

3984

NAOMI HARPER
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

IN EQUITY

BENJAMIN FRANKLIN HARPER
RESPONDENT

CASE NO. 3948

In this cause it is made to appear to the Court, by the affidavit of Arthur C. Epperson, that BENJAMIN FRANKLIN HARPER is a nonresident of the State of Alabama; and further, that in the belief of said affiant, said respondent is over the age of twenty-one years.

It is therefore ordered by the Court that publication be made in the ONLOOKER, a newspaper published in Baldwin County, State of Alabama, for four consecutive weeks, requiring the said BENJAMIN FRANKLIN HARPER to appear and plead to answer or demur to the bill of complaint in said cause by the 18th day of April, 1957 or in thirty days thereafter a decree pro confesso may be rendered against BENJAMIN FRANKLIN HARPER.

Witness my hand this 27th day of March, 1957.

Register,
Circuit Court.

Arthur C. Epperson
Attorney for the Complainant
Foley, Alabama

NAOMI HARPER
COMPLAINANT

VS.

BENJAMIN FRANKLIN HARPER
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

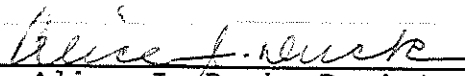
CASE NO. 3948

Personally appeared before me Arthur C. Epperson, Attorney of Record for complainant in the above styled cause, who being duly sworn, deposes and says that he is informed and verily believes that BENJAMIN FRANKLIN HARPER, the respondent in the above styled cause, is a nonresident of Baldwin County, Alabama, or conceals himself so that process can not be served, and whose residence and post office address is c/o Mamie Lou Myrick, Rt 3 Box 57, Georgiana, Alabama, and that said respondent is in the belief of affiant over twenty-one years of age.



Affiant.

Sworn to and subscribed before me, this the 27th day of March, 1957.



Alice J. Duck, Register
Circuit Court.

NAOMI HARPER
COMPLAINANT

VS.

BENJAMIN FRANKLIN HARPER
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE NO. 3948

Personally appeared before me Arthur C. Epperson, Attorney of Record for complainant in the above styled cause, who being duly sworn, deposes and says that he is informed and verily believes that BENJAMIN FRANKLIN HARPER, the respondent in the above styled cause, is a nonresident of Baldwin County, Alabama, or conceals himself so that process can not be served, and whose residence and post office address is c/o Mamie Lou Myrick, Rt 3 Box 57, Georgiana, Alabama, and that said respondent is in the belief of affiant over twenty-one years of age.



Affiant.

Sworn to and subscribed before me, this the 27th day of March, 1957.

Alice J. Duck, Register
Circuit Court.

NAOMI HARPER
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS

IN EQUITY

BENJAMIN FRANKLIN HARPER
RESPONDENT

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

Your complainant Naomi Harper respectfully represents and shows
unto your Honor:

1. That the complainant is over the age of twenty-one 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 Benjamin Franklin Harper is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, to-wit: June 5, 1949, in Lucedale, Mississippi, and of this marriage there are two minor children, Gary Harper, born May 10, 1951, and Nolan Harper, born September 8, 1953, dependent upon the respondent.

3. Your complainant avers and charges that the said respondent did on or about the 4th day of August, 1956, and many times subsequent thereto, assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or 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 danger to her life or health.

4. 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.

5. Complainant avers that respondent is employed and making about \$65.00 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 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 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 minor children, permanent alimony for her support and maintenance and support and maintenance for said minor children,

your complainant prays for each other, further or general relief to which she may be entitled.

Arthur C. Epperson
SOLICITOR FOR COMPLAINANT

RESPONDENT'S ADDRESS:

c/o Mamie Lou Myrick
Rt 3 Box 57
XXXXXXXXXXXXXXXXXX
Georgiana, Alabama

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

3584
NAOMI HARPER
COMPLAINANT

VS

BENJAMIN FRANKLIN HARPER
RESPONDENT

ARTHUR C. EPPERSON
Attorney at Law
Foley, Ala.,

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 3984

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon EEB BENJAMIN FRANKLIN HARPER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

BENJAMIN FRANKLIN HARPER, Defendant

by NAOMI HARPER, Plaintiff

Witness my hand this 2nd day of March 19-57

Alice French, Clerk

No. 3984 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

NAOMI HARPER

Plaintiffs

vs.

BENJAMIN FRANKLIN HARPER

Defendants

Summons and Complaint

Filed 3/2/57 19____

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

3/2/ 1957

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 3984

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BEN BENJAMIN FRANKLIN HARPER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

BENJAMIN FRANKLIN HARPER

-----, Defendant

by NAOMI HARPER

-----, Plaintiff

Witness my hand this 2nd day of March 19 57

Deice J. ...

-----, Clerk

No. 3961r Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

NAOMI HARPER Plaintiffs

vs.

BENJAMIN FRANKLIN HARPER

Defendants

Summons and Complaint

Filed 3/2/57 19____

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

NAOMI HARPER
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS

IN EQUITY

BENJAMIN FRANKLIN HARPER
RESPONDENT

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

Your complainant Naomi Harper respectfully represents and shows
unto your Honor:

1. That the complainant is over the age of twenty-one 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 Benjamin Franklin Harper is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, to-wit: June 5, 1949, in Lucedale, Mississippi, and of this marriage there are two minor children, Gary Harper, born May 10, 1951, and Nolan Harper, born September 8, 1953, dependent upon the respondent.

3. Your complainant avers and charges that the said respondent did on or about the 4th day of August, 1956, and many times subsequent thereto, assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or 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 danger to her life or health.

4. 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.

5. Complainant avers that respondent is employed and making about \$65.00 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 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 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 minor children, permanent alimony for her support and maintenance and support and maintenance for said minor children

your complainant prays for each other, further or general relief to which she may be entitled.

Arthur C. Epperson
SOLICITOR FOR COMPLAINANT

RESPONDENT'S ADDRESS:

c/o Mamie Lou Myrick
Rt 3 Box 57
~~Georgia, XXXXXXXX~~
Georgiana, Alabama

IN THE CIRCUIT COURT OF
BAYLUM COUNTY, ALABAMA

IN EQUITY

COMPLAINANT
MAMIE LOU MYRICK

VS
RESPONDENT
MAMIE LOU MYRICK

Foley, A. J.,
Attorney at Law
ARTHUR C. EPPERSON

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 3984

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon ~~BN~~ BENJAMIN FRANKLIN HARPER

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against -----

----- ~~BENJAMIN FRANKLIN HARPER~~ -----, Defendant

by ----- ~~W. G. HARPER~~ -----

-----, Plaintiff

Witness my hand this 2nd day of March 19 57

Oliver J. Black, Clerk

No. 3981 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

HACHT HARPER Plaintiffs

vs.

BENJAMIN FRANKLIN HARPER
Defendants

Summons and Complaint

Filed 3/2/57 19____

Alice J. Luck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

NAOMI HARPER
COMPLAINANT

VS

BENJAMIN FRANKLIN HARPER
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

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

Your complainant Naomi Harper respectfully represents and shows
unto your Honor:

1. That the complainant is over the age of twenty-one 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 Benjamin Franklin Harper is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, to-wit: June 5, 1949, in Lucedale, Mississippi, and of this marriage there are two minor children, Gary Harper, born May 10, 1951, and Nolan Harper, born September 8, 1953, dependent upon the respondent.

3. Your complainant avers and charges that the said respondent did on or about the 4th day of August, 1956, and many times subsequent thereto, assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or 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 danger to her life or health.

4. 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.

5. Complainant avers that respondent is employed and making about \$65.00 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 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 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 minor children, permanent alimony for her support and maintenance and support and maintenance for said minor children

your complainant prays for each other, further or general relief to which she may be entitled.

Arthur C. Epperson
SOLICITOR FOR COMPLAINANT

RESPONDENT'S ADDRESS:

c/o Mamie Lou Myrick
Rt 3 Box 57
~~XXXXXXXXXXXX~~
Georgiana, Alabama

Arthur C. Epperson
Attorney at Law
ARTHUR C. EPPERSON

RESPONDENT
BENJAMIN FRANKLIN WEBBER

COMPLAINANT
MAMIE LOU MYRICK

IN EQUITY

BALDWIN COUNTY, ALABAMA
IN THE CIRCUIT COURT OF

[Handwritten signature]

RECORDED & INDEXED
MAY 11 1955
MAY 11 1955
MAY 11 1955

DOPE

ETHEL LEE TILLMAN
COMPLAINANT

VS.

WILLIE MAYO TILLMAN
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE NO. _____

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

Your complainant **ETHEL LEE TILLMAN** respectfully represents and shows unto your Honor:

1. That the complainant is over the age of sixteen years and is a resident of Baldwin County, Alabama, and have been a bona fide resident of said State for more than one year next preceding the filing of this bill of complaint; that **WILLIE MAYO TILLMAN**, the respondent, 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: February 19, 1955, at Foley, Alabama, and of this marriage, there is one minor child, Rosa Lee Tillman, born July 22, 1956, Foley, Alabama.


3. The complainant further avers that said respondent voluntarily abandoned the bed and board of complainant, for more than one year next preceding the filing of this bill of complaint, since which time complainant and respondent have not lived together nor in any way recognized each other as husband and wife.

4. Complainant avers that respondent is capable of making \$60.00 a week; that the complainant owns no property and has no means of support for herself and minor child; and that said respondent has refused and failed to provide for the support and maintenance of the complainant and said minor child; 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 hold a hearing and award the Complainant temporary care, control and custody of the said minor child, pending this suit, 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 child, 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 child, permanent alimony for her support and maintenance and support and maintenance for said minor child.

RESPONDENT'S ADDRESS:

Baldwin County Jail
Bay Minette, Alabama


Solicitor for Complainant