

763

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY;

Comes your Complainant Lawrence Joiner and humbly complaining against Fronie Joiner respectfully represents and shows unto your Honor as follows;

FIRST

That both are bona fide residents of Baldwin County, Alabama and have been for more than ten years next preceding the filing of the Bill of complaint in this cause; that both are over the age of twenty one years.

SECOND

That your complainant and respondent are husband and wife, having inter-married at Pensacola, Florida on the 15th day of April, 1918; that they lived together as man and wife until June 4th., 1928.

THIRD.

That on to-wit, about the first day of June, 1928, and on various other dates, the respondent Fronie Joiner committed acts of adultery with one Jim Jay; that the said acts were committed in Baldwin County, Alabama and without the consent or approval of the complainant; that the said complainant did not know of the said acts of adultery of the respondent until the 4th day of June, 1928; that he did not consent, to, approve of or connive at said acts of adultery committed by the said respondent.

FOURTH;

That there was born to said marriage four children, namely, Jesse Willard Joiner, a boy, nine years of age; Lawrence Everett Joiner, a boy, seven years of age, William Shirley Joiner, a boy four years of age and Marvin Earl Joiner, a boy two years of age; that respondent, on account of said acts of adultery, is not a fit and proper person to have the custody and control of said children; that your complainant is a fit and proper person to have the custody and control of said children.

Wherefore your Complainant prays that your Honor will, by the proper process, make the said Fronie Joiner, party respondent to this bill of complaint, requiring her to appear, plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this honorable court.

Complainant further prays that upon the final hearing of this cause, your Honor will grant unto him a decree of absolute divorce forever barring the bonds of matrimony existing between him and the said Fronie Joiner; and that your Honor will enter an order granting unto your complainant Lawrence Joiner, the custody and control of the said children, namely, Jesse Willard Joiner, Lawrence Everett Joiner, William Shirley Joiner and Marvin Earl Joiner; that your Honor will give and grant unto your complainant such other, further, different or general relief as in equity and good conscience may seem meet and proper and as in duty bound, he will forever pray.

Lawrence Joiner
Complainant

Grabe D. Hall
Solicitors for Complainant

FOOT NOTE:-

The respondent is required to answer each and every paragraph of the foregoing bill of complaint, numbered first to fourth, both inclusive, but not under oath, answer under oath being hereby expressly waived.

Lawrence Joiner
Grabe D. Hall
Solicitors for Complainant

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

Lewis Jones
vs.
Francis Jones

No.

vs.

PLAINTIFF

DEFENDANT

Bill of Costs

| FEES OF REGISTER | | Dollars | Cts. | | | |
|--|-------|---------|-------|---|---------|-------|
| Filing each bill and other papers..... | \$ 10 | | 70 | Brought Forward..... | | 10 80 |
| Issuing each subpoena..... | 50 | | 50 | For receiving, keeping and paying out or distribut- | | |
| Issuing each copy thereof..... | 40 | | 40 | ing money, etc.: 1st \$1,000, 1 per ct.; all | | |
| Entering each return thereof..... | 15 | | 15 | over \$1,000, and not over \$5,000, 3/4 of 1 per | | |
| For each order of publication..... | 1 00 | | | ct.; all over \$5,000, and not exceeding | | |
| Issuing writ of injunction..... | 1 50 | | | \$10,000, 1/2 of 1 per ct.; all over \$10,000, 1/4 of | | |
| For each copy thereof..... | 50 | | | 1 per ct., | | |
| Entering each return thereof..... | 15 | | | Receiving, keeping and paying out money paid into | | |
| Issuing writ of attachment..... | 1 00 | | | court; etc., 1/2 of 1 per ct. of amount received, | | |
| Entering each return thereof..... | 15 | | | Each notice sent by mail to creditors..... | 15 | |
| Docketing each case..... | 1 00 | 1 | 00 | Filing, receipting for and docketing each claim, etc | 25 | |
| Entering each appearance..... | 25 | | | For all entries on subpoena docket, etc..... | 50 | 50 |
| Issuing each decree pro confesso on persl ser..... | 1 00 | | | For all entries on commission docket, etc..... | 50 | |
| Issuing each decree pro confesso on publication..... | 1 00 | | | Making final record, per 100 words..... | 15 | 2 65 |
| Each order appointing guardian..... | 1 00 | | | Certified copy of decree..... | 1 00 | 1 00 |
| Any other order by Register..... | 50 | | | Report of divorce to State Health office..... | 50 | 50 |
| Issuing commission to take testimony..... | 50 | | | (Acts 1915) | | |
| Receiving and filing..... | 10 | | | Total Fees of Register | | 15 85 |
| Endorsing each package..... | 10 | | | | | |
| Entering order submitting cause..... | 50 | | 50 | | | |
| Entering any other order of court..... | 25 | | | FEES OF SHERIFF. | | |
| Noting all testimony..... | 50 | | 50 | Serving and returning subpoena on deft..... | \$ 1 50 | |
| Abstract of cause, etc..... | 1 00 | | 1 00 | Serving and returning subpoena for witness..... | 65 | |
| Entering each decree..... | 75 | | 75 | Levying attachment..... | 1 50 | |
| For every 100 words over 500..... | 15 | | 15 | Entering and returning same..... | 25 | |
| Taking account, etc..... | 3 00 | | | Selling property attached..... | | |
| Taking testimony, etc..... | 15 | | | Impanelling jury..... | 75 | |
| Each report, 500 words or less..... | 2 50 | | 5 00 | Executing writ of possession..... | 2 50 | |
| For every 100 words over 500..... | 15 | | | Collecting execution for costs..... | 1 50 | |
| Amount claimed less than \$500, etc..... | 2 00 | | | Serving and returning sci. fa., each..... | 65 | |
| Issuing each subpoena..... | 25 | | | Serving and returning notice..... | 65 | |
| Witness certificate, each..... | 25 | | | Serving and returning writ of injunction..... | 1 50 | |
| Issuing execution, each..... | 75 | | | Serving and returning writ of exeat..... | 1 50 | |
| Entering each return..... | 15 | | | Taking and approving bonds, each..... | 75 | |
| Taking and approving bond, each..... | 1 00 | | | Collecting money on execution..... | | |
| Making copy of bill, etc..... | 15 | | | Making deed..... | 2 50 | |
| Each notice not otherwise provided for..... | 50 | | | Serving and returning application, etc..... | 1 00 | |
| Each certificate or affidavit, with seal..... | 50 | | | Serving attachment, contempt of court..... | 1 50 | |
| Each certificate or affidavit, no seal..... | 25 | | | Total Fees of Sheriff | | |
| Hearing and passing on application, etc..... | 3 00 | | | | | |
| Each settlement with receiver, etc..... | 3 00 | | | RECAPITULATION. | | |
| Examining each voucher of receiver, etc..... | 10 | | | Register's Fees..... | | 10 85 |
| Examining each answer, etc..... | 3 00 | | | Sheriff's Fees..... | | 1 50 |
| Recording resignation, etc..... | 75 | | | Commissioner's Fees..... | | |
| Entering each certificate to Supreme Court..... | 50 | | | Solicitor's Fees..... | | |
| Taking questions and answers, etc..... | 25 | | | Witness Fees..... | | |
| For all other service relating to such proceedings.. | 1 00 | | | Guardian Ad Litem..... | | |
| For services in proceeding to relieve minors, etc., | | | | Printer's Fees..... | | |
| same fees as in similar cases. | | | | Trial Tax..... | 3 00 | 3 00 |
| Commission on sales, etc.: 1st \$100, 2 per cent.; | | | | Recording Decree in Probate Court..... | | |
| all over \$100, and not exceeding \$1,000, 1 1/2 | | | | Total | | 19 65 |
| 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..... | | | 10 80 | | | |

Received payment this _____ day of _____ 192_____

Register.

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

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Fronie Joiner

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

Lawrence ~~Bill~~ Joiner

against said Fronie Joiner

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, T. W. Richerson, Register of said Circuit Court, this 5th day of June 1928.

T. W. Richerson Register

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

State of Alabama,
Baldwin County

Circuit Court In Equity.

Lawrence Joiner vs Fromie Joiner.

Comes the defendant in the above styled cause and
denies each and every allegation contained in the Bill of
Complaint and demands strict proof thereof.

June 5th, 1928.

Fromie Joiner

Witnesses:

T. P. [unclear]

W. P. [unclear]

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 Belle Nettles

of GulfportMiss ~~State~~ 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

State of Alabama

against said

~~Belle Nettles~~

Belle Nettles,

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, T. W. Richerson, Register of said Circuit Court, this 29th day of February 1928

T. W. Richerson Register.

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

Original

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

vs.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

*Copy of Summons ✓
Copy of bill
sent by Reg mail
3/1-1928 to Billie
Keller Grefford*

Approved

SERVE ON _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

Lawrence Joiner

vs.

Fronie Joiner.

Hall & Beebe

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA.
BALDWIN COUNTY

Received in office this _____
day of _____ 192

Sheriff.

Executed this *5th* day of
June 192*8*

by leaving a copy of the within Summons with

Fronie Joiner

Defendant.

Lo Arum

Sheriff.

By *B. O. Wiggins*

Deputy Sheriff.

100 Wignall Hill

Lawrence James
vs

Finney Jones

Filed June 25/928

J. W. Keenan
Registrar