

CIRCUIT COURT, BALDWIN COUNTY, ALA., IN EQUITY.

Maries B Lambert

VS.

George M Lambert

PLAINTIFF

DEFENDANT

No. 23

Bill of Costs

| | Dollars | Cts. | | | |
|---|---------|------|---|---------|-------|
| Fees of Register | | | Brought Forward | | |
| Filing each bill and other papers..... | 10 | | For receiving, keeping and paying out or distributing money, etc.; 1st \$1,000 1 per ct.; all over \$1,000, and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000, and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct. | | |
| Issuing each subpoena..... | | 50 | Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received, | 15 | |
| Issuing each copy thereof..... | | 40 | Each Notice sent by mail to creditors..... | 25 | |
| Entering each return thereof..... | | 15 | Filing, Receipting for and docketing each claim, etc..... | 50 | 50 |
| For each order of publication..... | 1 00 | | For all entries on subpoena docket, etc..... | 50 | |
| Issuing writ of injunction..... | 1 50 | | For all entries on commission docket, etc..... | 50 | |
| For each copy thereof..... | | 50 | Making final record, per 100 words..... | 15 | |
| Entering each return thereof..... | | 15 | Certified copy of decree..... | 1 00 | 4 00 |
| Issuing writ of attachment..... | 1 00 | | Report of divorce to State Health office..... | 50 | 2 00 |
| Entering each return thereof..... | | 15 | Acts 1915 | | 50 |
| Docketing each case..... | 1 00 | | Total Fees of Register | | 13 40 |
| Entering each appearance..... | 25 | | | | 50 |
| Issuing each decree pro confesso on persl ser | 1 00 | | Fees of Sheriff | | |
| Issuing each decree pro confesso on publication..... | 1 00 | | Serving and returning subpoena on deft..... | \$ 1 50 | 1 50 |
| Each order appointing guardian..... | 1 00 | | Serving and returning subpoena for witness..... | 65 | |
| Any other order by Register..... | 50 | | Levying attachment..... | 1 50 | |
| Issuing commission to take testimony..... | 50 | | Entering and returning same..... | 25 | 25 |
| Receiving and filing..... | 10 | | Selling property attached..... | 75 | |
| Endorsing each package..... | 10 | | Impaneling Jury..... | 75 | |
| Entering order submitting cause..... | 50 | | Executing writ of possession..... | 2 50 | |
| Entering any other order of Court..... | 25 | | Collecting execution for costs..... | 1 50 | |
| Noting all testimony..... | 50 | | Serving and returning sci. fa., each..... | 65 | |
| Abstract of cause, etc..... | 1 00 | | Serving and returning notice..... | 65 | |
| Entering each decree..... | 75 | | Serving and returning writ of injunction..... | 1 50 | |
| For every 100 words over 500..... | 15 | | Serving and returning writ of exeat..... | 1 50 | |
| Taking account, etc..... | 3 00 | | Taking and approving bonds, each..... | 75 | |
| Taking testimony, etc..... | 15 | | Collecting money on execution..... | 2 50 | |
| Each report, 500 words or less..... | 2 50 | | Making deed..... | 2 50 | |
| For every 100 words over 500..... | 15 | | Serving and returning application, etc..... | 1 00 | |
| Amount claimed less than \$500, etc..... | 2 00 | | Serving attachment, contempt of court..... | 1 50 | |
| Issuing each subpoena..... | 25 | | Total Fees of Sheriff | | 17 50 |
| Witness certificate, each..... | 25 | | | | |
| Issuing execution, each..... | 75 | | Recapitulation | | |
| Entering each return..... | 15 | | Register's Fees..... | | 13 40 |
| Taking and approving bond, each..... | 1 00 | | Sheriff's Fees..... | | 1 50 |
| Making copy of bill, etc..... | 15 | | Commissioner's Fees..... | | 6 00 |
| Each notice not otherwise provided for..... | 50 | | Solicitor's Fees..... | | |
| Each certificate or affidavit, with seal..... | 50 | | Witness Fees..... | | |
| Each certificate or affidavit, no seal..... | 25 | | Guardian Ad Litem..... | | |
| Hearing and passing on application, etc..... | 3 00 | | Printer's Fees..... | | |
| Each settlement with receiver, etc..... | 3 00 | | Trial Tax..... | 3 00 | 3 00 |
| Examining each voucher of receiver, etc..... | 10 | | Recording Decree in Probate Court..... | | |
| Examining each answer, etc..... | 3 00 | | TOTAL | | 23 50 |
| Recording resignation, etc..... | 75 | | | | 30 |
| Entering each certificate to Supreme Court..... | 50 | | | | 33 50 |
| Taking questions and answers, etc..... | 25 | | | | |
| For all other service relating to such proceedings..... | 1 00 | | | | |
| For services in proceeding to relieve minors, etc., same fees as in similar cases. | | | | | |
| Commission on sales, etc.: 1st \$100, 2 per cent.; all over \$100, and not exceeding 1,000, 1 1-2 per ct.; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct. | | | | | |
| Sub Total Carried Forward..... | | | | | |

Received payment this 1 day of Apr. 19336

R B D

Register.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
No. 202

Spring Term, 192~~38~~³⁶

William W Hobbs

Complainant

vs. Francis G Hobbs.

Defendant

In this cause it appears to the Register Robert S Duck. that the order of publi-
cation heretofore made in this cause, was published for four consecutive weeks, commencing on the
12th day of March, 192³⁶, in the Fairhope Courier.

a newspaper published in Baldwin County, Alabama, that a copy of said order was posted
at the Court House door in Baldwin County, on the 4th day of
March 192³⁶, and

And it now further appearing to the Register Robert S Duck., that the said
Francis G Hobbs,

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it
is now, therefore, on motion of Complainant, ordered and decreed by the Register
Robert S Duck. that the Bill of Complaint in this cause be, and it hereby is in all things
taken as confessed against the said Francis G Hobbs.

This 18th day of May 192³⁶

Robert S Duck Register.

CIRCUIT COURT, BALDWIN COUNTY, ALA., IN EQUITY.

William W. Hobbs

PLAINTIFF

No. *502*

VS.

Francis H. Hobbs

DEFENDANT

Bill of Costs

| Fees of Register | Dollars | Cts. | Brought Forward | |
|---|---------|------|---|-----------------|
| Filing each bill and other papers <i>10</i> | \$ | 10 | For receiving, keeping and paying out or distributing money, etc.; 1st \$1,000 1 per ct.; all over \$1,000, and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000, and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct. | 695 |
| Issuing each subpoena | | 50 | Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received. | |
| Issuing each copy thereof | | 40 | Each Notice sent by mail to creditors | 15 |
| Entering each return thereof | | 15 | Filing, Receipting for and docketing each claim, etc. | 25 |
| For each order of publication | 1 | 00 | For all entries on subpoena docket, etc. | 50 |
| Issuing writ of injunction | 1 | 50 | For all entries on commission docket, etc. | 50 |
| For each copy thereof | | 50 | Making final record, per 100 words | 15 |
| Entering each return thereof | | 15 | Certified copy of decree | 1 00 |
| Issuing writ of attachment | 1 | 00 | Report of divorce to State Health office Acts 1915 | 50 |
| Entering each return thereof | | 15 | Total Fees of Register | 1275 |
| Docketing each case | | 25 | Fees of Sheriff | |
| Entering each appearance | | 25 | Serving and returning subpoena on deft. | \$ 1 50 |
| Issuing each decree pro confesso on persi ser | 1 | 00 | Serving and returning subpoena for witness | 65 |
| Issuing each decree pro confesso on publication | 1 | 00 | Levying attachment | 1 50 |
| Each order appointing guardian | 1 | 00 | Entering and returning same | 25 |
| Any other order by Register | | 50 | Selling property attached | |
| Issuing commission to take testimony | | 50 | Impaneling Jury | 75 |
| Receiving and filing | | 10 | Executing writ of possession | 2 50 |
| Endorsing each package | | 10 | Collecting execution for costs | 1 50 |
| Entering order submitting cause | | 50 | Serving and returning sci. fa., each | 65 |
| Entering any other order of Court | | 25 | Serving and returning notice | 65 |
| Noting all testimony | | 50 | Serving and returning writ of injunction | 1 50 |
| Abstract of cause, etc. | 1 | 00 | Taking and returning writ of exeat. | 1 50 |
| Entering each decree | | 75 | Serving and approving bonds, each | 75 |
| For every 100 words over 500 | | 15 | Collecting money on execution | |
| Taking account, etc. | | 5 00 | Making deed | 2 50 |
| Taking testimony, etc. | | 15 | Serving and returning application, etc. | 1 00 |
| Each report, 500 words or less | | 2 50 | Serving attachment, contempt of court | 1 50 |
| For every 100 words over 500 | | 15 | Total Fees of Sheriff | |
| Amount claimed less than \$500, etc | | 2 00 | Recapitulation | |
| Issuing each subpoena | | 25 | Register's Fees | |
| Witness certificate, each | | 25 | Sheriff's Fees | |
| Issuing execution, each | | 75 | Commissioner's Fees <i>Mary Ann Miller</i> | |
| Entering each return | | 15 | Solicitor's Fees | |
| Taking and approving bond, each | 1 | 00 | Witness Fees | |
| Making copy of bill, etc | | 15 | Guardian Ad Litem | |
| Each notice not otherwise provided for | | 50 | Printer's Fees <i>Janet's Case</i> | |
| Each certificate or affidavit, with seal | | 50 | Trial Tax | 3 00 |
| Each certificate or affidavit, no seal | | 25 | Recording Decree in Probate Court | |
| Hearing and passing on application, etc. | | 3 00 | TOTAL | 2887 |
| Each settlement with receiver, etc. | | 3 00 | | 500 |
| Examining each voucher of receiver, etc | | 10 | | |
| Examining each answer, etc. | | 3 00 | | |
| Recording resignation, etc. | | 75 | | |
| Entering each certificate to Supreme Court | | 50 | | |
| Taking questions and answers, etc. | | 25 | | |
| For all other service relating to such proceedings | | 1 00 | | |
| For services in proceeding to relieve minors, etc., same fees as in similar cases. | | | | |
| Commission on sales, etc.: 1st \$100, 2 per cent.; all over \$100, and not exceeding 1,000, 1 1-2 per ct.; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct. | | | | |
| Sub Total Carried Forward | | | | |


Received payment this 1 day of June 1936 *Robert S. Duck* Register.

3-362


STATE OF ALABAMA

COUNTY OF BALDWIN

BEFORE me personally appeared Orvis M. Brown, who, being duly sworn, says that he is solicitor for Complainant in the case of William W. Hobbs against Frances G. Hobbs; that Respondent, Frances G. Hobbs, last known residence was Pensacola, Florida, that said Respondent deserted your Complainant and has not been seen nor heard from by him in several months; that Complainant and Respondent, are both over the age of 21 years; that they were married in Milton Florida, in 1933; that William W. Hobbs and Frances G. Hobbs were residents of Pensacola, Florida when the Respondent deserted your Complainant.


SOLICITOR FOR COMPLAINANT.

SWORN to before me, and signed before me this the 5th day of March, 1936.


REGISTER OF THE CHANCERY COURT.
Chanc. Court.

ORAL EXAMINATION

I, Marguerite Middleton as Register and Commissioner hereby certify that the foregoing deposition ^{SD} on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and Solicitor for the Complainant at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proof made before me of the identity of said witness es; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof. I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 18th day of May 1936.

Marguerite Middleton (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

WILLIAM W. HOBBS

COMPLAINANT

vs.

FRANCES G. HOBBS

RESPONDENT

ORAL DEPOSITION

Filed May 21, 1936

Marguerite Middleton, Register.

RECORDED IN

Record _____

Vol. _____ Page _____

Register _____

202

THE STATE OF ALABAMA, }
Baldwin County.

No. 202

Circuit Court, In Equity

WILLIAM W HOBBS.

Complainant.....

vs.

FRANCIS G HOBBS.

Defendant.....

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS THEREFORE Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the Complainant is forever divorced from the Defendant.

On Account of Voluntarily Abandonment.

.....
.....
.....
.....
.....
.....

It is further ordered that the said WILLIAM W HOBBS. be, and he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said WILLIAM W HOBBS. pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may be issued against the said

It is further ordered, adjudged and decreed that said WILLIAM W HOBBS. shall not again marry except to said FRANCIS G. HOBBS. until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said FRANCIS G. HOBBS. during the said pendency of appeal

This 21st day of May 1936.

J. W. Hare
Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, }
Baldwin County.

Circuit Court, In Equity.

I, Robert S. Duck. Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the day of May 1936 in the cause of

WILLIAM W HOBBS.

Complainant.....

vs.

FRANCIS G HOBBS.

Defendant.....

as appears of record in said Court.

Witness my hand and the seal of said Court, this the

day of May 1936.

Register

WILLIAM W. HOBBS

Complainant,

VS.

FRANCES G. HOBBS,

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, William W. Hobbs, exhibits this, his Bill of Complaint against Frances G. Hobbs and respectfully shows unto your honor as follows:

That complainant has been a bona fide resident of the State of Alabama and 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 twentyone years and that complainant married respondent on or about March 20th 1933 in the city of Milton Florida and that there is only one child the fruit of said marriage which is now with the respondent.

Complainant alleges and avers that the respondent lived with him as husband and wife from March 20th 1933 until about April 10th 1933, 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 tenth of April 1933 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 Frances G. Hobbs be made a party to this Bill of Complaint and that she be brought into Court by personal service by publication 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

The State of Alabama, {
Baldwin County

CIRCUIT COURT

To MARGUERITE MIDDLETON:

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine William W. Hobbs, J. C. Marshall, and E. Riggins

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein WILLIAM W. HOBBS is

Complainant

and

FRANCES G. HOBBS

Defendant,

on oath to be by you administered, upon oral examination to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 22nd day of April 19 36

Robert A. Duck
REGISTER

COMMISSIONER'S FEE, \$ 5.00

WITNESS' FEES, \$ None.

WILLIAM W. HOBBS

Complainant,

VS.

FRANCES G. HOBBS,

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, William W. Hobbs, exhibits this, his Bill of Complaint against Frances G. Hobbs and respectfully shows unto your honor as follows:

That complainant has been a bona fide resident of the State of Alabama and 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 twentyone years and that complainant married respondent on or about March 20th 1933 in the city of Milton Florida and that there is only one child the fruit of said marriage which is now with the respondent.

Complainant alleges and avers that the respondent lived with him as husband and wife from March 20th 1933 until about April 10th 1935, at which time the respondent voluntarily left the bed and board of your complainant without cause or fault in his part and has never returned to your complainant, nor cohabited with him as husband and wife from the tenth of April 1935 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 Frances G. Hobbs be made a party to this Bill of Complaint and that she be brought into Court by personal service by publication 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.

And your complainant prays that upon the final hearing of this cause, this Honorable Court will grant unto him an absolute divorce, dissolving entirely the bonds of matrimony now existing between him and Frances G. Hobbs and granting him the right to marry again and your complainant prays for such other and further relief as in Equity and good conscience he may be entitled to in the premises for which he will ever pray.

Oliver M. Brown
SOLICITOR FOR COMPLAINANT

FOOT NOTE

The respondent is required to answer, but not under oath, the same being hereby expressly waived, as to each and every paragraph on the foregoing Bill of Complaint.

Oliver M. Brown
SOLICITOR FOR COMPLAINANT.

IN SENATE HOUSE
503
COMPLAINANT
FRANCES G. HOBBS
BY
RESPONDENT
BILL OF COMPLAINT
IN THE CIRCUIT COURT OF
PRIMA COUNTY, TENNESSEE
Oliver M. Brown
SOLICITOR FOR COMPLAINANT

Check
RECORDED

2-207

No. 202

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY
Baldwin County, Ala.

WILLIAM W HOBBS.

VS.

FRANCIS G HOBBS.

DECREE OF DIVORCE

Filed in office this

23

day of MAY 1936

Robert Neal
REGISTER

E. O. M.

ROONE PRINTING CO., BAY MINETTE, ALA.

NO _____

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

WILLIAM W. HOBBS

Complainant

vs.

FRANCES G. HOBBS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

MARGUERITE MIDDLETON

WITNESSES:

WILLIAM W. HOBBS

J. C. MARSHALL

E. RIGGINS.

Copy

IN EQUITY NO. 202

WILLIAM W. HOBBS,
Complainant,

VS.

FRANCIS G. HOBBS,
Respondent,

BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

FILED THIS 13th Day of May 1936
Orvis M. Brown
Clerk-Register

Orvis M. Brown
Solicitor for Complainant
Robertsdale, Alabama

0

[Faint, mostly illegible text, possibly bleed-through from the reverse side of the page]

MAMIE B. LAMBERT,
Complainant,
VS.
GEORGE M. LAMBERT,
Respondent.

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

This cause coming on to be heard was submitted upon the original Bill of Complaint on behalf of the Complainant, Answer and Waiver of the Respondent, and Testimony as noted by the Register, and the Court, after due consideration, is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant and the Respondent be, and they are hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED that the Respondent pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said MAMIE B. LAMBERT shall not again marry, except to the said GEORGE M. LAMBERT, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said GEORGE M. LAMBERT, during the pendency of the appeal.

19th Dated at Monroeville, Monroe County, Alabama, this day of March, 1936.

J. W. Hare
Judge of the Circuit Court of
Baldwin County, Alabama.

The State of Alabama }
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

MAMIE B. LAMBERT

COMPLAINANT

VS.

GEORGE M. LAMBERT

RESPONDENT

I, Robert A. Duck

as Register and Commissioner

have called and caused to come before me Mamie B. Lambert
and Edna Herron

witnesses named in the requirement for Oral Examination, on the 16 day of Mar.
1936, at the office of _____

in Bay Minette, Alabama, and having first sworn said witnesses to speak the
truth, the whole truth, and nothing but the truth, the said _____

doth depose and say as follows:

My name is Mamie B. Lambert. I am over twenty-one years of age and a resident of Bay Minette, Baldwin County, Alabama, where I have resided all my life. George M. Lambert and I were married at Brewton, in Escambia County, Alabama, on to-wit, July 31st, 1922, and lived together as husband and wife until on to-wit, October 15th, 1935. On and prior to October 15th, 1935, the Respondent threatened, abused and mistreated me. This condition grew worse from time to time, until I found that we could no longer live together as man and wife. His conduct was such that I had every reasonable apprehension to believe, and did actually believe that if I should continue to live with him, he would carry out his threats and do actual violence to my person, which would endanger my life and health. We tried to get along and live together as husband and wife, but it was impossible.

Mamie B Lambert

EDNA HERRON, a witness for the Complainant, being first duly sworn, deposes and says:

My name is Edna Herron. I live at Bay Minette, in Baldwin County, Alabama. I am personally acquainted with Mamie B. Lambert and George M. Lambert, both of Bay Minette, Alabama. I have known them for the past five or six years or more. They have not lived together as husband and wife since October 15, 1935. The conduct of the Respondent, George M. Lambert, was such that it was impossible for him and Mamie B. Lambert to live together as husband and wife. I have been around with them quite a bit and the Respondent was quarrelsome and very fussy toward the Complainant.

MAMIE B. LAMBERT,
Complainant,
VS.
GEORGE M. LAMBERT,
Respondent.

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

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, IN EQUITY:

Comes your Complainant, MAMIE B. LAMBERT, and humbly
complaining against the Respondent, GEORGE M. LAMBERT, respect-
fully represents and shows unto your Honor and this Honorable
Court as follows:

FIRST:

That both your Complainant and the Respondent are
bona fide residents of Baldwin County, Alabama, over twenty-
one years of age.

SECOND:

That the Complainant and the Respondent were married
at Brewton, in Escambia County, Alabama, on to-wit, July 31st,
1922, and lived together as husband and wife in Bay Minette,
Baldwin County, Alabama, until on to-wit, October 15th, 1935.

THIRD:

That on to-wit, October 15th, 1935, and various dates
prior thereto, the Respondent threatened, abused and mistreated
the Complainant; that his conduct was such that the Complainant
had every reasonable apprehension to believe, and she did actual-
ly believe, that the Respondent would carry out his threats and
do actual violence to her person, which would necessarily endanger
her life and health should she continue to live with him.

WHEREFORE, the premises considered, Complainant prays
that your Honor will, by proper process, make the said GEORGE

M. LAMBERT party respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF:

Complainant further prays that upon a final hearing of this cause your Honor will make and enter an order and decree forever barring the bonds of matrimony existing between her and the Respondent, GEORGE M. LAMBERT, and that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Marie B Lambert
Complainant.

Beale Hase
Solicitors for Complainant.

FOOT NOTE:

The Respondent, GEORGE M. LAMBERT, is required to answer each and every allegation contained in the foregoing bill of complaint, in paragraphs First to Third, inclusive, but not under oath, oath being hereby expressly waived.

Marie B Lambert
Complainant.

Beale Hase
Solicitors for Complainant.

MAMIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Comes the Respondent in his own proper person and waives notice of the taking of testimony on behalf of the Complainant; the right to cross-examine witnesses for the Complainant, and agrees that this matter be submitted for final decree forthwith, without further notice.

George M. Lambert
Respondent.

WITNESS:

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon GEORGE M. LAMBERT

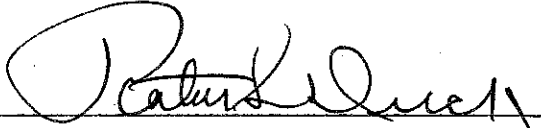
of BALDWIN County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

MAMIE B. LAMBERT

against said GEORGE M. LAMBERT

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 10th day of March 1936



Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

RECORDED

MAMIE B. LAMBERT,
Complainant,
VS.
GEORGE M. LAMBERT,
Respondent.

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

Comes the Respondent and for answer to the Complainant's Bill of Complaint and to each count thereof, separately and severally, says:

ONE:

That he admits the allegations contained in paragraphs First and Second.

TWO:

That he denies the allegation contained in paragraph Third and demands strict proof of the same.

George M. Lambert
Respondent.

WITNESSES:

RECORDED
Snick
6-321

ANSWER:

MAMIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed Mar. 16, 1936
Robert S. Snick,
Register

12

RECORDED
Sub 6
6-321

Serve on GEORGE M. LAMBERT

Circuit Court of Baldwin County
IN EQUITY

No. 203

SUMMONS

XXXXXXXXXXXXXXXXXXXX

MAMIE B. LAMBERT,

Complainant,

vs.

GEORGE M. LAMBERT,

Respondent.

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this 10

day of March, 1936

Mark Williams

SHERIFF

Executed this 11th day of

March 1936

by leaving a copy of the within Summons with

George M Lambert

Defendant

Mark Williams

Sheriff

By *Lemuel Brown*

Deputy Sheriff

FERRE & HALL,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED
Duck
6-322

WALVER:

MAIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed Mar. 16, 1936

Robert S. Duck, Jr.

Register

RECORDED
Duck
6-32-1

BILL OF COMPLAINT.

MAMIE B. LAMBERT,
Complainant,
VS.
GEORGE M. LAMBERT,
Respondent.

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

Filed this 10th day Mar. 1936
Robert S. Duck
Clerk-Register

William W Hobbs.

vs.

Francis G Hobbs.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
and Testimony of William W Hobbs. J C Marshall. And E Riggins.

and in behalf of Defendant upon

Robert S. Duck
Register.

THE FAIRHOPE COURIER

ERNEST B. GASTON, EDITOR AND PUBLISHER

A PROGRESSIVE PAPER FOR PROGRESSIVE PEOPLE

ESTABLISHED 1894

FAIRHOPE, ALABAMA

Notice to Non-Resident

STATE OF ALABAMA,
BALDWIN COUNTY.

In The Circuit Court, in Equity,
This the 5th day of March 1936,
William W. Hobbs, Complainant, vs.
Frances G. Hobbs, Respondent, No.
202.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Orvis M. Brown that the Respondent, Frances G. Hobbs, is a non-resident of the State of Alabama, residing when last heard of at Pensacola, Florida, and further that in the belief of said affiant, the Respondent is over the age of 21 years; it is, therefore, ordered that publication be made in the Fairhope Courier, a newspaper published in Fairhope, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Frances G. Hobbs, the said respondent, to answer or demur to the Bill of Complaint in this cause by the 5th day of April, 1936 or after thirty days therefrom a decree Pro Confesso may be taken against her.

Robert S. Duck,
Register in Chancery

Orvis M. Brown, Solicitor

Robertsdale, Ala.

For Complainant

32-4t

This is to certify that the attached legal notice appeared in the following issues of the Fairhope Courier:
March 12, 19, 26 and April 2.

E B Gaston
Editor and Publisher
Fairhope Courier.

Sworn to and subscribed before me this 12th. day of May 1936.

E E Perkins

RECORDED

check

6-379

No. 202

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

William W Hobbs.

VS.

Francis G Hobbs.

NOTE OF TESTIMONY

Filed in Open Court this 21st

day of May 1936

Robert S. Duck

REGISTER

THE STATE OF ALABAMA, } CIRCUIT COURT, IN EQUITY.

Baldwin County. }

No. 202 Spring, Term, 1936

Williaw W Hobbs. , Complainant..

Vs.

Francis G Hobbs. Defendant..

Motion is hereby made for a Decree Pro Confesso against Francis G Hobbs. Defendant..

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 18th day of May 1936

Orvis M Brown.

Solicitor.

RECORDED

Duck
6-379

No. 202

Page

State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

William W Hobbs.

Complainant

Vs.

Francis G Hobbs.

Defendant

Motion for Decree Pro Confesso
On Publication.

Filed May 18th, 1936

Robert Duck
Register.

Recorded in Record,

Vol. Page

Register.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 202..... Spring..... Term, 19236

WILLIAM G HOBBS....., Complainant...

vs.

FRANCIS G HOBBS....., Defendant...

To ROBERT S. DUCK....., Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by ~~FRANCIS G HOBBS~~.....

ORVIS M. BROWN..... Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

ORVIS M BROWN.....
Solicitor for Complainant.

No. 202.

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

WILLIAM W HOBBS.

vs.

FRANCIS G HOBBS.

REQUEST FOR DECREE IN
VACATION

FILED May 21st 1923

Rather S. Welch
Register

RECORDED IN RECORD

VOL. PAGE

Register

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. _____ Term, ~~1935~~ 1936

Marie B. Lambert _____, Complainant...

vs.

George M. Lambert _____, Defendant...

To Robert S. Duck _____, Register :

In the above stated cause a ^{Answer & Waiver} ~~Decree Pro Confesso~~ ^{filed by} having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Beebe & Hall _____

_____ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Beebe & Hall

.....
Solicitor for Complainant.

RECORDED

Duck
6-322

No.

Page

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Mamie B. Lambert

VS.

George M. Lambert

REQUEST FOR DECREE IN
VACATION

FILED

Mar. 16

192*1*

Robert S. Duck

Register

7

RECORDED IN RECORD

VOL. PAGE

Register

MAMIE B. LAMBERT

VS.

GEORGE M. LAMBERT

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
Testimony of Mamie B. Lambert and Edna Herron.

and in behalf of Defendant upon ~~answer and waiver~~

Robert S. Duck
Register.

RECORDED

Duck

6-322

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

MAMIE B. LAMBERT

VS.

GEORGE M. LAMBERT

NOTE OF TESTIMONY

Filed in Open Court this 16th

day of March 1936

Robert S. Duck,

REGISTER

7.