possession and has failed to refused to return to her the following personal property, which is the property of your Cross Complainant and which was in her possession at the time she was ejected from the Cross Respondent's home:

- 1 rocking chair given to her by the Cross Respondent's grandmother.
- 1 box of pictures.

12.

That she has employed the firm of Wilters & Brantley, attorneys, to represent her in this matter of divorce and has no means of paying them for their services.

WHEREFORE, the premises considered, your Cross Complainant prays that Your Honor will by proper process make the said Artine Leslie Stiers, Jr., 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 the Honorable Court.

...Premises considered, Your Cross Complainant prays that on a final hearing of this cause, Your Honor will enter a decree granting your Cross Complainant a divorce from the Cross Respondent; Your Cross Complainant further prays that Your Honor will by said decree grant her the permanent care, control and custody of her minor children; Leslie Eugene Stiers and Ronald Phillip Stiers. Your Complainant further prays that Your Honor will order the Cross

Respondent to pay the Cross Complainant support money for their minor children and herself. Your Cross Complainant further prays that the Court will ascertain a reasonable attorneys fees to be paid the firm of Wilters and Brantley, Attorneys, for representing the Cross Complainant in this cause and cause the Cross Respondent to pay the same, together with the cost of this proceeding; your Cross Complainant further prays that Your Honor will divide the personal property described in this Complaint, between the Cross Complainant and the Cross Respondent according to the equities each own in the same. Your Cross Complainant prays for such other, further, or different relief to which your Cross Complainant may be in equity entitled.

Wilters & Brantley:

BY: Walter J. Wilters  
Attorneys for the Respondent  
and Cross Complainant.

ARTHEMUS ISIDORE STEERS, JR.

COMPLAINANT

VS

JEANETTE J. STEERS

RESPONDENT

ALLEGED ANNIHILATION CROSS BILL

ALICE A. DUCK, Registrar

1956

~~FILED~~

FILED

MAY 3<sup>rd</sup> 1956

ALICE A. DUCK, Registrar

020 MAY 1956

*Res Exh 1*

ARTINE LESLIE STIERS, JR.,  
Complainant,  
VS.  
JEANNINE J. STIERS,  
Respondent.

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

NO. 3724

This cause coming on to be heard is submitted for final decree upon the original bill of complaint, original and amended answer, and cross bill, and answer to amended cross bill and testimony of witnesses taken ore tenus. The Court, after considering all of the pleadings and the testimony of the witnesses, is of the opinion that the Complainant is not entitled to a divorce on the ground of adultery;

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the complaint, insofar as it seeks a divorce, is hereby denied.

The Court is of the opinion that the Complainant is a suitable, fit and proper person to have the custody of the minor children, Leslie Eugene Stiers and Ronald Phillip Stiers, and he is hereby charged with the responsibility of maintaining and supporting them, conditioned that he shall see that said children attend Sunday School while in his custody, subject to the right of the Respondent the mother of said children, to have the custody of said children on the third week end, beginning at 4:00 o'clock on Friday afternoon and ending Sunday afternoon at 4:00 o'clock, of each month in the year, except July; that the Respondent shall have the custody of said children for the full month of July of each year, conditioned that she shall see that said children attend Sunday School while in her custody.

IT IS THE FURTHER OPINION OF THE COURT that the Respondent and Cross Complainant is entitled to a divorce as prayed in her cross bill;

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony existing between the Complainant and the Respondent are forever dissolved and the Respondent and Cross Complainant is forever divorced from the Complainant and Cross Respondent.


IT IS FURTHER ORDERED that the prayer of the Respondent and Cross Complainant as to further relief be and it hereby is denied..

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 the Complainant and Respondent be, and they are hereby permitted to again contract marriage, upon payment of the cost of this suit.

IT IS FURTHER ORDERED THAT THE Complainant and Cross Respondent, Artine Leslie Stiers, Jr. pay the cost herein taxed, for which execution may issue.

This 11th day of June, 1956.

  
Judge, 28th Judicial Circuit of  
Alabama, sitting in Equity

FILED

JUN 11 1956

ALICE J. BUCK Register

ARTINE LESLIE STIERS, JR.

COMPLAINANT

VS

JEANNINE J. STIERS

RESPONDENT

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

RULE TO SHOW CAUSE

This cause being presented to the Court on the verified petition of Jeannine J. Stiers for rule nisi against Artine Leslie Stiers, Jr., on failure to obey divorce decree as directed by the Court, it is ordered that the Complainant, Artine Leslie Stiers, Jr., be and he is hereby commanded to be and appear before this court on the 19<sup>th</sup> day of February, 1959, at 10 o'clock A M. and show cause, if any he has, why the petition should not be granted and why he should not be adjudged in contempt of court.

It is further ordered that a copy of this petition and this order be served on the said Artine Leslie Stiers, Jr., by the Sheriff of Baldwin County, Alabama.

Done and ordered this the 26 day of January, 1959.

Hubert M. Howell  
Circuit Judge

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

You are hereby commanded to execute the foregoing and due return thereof made according to law.

This the 26 day of January, 1959.

Hubert M. Howell  
Circuit Judge



3724

ARTINE LESLIE STIERS, JR.

COMPLAINANT

VS

JEANNINE J. STIERS

RESPONDENT

RULE TO SHOW CAUSE

FILED

JAN 27 1959

ALICE J. DUCK, CLERK REGISTER

id. 28 day of Jan 1959  
28 day of Jan 1959  
d a copy of the within sub  
Artine Leslie Stiers Jr

vice on \_\_\_\_\_

TAYLOR WILKINS, Sheriff  
By W. A. Talbot S.  
3 miles south  
A B M.

Sheriff claims 6 miles at  
Ten Cents per mile Total \$ 6.00  
TAYLOR WILKINS, Sheriff  
BY \_\_\_\_\_  
DEPUTY SHERIFF

ARTINE LESLIE STIERS, JR.	↓	IN THE CIRCUIT COURT OF
COMPLAINANT	↓	BALDWIN COUNTY, ALABAMA,
VS	↓	IN EQUITY
JEANNINE J. STIERS	↓	NO. 3724
RESPONDENT	↓	

## ANSWER AND CROSS COMPLAINT

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

1.

The Respondent admits the allegations contained in Section 1 of the Bill of Complaint.

2.

The Respondent admits that part of Section 2 which alleges she and the Complainant were married on August 25, 1951, and that they lived together as man and wife until February 5, 1956. The Respondent denies all other allegations contained in Section 2 of the Bill of Complaint.

3.

The Respondent admits that part of the allegations contained in Section 3 of the Bill of Complaint which says there was born to the Complainant and Respondent two children, their names and ages. The Respondent further admits that the Complainant has had the two minor children under his care, control and custody since February 5, 1956. For further answer the Respondent says that the Complainant on February 5, 1956, forced her to leave their home and that the Complainant took from her their two minor children and went to the home of the Complainant's parents and since that time the Complainant has refused to let your Respondent see, visit or communicate in any manner with her two children and that she has on numerous occasions requested to do so. Your Respondent further says that the Complainant is not a fit and proper person to have the care, control and custody of the said two minor children, and that the home of the Complainant's mother is not a sufficient, proper or suitable home in which to raise children properly. Further that your Respondent is a fit and proper person to have the care, control and custody of the two minor children, Leslie Eugene Stiers and Ronald Phillip Stiers.

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 is 19 years of age and the Cross Respondent is 21 years of age; that both your Cross Complainant and Cross Respondent are residents of Baldwin County, Alabama, and have been for more than two years preceding the filing of the action.

5.

That your Cross Complainant and Cross Respondent were lawfully married to one another on to-wit, August 25, 1951.

6.

That there was born to their union the following named children; Leslie Eugene Stiers, age 3 and Ronald Phillip Stiers, age 2 years.

7.

That on to-wit, February 5, 1956, on many occasions prior and subsequent thereto the Cross Respondent threatened, abused and struck the Cross Complainant about her head and body and threatened to do further actual violence to her person which would necessarily endanger her life and health; that the conduct of the Cross Respondent was such as to give your Cross-Complainant every reasonable apprehension to believe and she did believe that if she continued to live with the cross respondent he would do actual violence to her person which would necessarily endanger her life and health.

8.

That your Complainant further represents unto Your Honor that she is a fit and proper person to have the care, control and custody of these two minor children; that she is residing in the home of her mother and father, Mr. and Mrs. Eugene Jackson of Bay Minette, and that this is a suitable and fit home in which a Christian atmosphere prevails.

9.

Your Complainant further avers that the respondent is an abled bodied man and is presently earning a salary in excess of \$300.00 per month.

10.

That she has employed the firm of Wilters & Brantley, Attorneys, to represent her in this matter of divorce and has no means of paying them for their services.

WHEREFORE, the premises considered, Your Cross Complainant prays that Your Honor will by proper process make the said Artine Leslie Stiers, Jr., 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 the Honorable Court.

Premises considered, Your Cross Complainant prays that on a final hearing of this cause, Your Honor will enter a decree granting your Cross Complainant a divorce from the Cross Respondent; Your Cross Complainant further prays that Your Honor will by said decree grant her the permanent care, control and custody of her minor children; Leslie Eugene Stiers and Donald Phillip Stiers. Your Complainant further prays that Your Honor will order the Cross Respondent to pay the Cross Complainant support money for their minor children and herself. Your Cross Complainant further prays that the Court will ascertain a reasonable attorneys fees to be paid the firm of Wilters and Brantley, Attorneys, for representing the Cross Complainant in this cause and cause the Cross Respondent to pay the same, together with the cost of this proceeding. Your Cross Complainant prays for such other, further or different relief to which your Cross Complainant may be in equity entitled.

Wilters & Brantley

BY:

*Henry J. Wilter, Jr.*  
Solicitor for the Respondent  
and Cross Complainant

ARTINE LESLIE STIERS, JR.

COMPLAINANT

VS

JEANNINE J. STIERS

RESPONDENT

EQUITY N° 3724

ANSWER & CROSS COMPLAINT

**FILED**  
APR 27 1956  
ALICE J. DUCK, Register

ARTINE LESLIE STEIRS  
 COMPLAINANT  
 VS  
 JEANNINE J. STEIRS  
 RESPONDENT

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

TO THE HONORABLE R. E. HALL, JUDGE OF SAID COURT:

Comes now your Petitioner Jeannine J. Steirs, the Respondent in the above styled cause and shows unto your Honor as follows:

1.

That the Complainant has filed a suit for divorce against her; that on February 5, 1956, the Complainant in this cause took their two minor children, Leslie Eugene Steirs age 2, and Ronald Phillips Steirs, age 1, and forced her to leave home. That the Complainant refused and has continued to refuse since said date to allow your Petitioner to visit with or have the said children visit with her.

2.

Your Petitioner further shows unto this Court that she is a fit and proper person to have the care, custody and control of these said minor children.

PRAYER FOR RELIEF

PREMISES CONSIDERED, your Petitioner prays that your Honor will forthwith issue an order granting her part time custody of these her children pending a final hearing in this matter.

Respectfully submitted,

Jeannine J. Steirs

STATE OF ALABAMA

BALDWIN COUNTY

Before me Harry J. Wilters Jr., this day personally appeared Jeannine J. Steirs, who being by me first duly sworn, deposes and says that she has read the foregoing petition and that the same is true and correct.

Jeannine J. Steirs

Sworn to and subscribed before me this 24 day of April, 1956.

Harry J. Wilters Jr.  
 Notary Public, Baldwin County, Alabama

Service is hereby accepted of a copy of the foregoing petition this the 30th day of April, 1956

CHASO E. STONE  
 By: Melborne P. Stone  
 Attorneys for Complainant

ARTINE LESLIE STEIRS

COMPLAINANT

VS

JEANNINE J. STEIRS

RESPONDENT

PETITION FOR PART TIME CUSTODY  
PENDING LITIGATION

FILED

APR 30 1956

ALICE J. BUCK, Clerk

302-0280

*Handwritten notes and signatures:*

10/13/56

*[Signature]*

*waiting proposal sent to ppa & to be given placed in court*

*10/13/56 to job done with not*

*2002 & 2001*


ARTINE LESLIE STIERS, JR.,            |            IN THE CIRCUIT COURT OF  
  |            BALDWIN COUNTY, ALABAMA  
  |            IN EQUITY  
vs.                                        |            NO. 3724  
JEANNINE J. STIERS,                   |  
  |            Respondent.

Comes now the Complainant in the above styled cause and for answer to the petition filed in this cause by the Respondent for temporary custody of the two children born to the Complainant and the Respondent, says as follows:

1. The Complainant admits the allegations of Paragraph "1." of said petition.
2. The Complainant denies the allegations of Paragraph "2." of said petition.

Respectfully submitted,

CHASON & STONE

By: 



ARTINE LESLIE STIERS, JR.,	Ø	
Complainant,	Ø	IN THE CIRCUIT COURT OF
vs.	Ø	BALDWIN COUNTY, ALABAMA
JEANNINE J. STIERS,	Ø	IN EQUITY
Respondent.	Ø	NO. 3724

DEMURRER AND ANSWER TO THE AMENDED CROSS-BILL

Comes now the Complainant in the above styled cause, by his Solicitors, and demurrs to the amended cross-bill filed in this cause by the Respondent and assigns the following separate and several grounds in support thereof:

1. There is no equity in the cross-bill.

2. That the allegations of the cross-bill fail to state a ground for divorce under the laws of the State of Alabama.

Without waiving the foregoing demurrer but expressly insisting thereon, comes now the Complainant and Cross-Respondent and for answer to the cross-bill heretofore filed against him says as follows:

1. The Cross-Respondent admits the allegations of paragraph "4" of the amended cross-bill.

2. The Cross-Respondent admits the allegations of paragraph "5" of the amended cross-bill.

3. The Cross-Respondent admits the allegations of paragraph "6" of the amended cross-bill.

4. The Cross-Respondent denies the allegations of paragraph "7" of the amended cross-bill.

5. The Cross-Respondent denies the allegations of paragraph "8" of the amended cross-bill except wherein it is alleged that the home of Mr. And Mrs. Eugene Jackson is a suitable and fit home. For further answer to paragraph "8" of the amended cross-bill the Cross-Respondent alleges that the Cross-Complainant is not a fit and proper person to have the care, custody and control of her minor children regardless of the home in which she is now residing or will reside in the future and that it would not be to the best interest of said minor children for them to be in anywise subject to the influence, dominion or control of the Cross-Complainant.

6. The Cross-Respondent admits the allegations of paragraph "9" of the amended cross-bill.


7. The Cross-Respondent denies the allegations of paragraph "10" of the amended cross-bill.

8. The Cross-Respondent denies the allegations of paragraph "11" of the amended cross-bill.

9. The Cross-Respondent denies the allegations of paragraph "12" of the amended cross-bill.

Respectfully submitted,

CHASON & STONE

By:   
Solicitor for Complainant and Cross-Respondent

ARTINE LESLIE STIERS, JR.,  
Complainant,

VS.

JEANETTE J. STIERS,  
Respondent.

IN THE  
CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA.

IN EQUITY  
NO. 3724

This cause coming on to be heard is submitted upon demurrer of the Respondent to the original bill of complaint of the complainant, and the Court, after considering the same, is of the opinion that the demurrer is not well taken and should be overruled;

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the demurrer filed on behalf of the Respondent to the original bill of complaint on behalf of the Complainant be, and the same is hereby overruled.

IT IS FURTHER ORDERED that the Respondent be, and she is hereby allowed 20 days in which to file additional pleading.

This 17th day of April, 1956.

*J. Hubert McMill*  
-----  
Judge, 28th Judicial Circuit

FILED

APR 18 1956

ALICE I. DUCK, Register

STATE OF ALABAMA )  
 )  
 BALDWIN COUNTY )

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jeannine J. Stiers to 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 Artine Leslie Stiers, Jr., as Complainant, against Jeannine J. Stiers, as Respondent.

Witness my hand this 18 day of February, 1956.

*Artine Leslie Stiers, Jr.*  
 \_\_\_\_\_  
 Register.

ARTINE LESLIE STIERS, JR.,

Complainant,

vs.

JEANNINE J. STIERS,

Respondent.

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↓  
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↓  
↓

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 IN EQUITY

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

Comes your Complainant, Artine Leslie Stiers, Jr., and files this his Bill of Complaint for divorce against Jeannine J. Stiers, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant is over the age of twenty-one years and a resident citizen of Bay Minette, Baldwin County, Alabama; that the Respondent is 19 years of age and a resident citizen of Bay Minette, Baldwin County, Alabama; that both your Complainant and the Respondent have resided in Baldwin County for more than two years next preceding the filing of this Bill of Complaint.

SECOND:

That your Complainant and the Respondent were married on to-wit: August 25, 1951, and lived together as man and wife until, on account of the matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate and apart

from her. That the Respondent has committed adultery with one or more persons whose names are unknown to the Complainant during the period of approximately the last six months, and without the knowledge of your Complainant, but that he did discover her in the company of one Thomas Criswell on February 5, 1956, and on said date, and immediately thereafter, discovered evidence of such adultery and that he has not lived with her since that time.

THIRD:

That there were born to your Complainant and the Respondent two children, Leslie Eugene Stiers, two years old, and Ronald Phillip Stiers, one year old, and that your Complainant now has the complete care, custody and control of such children, and has had since February 5, 1956. That your Complainant is a fit and proper person to have the care, custody and control of said minor children, and that they are now living with the mother of your Complainant in Bay Minette, Alabama, who is providing for said children a proper home and complete and sufficient care. That the Respondent is not a fit and proper person to have the care, custody and control of said minor children.


PRAYER FOR PROCESS

The premises considered, your Complainant prays that this Honorable Court will cause the usual writ of process to be issued and that the Respondent be made a party of this proceeding and required to answer the same within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

The premises considered, your Complainant further prays that upon a final hearing of this cause that this Honorable Court will grant to your Complainant an absolute divorce from the said Respondent for and on account of adultery, and that in and by the terms of said decree, that your Complainant will be awarded the complete custody and control of the aforesaid minor children. And your Complainant prays for such other, further and different relief as in the premises will be meet and proper.

CHASON & STONE

By:   
Attorneys for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, *John D. Gibson*, a Notary Public, in and for said State and County, personally appeared Artine Leslie Stiers, Jr., who is known to me and who, after being first by me duly and legally sworn, did depose and say under oath as follows:

That the allegations contained in the foregoing Bill of Complaint are true.

*Artine Leslie Stiers, Jr.*  
Artine Leslie Stiers, Jr.

Sworn to and subscribed before me this 15<sup>th</sup> day of February, 1956.

*John D. Gibson*  
Notary Public, Baldwin County, Ala.