

BILL DUNNAM,	:	
Complainant,	:	IN THE CIRCUIT COURT OF BALDWIN
	:	
-vs-	:	COUNTY, ALABAMA. IN EQUITY.
	:	
IRA DUNNAM,	:	CASE NUMBER _____
Respondent.	:	

ANSWER AND CROSSBILL.

Comes the Respondent in the above styled cause and for answer to the Complainant's bill says:

Respondent admits the allegations in paragraph one as to age and marriage and the existance of the issue of this marriage, but she denies the allegation as to the residence of the complainant and alleges that he was a resident of Mobile county, Alabama until his desertion of this respondent on to-wit the fifteenth day of Febuary, 1934.

Respondent admits the allegation that the parties lived together as husband and wife from the date of the marriage to about Febuary fifteenth, 1934. Respondent denies that she left his bed and board. Respondent admits that they have not co-habited since the twenty-seventh day of February, 1934 up until the present time.

Respondent asks that this answer be taken as her Cross-bill and shows unto the court the following facts:

ONE. Cross-Complainant has been a bona fide resident of the State of Alabama for the three years next preceeding the filling this her crossbill and that the Cross-Respondent is a resident of Baldwin county, Alabama.

TWO. The parties to this cause were married on to-wit the fifteenth of August, 1932 and lived together as husband and wife up until about Febuary fifteenth, 1934 when the cross-respondent voluntarily abandoned this cross-complainant without just cause or legal excuse. Cross-complainant alleges that this desertion and abandonment has been continuous and that she and the Cross-respondent have not cohabited or lived together as man and wife since the fifteenth of Febuary, 1934.

THREE. That there was born of said marriage, a daughter by the name of Marie Dunnam on November fifth, 1934 and said child

is of tender age and needs a mother's care. Cross-complainant alleges that she is without funds or an estate to properly provide for herself and Marie Dunnam or to employ and pay her solicitors for their services in this cause and that the Cross-respondent is an able bodied man with an estate and earning wages and able to make provisions for her and his child.

THE PREMISES CONSIDERED, Cross-complainant prays that the Cross-respondent be made a party defendant to this her cross-bill and by appropriate process required to answer same within the time proscribed by law and obey such orders and decrees as may be made in the premises.

Cross-complainant further prays that an order of reference issue forthwith commanding the Register of this Honorable Court to ascertain and report upon a suitable amount to be allowed Cross-complainant as permanent alimony, and a further amount to be allowed to defray the expenses of this action and for counsel fees and for the Cross-complainant's support and that of the child Marie Dunnam during the pendency of this action, and that the cross-respondent be required to pay these sums by this Honorable Court.

Cross-complainant further prays that on the final hearing of this cause a decree be rendered granting her the custody of the child of this marriage and forever divorcing her from the said Bill Dennam, and granting her the right to remarry should she so desire and such sum as premanent alimony as may be fit and proper.

Cross-complainant prays for such other further, different or additional relief as to equity may seem meet.

CP Shannon

CP Shannon
SOLICITORS FOR CROSS-COMPLAINANT.

FOOTNOTE: The Cross-respondent is required to answer each and every paragraph of the foregoing bill from one to three both inclusive, but not under oath.

CP Shannon

CP Shannon
SOLICITORS FOR CROSS-COMPLAINANT.

BILL DUNNAM,

COMPLAINANT

-vs-

IRA DUNNAM.

RESPONDENT AND
CROSS COMPLAINANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY NUMBER 201.

AGREEMENT AS TO THE CUSTODY OF THE CHILD MARIE DUNNAM.

It is agreed by and between by parties to this cause by their counsel and solicitors of record that the following facts are true and are admitted without the necessity of further proof.

First: That the issue of this marriage, Marie Dunnam is an infant of about two and onehalf years of age and is now, and has always been with her mother, the respondent and that said mother has taken care of it while the parties were seperated and now desires to have the custody and controle of said child.

Second: That the Complainant Bill Dunnam does not want the custody, care or controle of said child and consents that its custody, care and controle be given to the Respondent Ira Dunnam.

Wherefore both parties respectfully request the Court to grant to the Respondent, Ira Dunnam, the custody, care and controle of the issue of this marriage Marie Dunnam, the same being in the opinion of the parties to the best interest of said child.

Bill Dunnam, Complainant

by


His Solicitor.

Ira Dunnam, Respondent and
Cross-complainant.

By C. R. Shannon.


Her Solicitors.

Testimony of Frank Howell,
in cross examination
by E. R. K. K. K.

I knew Mrs & Mrs Deanna
when they separated about 30
four years ago. I was living
at ~~Marion~~ when they separated.
They separated in the last part of the
summer about three years ago.
He wanted to leave there. I personally
heard him request her to go with
him. She refused to go & said that she
did not have to go with him.

When he left he did not have any
work in sight. She went to Lueddale
& came back ~~to~~ reported that he had
work & tried to get her to go with him
& she would not so he left.
I further believe that it will be best for the
child ~~ma~~ who is about 3 or 4 years old to be with its mother.

Subscribed &
I was before
me on this the

Frank Howell

7 day of December 1937

Joyce James
Commissioner

Mrs Carmine Howell,

an ^{examination}
by ^{U.S. F. Dept.}

I personally know that after
Mr Deanna & Mrs Deanna
separated Mr Deanna requested
Mrs Deanna to go with him
& she refused. At the time he
did request her to go with him
he was able to support them.

I further believe that
it will be to the best for the
child Marie Deanna to stay with
its mother.

X Carmine Howell

Subscribed & sworn
to before me this the
7 day of January, 1937

Joyce Lane
Commissioner

BILL DUNNAM
Complainant,

vs.

IRA DUNNAM
Respondent

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

No. _____.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY

Your complainant, Bill Dunnam, exhibits this, his bill against Ira Dunnam and respectfully shows unto your honor as follows:

That complainant has been a bona fide resident of the State of Alabama, Baldwin County for more than three years, next, immediately preceding the filing of this Bill of Complaint; that both the respondent and complainant are over the age of twenty-one years and that the complainant married respondent on or about August 15 1932 in the city of Mobile, Alabama, and that there is one child born after she deserted your complainant, a girl.

Complainant alleges and avers that the respondent lived with him as husband and wife from August 12 1932 to on or about February 27, 1934 at which time the respondent voluntarily left the bed and board of your complainant without cause or fault on his part and has never returned to your complainant, nor cohabited with him as husband and wife from the 27th day of February 1934 to the date of the filing of this bill. Said abandonment by respondent continuing for more than two years, next, preceding the filing of this bill.

The premises considered, complainant prays that said Ira Dunnam be made a party to this Bill of Complaint and that she be brought into Court by personal service by subjecting her to plead, answer or demur to the allegations as set out against her in said Bill of Complaint as filed in this cause in all respects as required by law and under the rules of this Honorable Court.

BILL DUNNAM,

VS.

IRA DUNNAM,

Complainant,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 201.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Your Complainant, Bill Dunnam, exhibits this, his bill against Ira Dunnam and respectfully shows unto your Honor as follows:

That Complainant has been a bona fide resident of the State of Alabama, Baldwin County for more than three years, next, immediately preceding the filing of this Bill of Complaint; that both the Respondent and Complainant are over the age of twenty-one years and that the Complainant married Respondent on or about August 15, 1932, in the city of Mobile, Alabama, and that there is one child born after she deserted your complainant, a girl.

Complainant alleges and avers that the Respondent lived with him as husband and wife from August 12, 1932 to on or about February 27, 1934 at which time the Respondent voluntarily left the bed and board of your Complainant without cause or fault on his part and has never returned to your Complainant, nor cohabited, with him as husband and wife from the 27th day of February, 1934, to the date of the filing of this bill. Said abandonment by Respondent continuing for more than two years, next, preceding the filing of this bill.

The premises considered, Complainant prays that said Ira Dunnam be made a party to this Bill of Complaint and that she be brought into Court by personal service by directing her to plead, answer or demur to the allegations as set out against her in said Bill of Complaint as filed in this cause in all respects as required by law and under the rules of this Honorable Court.