

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

No. 213

Humphries

VS.

PLAINTIFF

Humphries

DEFENDANT

BILL OF COSTS

Fees of Register	Dollars	Cts.	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 cent of amount received.		
Issuing each copy thereof.....		40	Each Notice Sent by Mail to creditors.....	15	
Entering each return thereof.....		15	Filing, Receiving 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 hundred words.....	15	
Entering each return thereof.....		15	Certified Copy of Decree <i>of Contempt</i>	1-00	9. 2
Issuing Writ of Attachment.....	1	00	Report of Divorce to State Health Office.....	50	
Entering each return thereof.....		15	Acts 1915		
Docketing each case.....	1	00	Total Fees of Register.....		2 00
Entering each Appearance.....		25			
Issuing each Decree Pro Confesso on personal service..	1	00	Fees of Sheriff		
Issuing each Decree Pro Confesso on publication.....	1	00	Serving and Returning Subpoena on Deft.....	\$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	
Receiving and Filing.....		10	Selling Property Attached.....		
Endorsing each package.....		10	Impanelling 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.....		
Each Report, 500 words or less.....	2	50	Making Deed.....	2 50	
For every 100 words over 500.....		15	Serving and Returning Application.....	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		
Witness Certificate, each.....		25	Recapitulation		
Issuing Execution, each.....		75	Register's Fees.....		
Entering each return.....		15	Sheriff's Fees.....		
Taking and Approving Bond, each.....	1	00	Commissioner's Fees.....		
Making copy of bill, etc.....		15	Solicitor's Fees.....		
Each notice not otherwise provided for.....		50	Witness Fees.....		
Each certificate or affidavit, with seal.....		50	Guardian Ad Litem.....		
Each certificate or affidavit, no seal.....		25	Printer's Fees.....		
Hearing and passing on application, etc.....	3	00	Trial Tax.....	3 00	
Each settlement with receiver, etc.....	3	00	Recording Decree in Probate Court.....		
Examining each voucher of receiver, etc.....		10	Total.....		
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 service in proceeding to relieve minors, etc same fee 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 May 1936

R. E. D. ...

Register.

213

Veola Humphreys,
Complainant,

vs

Clarence Humphreys,
Respondent.

No. _____
IN THE CIRCUIT COURT OF BALDWIN CO., ALA.
IN EQUITY.

To the Honorable F. W. Hare, as Judge of the Twenty First Judicial
Circuit of Alabama:-

Comes Veola Humphreys, and brings this her bill of complaint
against Clarence Humphreys, and shows unto this Honorable Court:

1 - That during the times of the happenings of all the matters
and things in this bill of complaint averred, the respondent and
complainant each resided in the State of Alabama; that complainant
is over the age of eighteen years and is a bona fide resident of
Baldwin County, Alabama, and that the respondent is over the age
of twenty one years, and resides in Cullman County, Alabama;

2 - That complainant and respondent were lawfully married to one
another at Cullman, Alabama, on or about May 27, 1933, and lived
together as husband and wife until on or about May 21, 1935, when
the respondent, by his cruelty and inhuman conduct towards the
complainant, forced her to leave him and ever since then she
has lived separate and apart from him, and has during all of said
time had the possession of Betty Jean, the child of the marriage,
and has by her own efforts and from her own means supported the
said child; that after the said marriage the respondent, without
fault on the part of the complainant, has frequently committed
actual violence on the person of the complainant, attended with
danger to her life or health, and from his conduct there is
reasonable apprehension that he will commit actual violence on
the person of the complainant, attended with danger to her life or
health; that on one of said occasions, the respondent, while the
complainant was carrying in her womb a child of the said marriage,
so violently beat the said complainant, in anger, as to cause her
to lose the said child; that after the said marriage and before the
separation, the respondent very frequently came home drunk and
would severely beat the complainant in anger; that frequently on
Saturday nights the respondent, after getting through his work,
and after getting his pay check, would stay out until the small

hours of the morning, and on the Saturday night preceeding the Thursday on which the complainant was forced from home as above alleged, the respondent came home about two o'clock in the early morning, under the influence of liquir, and stated to complainant that he had that night committed adultery, whereupon the complainant stated to respondent that she was going to leave him, and the respondent laughed in the face of the complainant and asked her where in the hell she was going to go to, as complainant didnt have anywhere to go; That complainant has not condoned any of said cruelty;

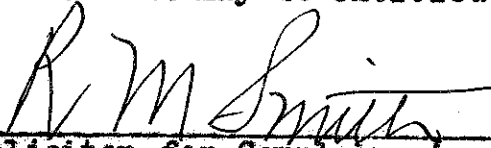
3 - And complainant avers that there was born of the said marriage one child; that she is two years of age, and her name is Betty Jean Humphreys; that said child is in the possession of the complainant; that the respondent has frequently stated to the complainant that he did not care for either the complainant or the said child;

4 - And complainant avers that she owns no property; that she is a hard worker, and by her own labors have earned a living for herself and the said child ever since the said separation; that it is for the best interests of the said child that she, the complainant, have the permanent care and custody of the said child; that the respondent is a man of dissipated habits, though he is a man of good health and is capable of earning a living for himself and to pay the alimony and support and solicitor's fees herein prayed for; that in the bringing and prosecution of this suit, the complainant has been forced to employ a solicitor to represent her interests.

PRAYER FOR PROCESS AND FOR RELIEF:

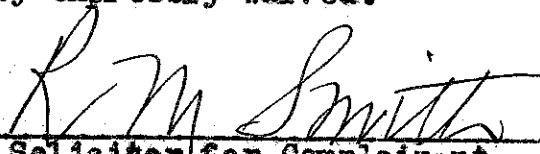
Complainant therefore prays that this Honorable Court will take jurisdiction of this cause, and will make the said Clarence Humphreys a party respondent, and will cause the process of this Court to issue and be served upon the said respondent, requiring him to appear and answer this bill of complaint within the time required by law; that this Court will cause a reference to be had before the

Honorable Register of this Court, for the purpose of ascertaining a reasonable solicitor's fee to be paid by respondent to the solicitor for the complainant, and what is a reasonable alimony pendente lite for complainant and maintenance for the said child pendente lite; that a decree will be made requiring the respondent to forthwith pay to the complainant said solicitor's fee and to pay said alimony pendente lite and said maintenance; that upon the final hearing of this cause, a decree will be rendered, dissolving the bonds of matrimony, and granting to this complainant the custody of said child, and reasonable alimony for herself and support and maintenance of said child, and granting to this complainant such other and further relief as she may be entitled to.



 Solicitor for Complainant.

Foot-Note: The respondent is required to answer, but not under oath, each allegation of the foregoing bill of complaint from paragraph numbered 1 - to paragraph numbered 4 - , both inclusive, but oath as to such answers is hereby expressly waived.



 Solicitor for Complainant.

VEOLA HUMPHREYS

COMPLAINANT

VS

CLARENCE HUMPHREYS

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 213.

Comes the defendant, Clarence Humphreys, and files this his demurrers to the Bill of Complaint in the above styled cause and for grounds assigns the following:

I

That it is not alleged with sufficient certainty the time of the alleged cruel or inhuman acts, charged in the bill were committed.

II

That the bill fails to state with what cruel or inhuman acts the complainant is charging the defendant with.

III

That it is impossible to tell from the bill of complaint whether the complainant is charging the defendant with cruelty or adultery.

IV

That paragraph two of the bill of complaint charges the defendant with cruelty and adultery and complainant should be required to elect the grounds on which she is to proceed with her divorce.

V

It is not alleged in what county the cruelty charged in the bill of complaint was committed.

VI

That the Circuit Court of Baldwin County does not have jurisdiction of this cause.

VII

It is not alleged that the complainant has been a bona fide resident citizen of Baldwin County for the time required by law.

VIII

That said bill of complaint charges the defendant with several grounds for divorce and the bill fails to inform the defendant with what charge he is required to defend.

IX

That the bill does not allege that the complainant is a fit and proper person to have the care, custody and control of the said minor child, Betty Jean Humphreys.

X

It is not alleged that the cruelty charged in the bill was committed in Baldwin County, Alabama.

W. W. Finney
Attorney for Respondent

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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 CLARENCE HUMPHREYS

of CULLMAN 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

VEOLA HUMPHREYS

against said CLARENCE HUMPHREYS

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 4th day of April 1936

Robert S. Duck Register

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

RECORDED
INDEXED
6-3-76

Filed this 4 day Apr 10 36
Robert A. Buck
Clerk-Register

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RECORDED
Renumerated
6-414

Stumpbeegs.

U.S.

Stumpbeegs.

Filed June 23, 1914
Robert Andrews



RECORDED
INDEXED
6-376

Serve on CLARENCE HUMPHREYS

**Circuit Court of Baldwin County
IN EQUITY**

No. 213

S U M M O N

VEOLA HUMPHREYS,

Complainant,

vs.

CLARENCE HUMPHREYS,

Respondent.

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this 16 day of

May 1934

by leaving a copy of the within Summons with

Clarence Humphreys

Defendant

J. E. Peine
Sheriff

By _____
Deputy Sheriff

R. M. SMITH
Solicitor for Complainant

Recorded in Vol. _____ Page _____