

OLIVER SHOOTS,)	
Complainant,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA
BERNICE SHOOTS,)	IN EQUITY. NUMBER 2954
Respondent.)	

AMENDMENT TO ANSWER AND CROSS BILL

Now comes the Respondent and Cross Complaint, Bernice Shoots, and amends the Answer and Cross Bill heretofore filed in this cause by striking therefrom the following sentence: "The Respondent is now pregnant and has no property to maintain and support herself and it is necessary that she be maintained and supported by the Complainant whose failure to properly support her is without fault on her part.", and by adding thereto the following sentence: "That there was born to this marriage one child, Lavander Shoots, a son whose date of birth is March 1, 1953; that Respondent has no property to maintain and support herself and this child, and it is necessary that she be maintained and supported by the Complainant whose failure to properly support her is without fault on her part."

Attorney for Respondent and Cross Complainant.

RECORDED

AMENDMENT TO ANSWER
AND CROSS BILL

OLIVER SHOOTS,
Complainant,
VS.
BERNICE SHOOTS,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY. NUMBER 2954

FILED

4-15-53

ALICE J. DUCK, Clerk

by the said Complainant and that she is without funds to pay her said attorney for services rendered and to be rendered by him in this cause.

PRAYER FOR PROCESS

Respondent prays that this answer be taken and treated in all respects as a Cross Bill and that the usual process of this Honorable Court issue to Complainant and Cross Respondent, Oliver Shoots, requiring him to appear and plead, answer or demur to this Cross Bill within the time prescribed by law and under the rules and practice of this Honorable Court.

PRAYER FOR RELIEF

Respondent and Cross Complainant respectfully prays for the following separate and several relief:

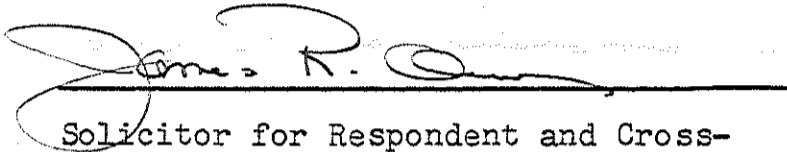
1. That a reference be held to ascertain and fix a reasonable sum to be paid to Respondent and Cross Complainant as alimony pendente lite and to ascertain and fix a reasonable amount to be paid to Respondent and Cross Complainant's Solicitor of record for services rendered and to be rendered by him in this cause.

2. That when the said reference is held and the Register Report thereof made, a decree be rendered fixing the amount of alimony pendente lite and an amount to be paid to Respondent and Cross Complainant's Solicitor of record for services rendered and to be rendered by him in this cause.

3. That on a final hearing of this cause, the Court will make and enter a proper decree divorcing the Respondent and Cross Complainant from the Complainant and Cross Respondent, and will fix a reasonable amount to be paid to the Respondent and Cross Complainant in a lump sum for alimony from the time of the commencement of this suit up to the date of this Decree and a reasonable monthly sum to be paid to her as alimony after the date of the said Decree.

4. Respondent and Cross Complainant further prays for such other, further and general relief as she may be equitably entitled to the premises considered.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "James R. Quinn", is written over a horizontal line. The signature is stylized with a large initial "J" and a long, sweeping underline.

Solicitor for Respondent and Cross-Complainant.

OLIVER SHOOTS,
Complainant,
- vs -
BEATRICE SHOOTS,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
No. 2954

ANSWER TO CROSS-BILL AND AMMENDMENT TO BILL OF COMPLAINT

Now comes the Complainant and cross-respondent, Oliver Shoots, and for answer to the cross-bill of complainant heretofore filed in this cause by Beatrice Shoots, the Respondent, says as follows:

He denies the allegations of the cross-bill of complaint and each and every count and paragraph thereof.

Oliver Shoots, the Complainant, hereby ammends the Bill of Complaint heretofore filed in said cause by striking therefrom the prayer for relief and adding the following:

PRAYER FOR PROCESS AND RELIEF

That upon a final hearing of this cause your Complainant be granted a divorce from said Respondent on the grounds of her pregnancy at the time of marriage without his knowledge or agency. Complainant further prays that your Honor will exercise jurisdiction and authority granted to him in the Court of Equity and enter a decree showing that it is the findings and therefore the judgment of this Court that the Complainant, Oliver Shoots, is not the father of a child born to the said Beatrice Shoots in the month of March, 1953, which is the child born of the pregnancy referred to in said Bill of Complaint, and that the said Oliver Shoots, the Complainant in this cause, shall not be in any way responsible for said Child nor shall said child inherit from the said Oliver Shoots, nor shall said child in any way be considered as the legal child of the said Oliver Shoots, the Complainant in this cause.

Should your Complainant be mistaken in the relief prayed for that there be granted to him such other, different and general relief to which he may be entitled and as in duty bound he will ever pray.

The State of Alabama, _____ County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon Bernice Shoots

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State _____ by _____

Oliver Shoots

against Bernice Shoots

Herein fail not. Due return make of this writ as the law directs.

Witness this 3rd day of February, 1953

Herc J. Shuck, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

OLIVER SHOOTS,
Complainant,

-vs-

BERNICE SHOOTS,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your Complainant, Oliver Shoots, respectfully represents and shows unto your Honor:-

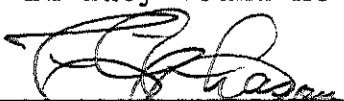
1. That your Complainant is over the age of twenty-one years and is a resident of said County and State, and has been a bona fide resident of said State for more than one year next preceding the filing of this Bill of Complaint; that Bernice Shoots is over the age of twenty-one years and is a resident of Foley, Baldwin County, Alabama.

2. That your complainant and the respondent were lawfully married on, to-wit, September 13, 1952, in Lucedale, Mississippi, but were residents of Baldwin County, Alabama, both before and after marriage.

3. Complainant further avers and alleges that at the time of marriage the respondent was pregnant without his knowledge or agency.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: Your complainant prays that Bernice Shoots be made a party defendant to this cause by the usual process of this Honorable Court, requiring her to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that upon a final hearing of this cause, that your complainant be granted a divorce from said respondent. Should your complainant be mistaken in the relief prayed for that there be granted to him such other, different and general relief to which he may be entitled and as in duty bound he will ever pray.


Solicitor for Complainant


Complainant

(Respondent is a resident of the Aaronville Colored Quarters in Foley, Alabama.)

TO THE DIRECTOR, FBI

Washington, D.C.

FROM: SAC, NEW YORK

SUBJECT: [Illegible]

2954

Reference is made to...

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