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NELLIE POLSON BELL
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

IN EQUITY

OLLIE H. BELL
RESPONDENT

CASE NO. _____

To the Honorable Judge of the Circuit Court of Baldwin County,
Alabama, Sitting in Equity:

Your complainant Nellie Polson Bell respectfully repre-
sents and show unto your Honor:

1. That 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 of said State for more than one year next preceeding
the filling of this bill of complaint; that Ollie H. Bell is over
twenty-one years of age and resides in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully
married on or about, to-wit; September 21st, 1925, at Elba, Alabama,
and of this marriage there is one dependent child, namely Nickie Bell,
twelve years of age.

3. Your complainant avers and charges that the
respondent did on or about the 28th day of February, 1957, 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 physi-
cal 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. The complainant avers and alleges that she is under
the care of a physician and is unable to work; that she has no means
of support for herself and minor child; she has no means with which
to pay her medical bill and that she has no means to pay her Solicitor
of record.

5. The complainant further avers and alleges that the
respondent is gainfully employed, that his income is approximately
\$90.00 a week, that the respondent has approximately \$2000.00 in
U. S. Savings Bonds and owns an automobile. The complainant further
avers and alleges that the respondent has no outstanding debts and
is well able to pay alimony for the support and maintenance of your
complainant and the dependent child of the marriage; her doctor and
medical bills and her Solicitor of record.

6. That the complainant further avers and alleges that
the minor, Nickie Bell has a highly nervous condition, which requires
that the child be placed in a special school and he is presently attend-
ing the Organic School in Fairhope, Alabama, which requires extra
expense for the transportation to and from the school, room and board
and tuition and for other things.

7. Your complainant further alleges that she with the funds provided by her own labor and efforts bought and purchased Lots 1 and 2, in Block 123, in the Addition to the Townsite of Summerdale, Alabama, with two houses thereon. Respondent further alleges this property was conveyed to the complainant and respondent jointly through mistake or misunderstanding on the part of the Grantors and further that there was no intention on the part of your complainant to make a gift of any part of this property to the respondent.

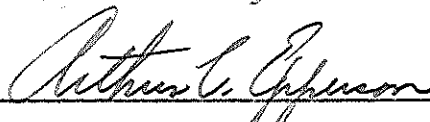
The premises considered, your complainant prays that your Honor will order service to be had according to law upon said respondent, commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law and that your Honor will hold a hearing and award the complainant 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, and that your Honor will order, permanent attorney fees for her attorney of record; that the respondent has no right, title or interest in the real property in which title is now being held jointly by the respondent and complainant and ordering the respondent to convey his title and interest in the same to your complainant, and your complainant prays for such other, further or general relief to which she may be entitled.


SOLICITOR FOR COMPLAINANT

Respondents Address:
Summerdale, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

Before me the undersigned authority, personally appeared Arthur C. Epperson, Attorney of record for the Complainant in the above styled cause, who first being duly sworn doth depose and say on oath as follows: that he is informed and believes, and upon such information and belief says that the allegation Contained in the Bill of Complaint are true.



Sworn to and subscribed before me this the 23 day of March 1957.

Alice J. Duck
Clerk of the Circuit Court.

NELLIE POLSON BELL
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

IN EQUITY

OLLIE H. BELL
RESPONDENT

CASE NO. _____

The matter of the sworn petition of the complainant in the above stated cause for temporary alimony having been presented to the court for an order of reference to the Register to ascertain and report the proper amount of temporary maintenance and support for complainant and the minor child of the marriage and solicitors' fees to be paid by the respondent pending the litigation in the above stated cause, and the same being duly considered by the Court, it is,

Ordered, adjudged and decreed by the Court that the Register of this Court be and is hereby ordered to hold a reference in accordance with the prayer of the petition, after giving the respondent as much as three days' notice of such reference, and to take testimony as to a proper amount to be allowed to complainant as temporary support and maintenance pending the litigation. Also a proper amount to be paid by respondent to the complainant's solicitors of record for their services in said cause, and make a report of his findings, together with the testimony. All other matters are held for further orders and decrees of this Court.

Done this 30th day of March, 1957.

HUBERT M. HALL /s/ _____
Judge.

NELLIE POLSON BELL
COMPLAINANT

CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

IN EQUITY

OLLIE H. BELL
RESPONDENT

To OLLIE H. BELL, RESPONDENT:

You are hereby notified that on the 5th day of ~~March~~, 1957, at 2:00 o'clock P.m., at the office of the Register, I shall proceed to execute the reference, as ordered and directed by the decree rendered in the above cause, at which time and place you are required to attend.

Witness my hand this 30th day of March, 1957.

Reverend J. H. H. H.
Register.

Executed by serving a copy of the within on OLLIE H. BELL, RESPONDENT, on this the _____ day of March, 1957.

Sheriff of Baldwin County, Ala.

NELLIE POLSON BELL
COMPLAINANT

VS.

OLLIE H. BELL
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE NO. _____

To the Honorable Judge of the Circuit Court of Baldwin County,
Alabama, Sitting in Equity:

Your complainant Nellie Polson Bell respectfully represents and show unto your Honor:

1. That 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 of said State for more than one year next preceeding the filling of this bill of complaint; that Ollie H. Bell is over twenty-one years of age and resides in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, to-wit; September 21st, 1925, at Elba, Alabama, and of this marriage there is one dependent child, namely Nickie Bell, twelve years of age.

3. Your complainant avers and charges that the said respondent did on or about the 28th day of February, 1957, 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. The complainant avers and alleges that she is under the care of a physician and is unable to work; that she has no means of support for herself and minor child; she has no means with which to pay her medical bill and that she has no means to pay her Solicitor of record.

5. The complainant futher avers and alleges that the respondent is gainfully employed, that his income is approximately \$90.00 a week, that the respondent has approximately \$2000.00 in U. S. Savings Bonds and owns an automobile. The complainant further avers and alleges that the repondent has no outstanding debts and is well able to pay alimony for the support and maintenance of your complainant and the dependent child of the marriage; her doctor and medical bills and her Solicitor of record.

6. That the complainant futher avers and alleges that the minor, Nickie Bell has a highly nervouss condition, which requires that the child be placed in a special school and he is presently attending the Organic School in Fairhope, Alabama, which requires extra expense for the transportation to and from the school, room and board and tuition andfor other things.

7. Your complainant further alleges that she with the funds provided by her own labor and efforts bought and purchased Lots 1 and 2, in Block 123, in the Addition to the Townsite of Summerdale, Alabama, with two houses thereon. Respondent further alleges this property was conveyed to the complainant and respondent jointly through mistake or misunderstanding on the part of the Grantors and further that there was no intention on the part of your complainant to make a gift of any part of this property to the respondent.

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, and that your Honor will order, permanent attorney fees for her attorney of record; that the respondent has no right, title or interest in the real property in which title is now being held jointly by the respondent and complainant and ordering the respondent to convey his title and interest in the same to your complainant, and your complainant prays for such other, further or general relief to which she may be entitled.

Arthur C. Epperson
SOLICITOR FOR COMPLAINANT

Respondents Address:
Summerdale, Alabama

STATE OF ALABAMA
BALDWIN COUNTY

Before me the undersigned authority, personally appeared Arthur C. Epperson, Attorney of record for the Complainant in the above styled cause, who first being duly sworn doth depose and say on oath as follows: that he is informed and believes, and upon such information and belief says that the allegation Contained in the Bill of Complaint are true.

Arthur C. Epperson

Sworn to and subscribed before me this the 23 day of March 1957.

Alice J. Duck
Clerk of the Circuit Court.

NELLIE POLSON BELL
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

OLLIE H. BELL
RESPONDENT

IN EQUITY

CASE NO. _____

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Ordered, adjudged and decreed by the Court that the Register of this Court be and is hereby ordered to hold a reference in accordance with the prayer of the petition, after giving the respondent as much as three days' notice of such reference, and to take testimony as to a proper amount to be allowed to complainant as temporary support and maintenance pending the litigation. Also a proper amount to be paid by respondent to the complainant's solicitors of record for their services in said cause, and make a report of his findings, together with the testimony. All other matters are held for further orders and decrees of this Court.

Done this 30 day of March, 1957.

Hubert M. Free
Judge.

NELLIE POLSON BELL
COMPLAINANT

CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA

OLLIE H. BELL
RESPONDENT

IN EQUITY

To OLLIE H. BELL, RESPONDENT:

april You are hereby notified that on the 5 day of April, 1957, at 2:00 o'clock P.m., at the office of the Register, I shall proceed to execute the reference, as ordered and directed by the decree rendered in the above cause, at which time and place you are required to attend.

Witness my hand this 30 day of March, 1957.

Levin J. Wheeler
Register.

Executed by serving a copy of the within on OLLIE H. BELL, RESPONDENT, on this the _____ day of March, 1957.

Sheriff of Baldwin County, Ala.

R. date 3999

Nellie Tolson Bell

vs.

Ollie H. Bell

Received 1 day of April 1957

and on 2 day of Apr 1957

I served a copy of the within notice
on Alice H. Bell.

By service on _____

TAYLOR WILKINS, Sheriff

By [Signature] D. S.

Summedale

Sheriff claims 60 ~~600~~ miles at

Ten Cents per mile Total \$ 6.00
TAYLOR WILKINS, Sheriff

BY [Signature]
DEPUTY SHERIFF

FILED

MAR 25 1957

ALICE L. BRICK, Register

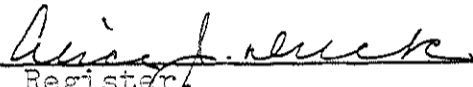
NELLIE POLSON BELL,
Complainant,
vs.
OLLIE H. BELL,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY. NO. 3999

ORDER CONTINUING REGISTER'S REFERENCE

In this cause it appearing to the Register that the Respondent desires a continuance in this cause, it is therefore, ORDERED AND DECREED that the Register's reference heretofore ordered in this cause be continued until April 11, 1957, at three o'clock P. M.

ORDERED AND DECREED on this the 4th day of April, 1957.


Register.

NELLIE POLSON BELL
COMPLAINANT

VS.

OLLIE H. BELL
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE NO. _____

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2. That your complainant and respondent were lawfully married on or about, to-wit; September 21st, 1925, at Elba, Alabama, and of this marriage there is one dependent child, namely Nickie Bell, twelve years of age.
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5. The complainant further avers and alleges that the respondent is gainfully employed, that his income is approximately \$90.00 a week, that the respondent has approximately \$2000.00 in U. S. Savings Bonds and owns an automobile. The complainant further avers and alleges that the respondent has no outstanding debts and is well able to pay alimony for the support and maintenance of your complainant and the dependent child of the marriage; her doctor and medical bills and her Solicitor of record.
6. That the complainant further avers and alleges that the minor, Nickie Bell has a highly nervous condition, which requires that the child be placed in a special school and he is presently attending the Organic School in Fairhope, Alabama, which requires extra expense for the transportation to and from the school, room and board and tuition and for other things.

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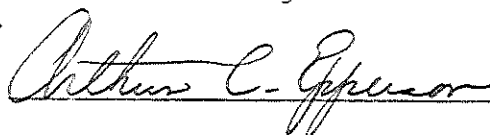
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SOLICITOR FOR COMPLAINANT

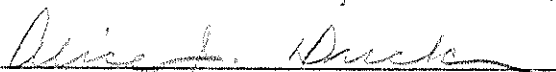
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Summerdale, Alabama

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BALDWIN COUNTY

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Clerk of the Circuit Court.