

AGNES PAULINE HALL COMPLAINANT	) IN THE CIRCUIT COURT OF
	BALDWIN COUNTY, ALABAMA
VS.	) IN EQUITY
JOHN LESLIE HALL, SR. RESPONDENT	

The matter of the tempozary care, control and custody of JOHN LESLIE HALL, JR. and KENNITH EARL HALL, minor children of the complainant and respondent, having been presented to the Court and submitted to the jurisdiction of the Court by the Complainant and Respondent and their respective attorneys', all being present in open Court with the said minor Children, for an order; and upon consideration of the said submission to the Court for an order and consideration of the oral agreements made by the parties hereto in the presence of the Court and the parties' attorneys, it is hereby,

ORDERED, ADJUDGED and DECREED by the COURT that the oral agreement made by the parties in the presence of the Court be and it is herebyb ratified and the care, custody and control of the minor children of the marriage, namely JOHN LESLIE HALL, JR. and KENNITH EARL HALL is awarded to the mother and complainant, AGNES PAULINE HALL with the right of JOHN LESLIE HALL, SR. to visit said children at reasonable times and places, all pending the hearing on the suit. All other matters are held for further orders and decrees of this Court.

DONE and ORDERED this the 8th day of August, 1956.

JUDGE OF THE CIRCUIT COURT

Decree

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AUG 20 1956

MCE L' DUCK, Register

AGNES PAULINE HALL ) COMPLAINANT )	IN THE CIRCUIT COURT OF
vs )	BALDWIN COUNTY, ALABAMA,
JOHN LESLIE HALL, SR. )	IN EQUITY

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

Now comes the Complainant, and with permission of the Court first had had and obtained, amends her bill of complaint, heretofore filed by adding the following:

Paragraph 3: your complainant further alleges and avers that said respondent did on or about to-wit: 30th day of June, 1956 and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has comitted actual violence on her person attended with danger to her health and life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with with danger to her life or health.

and ammending the prayer as follows:

The premises considered, your complainant prays that your Honor will order service to be had according to law upon said respondent, commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law and that your Honor will hold a hearing and award the Complainant temporary care, control and custody of the said minor children, pending this suit, and that your Honor will order the Register of this Court to hold asreference and report to this court what would be a reasonable amount to be allowed your complainant as alamony for her support and maintenance and the support and maintenance of the said minor children, pending this suit, and what would be a reasonable amount to be allowed your complainant's solicitor for his services rendered and to be rendered in this suit, and that upon a final hearing of this cause, that your Honor will render a decree divorcing your complainant from the respondent, granting the complainant permanent care, control and custody of the said minor children, permanent alimony for her support and maintenance and support and maintenance for said minor children, and your complainant prays for such other, further or general relief to which she may be entitled.

SOLICITOR FOR COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AGNES PAULINE HALL COMPLAINANT

VS.

JOHN LESLIE HALL RESPONDENT

AMENDMENT TO BILL OF COMPLAINT

FILED

AUG. 10 1956

AUG. A. DUGK. Begister

ARTHUR C. EPPERSON ATTORNEY AT LAW FOLEY, ALA.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

This day came Agnes Fauline Hall and filed her verified petition praying that JOHN LESLIE HALL, SR., be required to appear and to show cause, if any he have, why he should not be punished as for contempt in regard to the nature of things set out in the verified petition; and upon consideration of the said petition, it is

ORDERED, ADJUDGED and DECREED by the Court that the P. M. said JOHN LESLIE MALL, SR., appear before the Court at \_\_\_\_\_ A. M. on the \_\_\_\_\_ day of September, 1956, in the Court room fo the Circuit Court of Baldwin County, Alabama, and show cause, if any he have why he should not be punished as for contempt.

Late copy of said petition and of this rule to show

Let a copy of sold petition and of this rule to show cause be served forewith, personally upon the said John Leslie Mail, Sr. by the Sheriff of Baldwin County, Ala.

Done this 18th day of September, 1956.

Judge of the Circuit Court.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE HUBERT M. HALL, Judge of the Circuit Court, Baldwin County, Alabama, Sitting in Equity:

Now comes the complainant and respectfully shows to the Court that by order of this Court made and entered on August 8, 1956, your complainant was awarded the care, control and custody of the minor children of the marriage, namely JOHN LESLIE HALL, JR. AND KENNITH EARL HALL, with the right of John Leslie Hall, Sr., to visit said children at reasonable times and places, pending a hearing on this suit; that said respondent, John Leslie Hall, Sr., has wilfully and defiantly disobeyed the order of the Court, in that he has forcefully and against the entreaties of the complainant, taken the child John Leslie Hall Jr., from the care, control and custody of you complainant and after having kept said child away from your complainant for more than eight days still refuses to return said child to your complainant.

Wherefore your complainant respectfully prays that the Court make and enter an order requiring the respondent to show cause if any he has why he should not be adjudged guilty of contempt of this Court for failure to obey and respect the order of this Court awarding the care, control and custody of said minor child to the complainant. Your Complainant further prays that the Court will hold a hearing and award a definite sum of money for temporary support and maintenance of said minor children and temporary attorney fees for the complainant and such other and further relief as may be mete and proper.

agaes Bulene Hall

STATE OF ALABAMA BALDWIN COUNTY

Before me, Arthur C. Epperson, XXXXXXXXX a Notary Public, in and for the State of Alabama, at large, personally

appeared Agnes Pauline Hall, who is known to me and who first being duly sworn, deposes and says that she has knowledge of the facts of the above petition as stated, and that the same are true.

agass Buling Hall

Sworn to and subscribed before me this the 17th day of September, 1956.

Arthur C. Eppfe from, Notary Public State of Alabama, at large.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE HUBERT M. HALL, Judge of the Circuit Court, Baldwin County, Alabama, Sitting in Equity:

Now comes the complainant and respectfully shows to the Court that by order of this Court made and entered on August 8, 1956, your complainant was awarded the care, control and custody of the minor children of the marriage, namely JOHN LESLIE HALL, JR. AND KENNITH EARL HALL, with the right of John Leslie Hall, Sr., to visit said children at reasonable times and places, pending a hearing on this suit; that said respondent, John Leslie Hall, Sr., has wilfully and defiantly disobeyed the order of the Court, in that he has forcefully and against the entreaties of the complainant, taken the child John Leslie Hall Jr., from the care, control and custody of you complainant and after having kept said child away from your complainant for more than eight days still refuses to return said child to your complainant.

Wherefore your complainant respectfully prays that the Court make and enter an order requiring the respondent to show cause if any he has why he should not be adjudged guilty of contempt of this Court for failure to chey and respect the order of this Court awarding the care, control and custody of said minor child to the complainant. Your Complainant further prays that the Court will hold a hearing and award a definite sum of money for temporary support and maintenance of said minor children and temporary attorney fees for the complainant and such other and further relief as may be mete and proper.

again Buline Hell

STATE OF ALABAMA BALDWIN COUNTY

Before me, Arthur C. Epperson, AXXXXXXXXX a Notary Public, in and for the State of Alabama, at large, personally

appeared Agnes Pauline Hall, who is known to me and who first being duly sworn, deposes and says that she has knowledge of the facts of the above petition as stated, and that the same are true.

agaes Bules Hall

Swprn to and subscribed before me this the 17th day

of September, 1956.

Arthur C. Eppfreon, Notary Public State of Alabama, at large.

SEP 18 1956

ANICE A: DUCK, Register

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

This day came Agnes Pauline Hall and filed her verified petition praying that JOHN LESLIE HALL, SR., be required to appear and to show cause, if any he have, why he should not be punished as for comtempt in regard to the nature of things set out in the verified petition; and upon consideration of the said petition, it is

ORDERED, ADJUDGED and DECREED by the Court that the said JOHN LESLIE HALL, SR., appear before the Court at 7:30 A. M. on the day of September, 1956, in the Court room fo the Circuit Court of Baldwin County, Alabama, and show cause, if any he have why he should not be punished as for contempt.

LEt a copy of said petition and of this rule to show cause be served forewith, personally upon the said John Leslie Hall, Sr. by the Sheriff of Baldwin County, Ala.

Bone this 18th day of September, 1956.

SEP 18 1856
ALICE H. DUCK, RESISTAN

Judge of the Circuit Court.

AGNES PAULINE HALL	1	
COMPLAINANT	3	IN THE CIRCUIT COURT OF
	1	
VS.	1	BALDWIN COUNTY, ALABAMA
	)	,
JOHN LESLIE HALL	•	IN FOUITY
RESPONDENT	)	<u></u>

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

Your complainant Agnes Pauline Hall, respectfully represents and shows unto your Honor:

- l. That the complainant is over the age of twenty years and is a resident of said State and County, and has been a bona fide resident for more than one year next preceding the filing of this bill of complaint; that John Leslie Hall is over the age of twenty-one years and resides in Baldwin County, Alabama.
- 2. That your complainant and respondent were lawfully married on or about, to-wit: April 30, 1950, in Gulfport, Mississippi, and of this marriage there are two minor children, John Teslie Hall, Jr. born November 13, 1953, and Kenneth Earl Hall, born August 20, 1955, dependant upon the respondent.
- 3. Your complainant further avers and alleges that the said respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.
- 4. Complainant avers that said respondent is employed and making \$75.00 to \$80.00 a week; that the complainant owns no property and has no means of support for herself and minor children; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor children; your complainant further avers that she is without means to pay her solicitor of record for his services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Honor will order service to be had according to law upon said respondent, commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law and that your Honor will order the Register of this Court to hold a reference and report to this court what would be a reasonable amount to be allowed your complainant as alimony for her support and maintenance and the support and maintenance of the said minor children, pending this suit, and what would be a reasonable amount to be allowed your complainant's solicitor for his services rendered and to be rendered in this suit, and that upon a final hearing of this cause, that your Honor will render a decree divorcing your complainant from the respondent, granting the complainant permanent care, control and custody of the said monor children, permanent alimony for her support and maintenance and support and maintenance for said minor children, and your complainant prays for such other, further or general relief to which she may be entitled.

SOLICITOR FOR COMPLAINANT

RESPONDENT'S ADDRESS:

Route Box 67 Fairhope, Alabama

m.3837

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AGNES PAULINE HALL COMPLAINANT

VS

JOHN LESLIE HALL RESPONDENT

BILL OF COMPLAINT

AUG 2 1956

ALICE J. DUCK, Register ARTHUR C. EPPERSON ATTORNEY AT LAW FOLEY, ALA.

\_\_\_\_TERM, 19\_56

Plaintiff\_\_\_\_

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		BALDWI					Ì

2nd.

Witness my hand this -

CIRCUIT COURT, BALDWIN COUNTY No. 3837

August

TO ANY SHER	IFF OF THE STATE OF	ALABAMA:	
Tarification of the state of th	•		:
You Are Hereby	Commanded to Summon	JCHN LESLIE HALL	
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and the second s	And the second s		
to appear and ple	ead, answer or demur, within	thirty days from the service hereof, to t	he complaint filed in
the Circuit Court	of Baldwin County, State of	Alabama, at Bay Minette, against	
	JOHN LESLIE HALI		, Defendant
	AGNES PART THE WALL		- - - 
by	PAULINE HALL	·	

3837 Page		
THE STATE OF ALA BALDWIN COUNTY	BAMA	Defendant lives at
CIRCUIT COUR	RT	RECEIVED IN OFFICE
Management of the Control of the Con		8/2,19.56
AGNES PAULINE HALL	:	
÷ .		I have executed this summons
vs.	Plaintiffs	this 15. Aug ,1954
JOHN LESLIE HALL	:	
D	efendants	Jahn Leslie Hole
SUMMONS and COMP	LAINT	,
AUGUST 2	,19 <u>56</u>	Sheriff claims 22 miles at  Ten Cents per mile Total \$  Ten Cents per mile Total \$
Alice J. Duck		Thadham
***************************************	, Clerk	BY DEPUTY SHERIFF
ARTHUR EPPERSON Plaintiff's	Attorney	1.1.1.1.1.1.
A THE RESERVE TO THE		Taylor Wilhingsheriff
Defendant's	Attorney	Lollerigh Stead Beporty Sheriff
		Tairhope, ala.

BALDWIN COUNTY

## RY PARTE KENWETH RARL HALL

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

The petitioner Agnes Pauline Hell, who is over the age of twenty years and who is a resident of Baldwin County, Alabama, who would respectfully show and represent unto your Honor:

- l. That she is the nother of Kenneth Barl Hell, who is a minor of less than one year of age; that John Laslie Hell is the father of the said minor kenneth Marl Hell.
- 2. That your petitioner left the said John Leslie Hall with just cause and has entered suit for a divorce against the said John Leslie Hall; that since leaving the said John Leslie Hall the petitioner has had the care and custody of the said minor child Kenneth Barl Hall.
- 3. Petitioner further evers that the said John Leslie Hall took the child Kenneth Barl Hall from his mother and the petitioner by force and refuses to return the child to his mother and that the said John Leslie Hall is not a fit person to have the care and custody of the said minor child.

The petitioner prays that a writ of habeas corpus be issued, directed to the seid Wohn Lealie Hall, commanding him to bring Kenneth Earl Hell before your Honor at the time and place to be appointed together with the cause for his unlawfully holding said child.

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STATE OF ALABAMA

BALDWIN COUNTY

Before me Arthur C. Epperson, a Notary Public in and for the State of Alebana, at large, personally appeared Agnes Pauline Hall, the above named petitioner, who being first by me duly sworm doth depose and say that the facts stated in said petition are true.

and the state of t

Sworn to and subscribed before me this 6th day of August, 1956.

Motary Public St. Andbana of Large My commission expires Mercia 8, 1959

AUG 6 1956

AMOS J. DUCK Register

STATE OF ALABAMA

CIRCUIT COURT

BALDWIN COUNTY

TO JOHN LESLIE HALL OF FAIRHOPE, ALABAMA:

You are hereby commanded to have the body of Kenneth Harl Hall, alleged to be detained by you, by whatsoever name the said Kenneth Harl Hall is called or charged, with the cause of such detention, before me Hubert M. Hall, Judge of the Circuit Court of Baldwin County, Alabama, on the \_\_\_\_ day of August, 1956, at the Court House at Bay Minette, Alabama, at to do and receive what shall then and there be considered concerning the said Kenneth Harl Hall.

Dated this the 6th day of August, 1956.

Circuit Judge

STAT E OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALARAMA:

You are hereby commanded to serve a copy of the above and foregoing writ on John Lealie Hall, by delivering a copy of said writ to him, and by showing the original if demanded.

Witness my hand this, the 6th day of August, 1956.

Circuit Clark

ALICE J. DUCK, Register

BALDWIN COUNTY

TO JOHN LESLIE HALL OF FAIRHOPE, ALABAMA:

You are hereby commanded to have the body of Kenneth Earl Hall, alleged to be detained by you, by whatsoever name the said Kenneth Earl Hall is called or charged, with the cause of such detention, before me Hubert M. Hall, Judge of the Circuit Court of Baldwin County, Alabama, on the gray day of August, 1956, at the Court House at Bay Minette, Alabama, at Gray to do and receive what shall then and there be considered concerning the said Kenneth Earl Hall.

Dated this the 6th day of August, 1956.

Circuit Judge

STAT E OF ALABAMA

AUG 6 1956

ALICE J. DUCK ROYALL

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to serve a copy of the above and foregoing writ on John Leslie Hall, by delivering a copy of said writ to him, and by showing the original if demanded.

Witness my hand this, the 6th day of August, 1956.

Circuit Clerk

Executed. 8-11-56 3837/2 By Samuely a Copy Expurte John Leslie Hall Vinneth Earl Hall Fairhope, ala. (Rings Skereff Taylor Welberra Elleugh Deadha frail Kogro on left Ten Cents per mile Total \$ 2 TAYLOR WILKINS, Sheriff 9. P.M. BY DEPOTY LALL. a Epperson

STATE OF ALABAMA

BALDWIN COUNTY

## EX PARTE KENNETH EARL HALL

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

The petitioner Agnes Pauline Hall, who is over the age of twenty years and who is a resident of Baldwin County, Alabama, who would respectfully show and represent unto your Honor:

- 1. That she is the mother of Kenneth Earl Hall, who is a minor of less than one year of age; that John Leslie Hall is the father of the said minor kenneth Earl Hall.
- 2. That your petitioner left the said John Leslie Hall with just cause and has entered suit for a divorce against the said John Leslie Hall; that since leaving the said John Leslie Hall the petitioner has had the care and custody of the said minor child Kenneth Earl Hall.
- 3. Petitioner further avers that the said John Leslie Hall took the child Kenneth Earl Hall from his mother and the petitioner by force and refuses to return the child to his mother and that the said John Leslie Hall is not a fit person to have the care and custody of the said minor child.

The petitioner prays that a writ of habeas corpus be issued, directed to the said Mohn Leslie Hall, commanding him to bring Kenneth Earl Hall before your Honor at the time and place to be appointed together with the cause for his unlawfully holding said child.

agnes Ruline Hall

STATE OF ALABAMA

BALDWIN COUNTY

Before me Arthur C. Epperson, a Notary Public in and for the State of Alabama, at large, personally appeared Agnes Pauline Hall, the above named petitioner, who being first by me duly sworn doth depose and say that the facts stated in said petition are true.

Rapes Parling Hall
Petitioner

Sworn to and subscribed before me this 6th day of August, 1956.

Notery Public Commission expires Morch 8, 1959.

FILED AUG 6 1956

ALICE J. DUCK. Register

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE HUBERT M. HALL, Judge of the Circuit Court, Baldwin County, Alabama, Sitting in Equity:

Now comes the complainant and respectfully shows to the Court that by order of this Court made and entered on August 8, 1956, your complainant was awarded the care, control and custody of the minor children of the marriage, namely JOHN LESLIE HALL, JR. AND KENNITH EARL HALL, with the right of John Leslie Hall, Sr., to visit said children at reasonable times and places, pending a hearing on this suit; that said respondent, John Leslie Hall, Sr., has wilfully and defiantly disobeyed the order of the Court, in that he has forcefully and against the entreaties of the complainant, taken the child John Leslie Hall Jr., from the care, control and custody of you complainant and after having kept said child away from your complainant for more than eight days still refuses to return said child to your complainant.

Wherefore your complainant respectfully prays that the Court make and enter an order requiring the respondent to show cause if any he has why he should not be adjudged guilty of contempt of this Court for failure to obey and respect the order of this Court awarding the care, control and custody of said minor child to the complainant. Your Complainant further prays that the Court will hold a hearing and award a definite sum of money for temporary support and maintenance of said minor children and temporary attorney fees for the complainant and such other and further relief as may be mete and proper.

agnes Perline Hall

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Arthur C. Epperson, AXXXXXXXXX a Notary Public, in and for the State of Alabama, at large, personally

appeared Agnes Pauline Hall, who is known to me and who first being duly sworn, deposes and says that she has knowledge of the facts of the above petition as stated, and that the same are true.

agnes Bulino Hall

Swprn to and subscribed before me this the 17th day of September, 1956.

Arthur C. Epperson, Notary Public State of Alabama, at large.

SEP 18 1956 ALICE & DUCK Register

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

This day came Agnes Pauline Hall and filed her verified petition praying that JOHN LESLIE HALL, SR., be required to appear and to show cause, if any he have, why he should not be punished as for comtempt in regard to the nature of things set out in the verified petition; and upon consideration of the said petition, it is

ORDERED, ADJUDGED and DECREED by the Court that the said JOHN LESLIE HALL, SR., appear before the Court at 9:20 A. M. on the 2 day of September, 1956, in the Court room fo the Circuit Court of Baldwin County, Alabama, and show cause, if any he have why he should not be punished as for contempt.

 $\mathsf{L}^\mathsf{E}\mathsf{t}$  a copy of said petition and of this rule to show cause be served forewith, personally upon the said John Leslie Hall, Sr. by the Sheriff of Baldwin County, Ala.

Done this 18th day of September, 1956.

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Judge of the Circuit Court.

FILED
SEP 18 1956
ALICE J. DUCK, Register

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By

John Lereie Hull

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gyggggadadananaka disambinanaka manganan mangkat ministra	TAYLOR WILKINS, Sheriff
	ByD. :

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