

Cape

STATE OF ALABAMA }
COUNTY OF BALDWIN } IN THE CIRCUIT COURT OF SAID COUNTY, IN EQUITY.
No. _____

TO THE HONORABLE F.W.HARE, JUDGE OF SAID COURT:

AGNES HARRELL, nee BEDGOD,)
Oratrix,)
vs) BILL OF COMPLAINT FOR DIVORCE AND
Grady Harrell,) ALIMONY
Respondent.)

HUMBLY complaining your oratrix, Agnes Harrell, brings this her bill of complaint against Grady Harrell, as respondent, and respectively shows:

FIRST

That the oratrix is a bona fide resident of the County of Baldwin and State of Alabama and lives at or near Summerdale, Alabama and has been resident of said County and State for Five years next preceding filing of this Bill of Complaint.

SECOND

That your oratrix and the respondent were married in the State of Florida June 18, 1928 and lived together about four (4) years when the respondent got into trouble and was incarcerated in the Penitentiary of the State of Florida for about the period of three (3) years. That she lived with her father in or near Summerdale Alabama during the most of the time since her marriage and that she is now living in or near the town of Summerdale Alabama and making her own living. And that the respondent herein is a man who moves from place to place and has no permanent home. And your oratrix now lives near or stays with a Mrs. D.R. Wilson, an old and trusted friend, near Summerdale Alabama.

THIRD

At two or three ^{weeks} ~~months~~ ago the respondent was released from the Penitentiary of the State of Florida and that he came to Summerdale, Alabama and that he stays around where he annoys your oratrix. At various times since his release he has appeared around Summerdale, Alabama and he has made threats and has at times exhibited a revolver wherein he threatened to shoot your oratrix and that he on every occasion that presents itself and that on occasions where he attempts to play bad he exhibits an ungovernable temper and by his acts and conduct your oratrix is led to believe and does believe that her life is in danger and that on numerous and many occasions he has threatened to take the life of your oratrix and on various occasions has attempted and did use force and that he has accused your oratrix of being an unfaithful woman and that he is extremely jealous and vicious character and that your oratrix has led a virtuous and upright life throughout her marriage to the respondent and has kept her marriage vows. That all the time since the respondent has been incarcerated in the Penitentiary of the State of Florida and since that time that your oratrix has provided for her own maintainence and that of her two children herein~~af~~ after named EDNA PEARL and LENA ADELE and that the respondent has stated to your oratrix that he intended to take her life.

FOURTH

Your oratrix further shows that of the said marriage between your said oratrix and said respondent that two children were born namely EDNA PEARL ^{Harrell} ~~aged Four~~ and LENA ADELE ^{Harrell} ~~aged Two~~. Your oratrix further shows to your Honorable Court that the Respondent threatens to take away away the two children and that they are of tender years and that they need their mothers love and affection. That she has cared for, loved and protected them.

That she now has them in her custody and that she is the proper person to have the care of the children and your oratrix further avers that the welfare of the children demands that they be kept and remain with their mother.

FIFTH

Your oratrix further avers that the respondent is an able-bodied man and is capable of making a living and help to provide for their children and that he has some forty acres of land in the State of Florida and that he has an automobile and that he is able to help maintain and support their children. That your oratrix has no means even to employ counsel in this cause and that she avers that because of the matters and things heretofore alleged that she has a right to alimony pendenti lite and permanent alimony and to solicitors fees representing her in this cause.

SIXTH

Your oratrix shows this Honorable Court that she is the proper person to have the custody of the children above named and she does ask of this Honorable Court to grant and to give to her the sole care and custody of the above named children and that she be permitted to keep them until they arrive at the years of maturity.

SEVENTH

Your oratrix further shows to this Court that because of the cruel and inhuman conduct exhibited by the respondent toward your oratrix that she asks that your Honor grant to her an absolute divorce from the respondent and that ties of matrimony binding them together be dissolved and she be permitted to have an absolute divorce from said respondent.

PRAYER FOR PROCESS

Wherefore premises considered your oratrix prays that your Honor will take jurisdiction made by this Bill of Complaint and that Proper Process is issued to him from this Court and that the said GRADY HARRELL be made a party respondent thereto. That GRADY HARRELL be made a respondent thereto and be required to answer charges made against him and that in all things required by the rules and practices of this Court. Your oratrix further prays that your Honor will grant to her a reference to ascertain what would be a reasonable alimony for her support pendenti lite and a reasonable sum to be paid to her solicitor in this cause for representing her, your oratrix, in this cause and will enter an order requiring the respondent to pay the same.

PRAYER FOR RELIEF

Oratrix further prays that you will grant to her an absolute divorce, the care and the custody of the aforesaid minor children and will enter an order requiring the respondent by such means and such manner as your Honor will seem meet and proper. Oratrix further prays that on upon the hearing of said cause that she be granted an absolute divorce and the care and custody of the minor children and that your Honor will order, adjudge and decree that the respondent be required to pay to your oratrix permanent alimony for the support of herself and children may under all the circumstances and conditions be proper. Your oratrix also prays for such other, further and different relief as in equity and good conscience may be due her in the premises.

F. F. Nelson
Prayer for Relief

Grady Harrell
Defendant

FOOTNOTE:

That the respondent is required to answer each and every allegation and paragraph in the foregoing complaint and that his oath thereto is hereby expressly waived.

F. F. Nelson
Plaintiff for Cause

F. F. NELSON
ATTORNEY-AT-LAW
ROBERTSDALE, ALABAMA

August 19, 1930

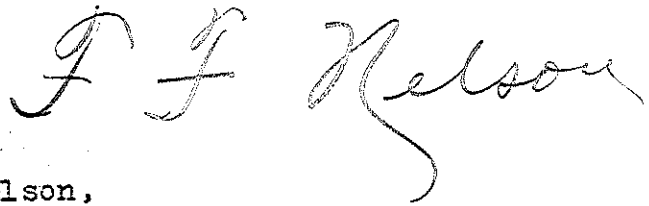
Mr. T.W. Richerson, Clerk,
Bay Minette, Alabama

Dear Tom:

I am herewith enclosing a Bill of Complaint for a
Divorce wherein Agnes Harrell is Oratrix and Grady Harrell is
the respondent.

Please have service gotten on this Respondent as soon
as possible. We understand that he will be found at one, Mrs.
Lloyd at about 6:30 P.M. on week days.

Yours very truly,



F.F. Nelson,

FFN/rl

Attorney-at-Law

STATE OF ALABAMA }
COUNTY OF BALDWIN } IN THE CIRCUIT COURT OF SAID COUNTY, IN EQUITY.
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J. F. Nelson
Attorney for Oratrix

Agnes Harrell
Oratrix

FOOTNOTE:

That the respondent is required to answer each and every allegation and paragraph in the foregoing complaint and that his oath thereto is hereby expressly waived.

J. F. Nelson
Attorney for Respondent

J.R. all
STATE OF ALABAMA

COUNTY OF BALDWIN

IN THE CIRCUIT COURT OF
SAID COUNTY AND STATE

IN EQUITY NO. _____

AGNES HARRELL
OBATRIX

VS

GRADY HARRELL,
RESPONDENT

BILL OF COMPLAINT

F.F. NELSON,
ATTORNEY

Filed Aug 20th/1930
T. W. Higginson
Register

Summons and given
Shreff. 8/21-30

RECORDED

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

Agnes Harrell,

No. 912.

vs.

Grady Harrell,

The State of Alabama,

Baldwin County.

Circuit Court, in Equity.

This the 10th day of

November, 1930

In this cause it being made to appear to the Clerk of this Court by the affidavit of
F.F. Nelson, Atty for Complainant,

that the Defendant Grady Harrell,

is a non-resident of the State of Alabama and his last known address was Pensacola,
Fla.,

and further, that, in the belief of said Affiant... the Defendant is over the age of 21
years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper publish-
ed in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

the said Grady Harrell,

to answer or demur to the Bill of Complaint in this cause by the 13th day of
December, 1930, or after thirty days therefrom a decree Pro Confesso may be
taken against the said Grady Harrell;

Hon. F.F. Nelson
Atty for Complainant.

T.W. Pickens
Register.

AFFIDAVIT OF NON-RESIDENT.

Moore Printing Co., Bay Minette, Ala.

The State of Alabama, {
Baldwin County

In Circuit Court, in Equity

Agnes Hance
vs.

Grady Hance

Before me, T. W. Richerson, Register of the Circuit Court of Baldwin County, Ala., personally appeared F. F. Nelson

known to me, who being duly sworn deposes and says that

Grady Hance

is a non-resident of the State of Alabama, and that his last known address was

Pensacola Florida,

That said Grady Hance (Defendant)

is over the age of twenty-one years.

Sworn to and subscribed before me this

day of Nov. 10, 1930

F. F. Nelson

att'y for Plaintiff

T. W. Richerson
Register Circuit Court, Baldwin
County, Ala.

STATE OF ALABAMA

County

Affidavit of Non-Resident

IN CIRCUIT COURT
IN EQUITY

Filed Nov 10 1930
T. W. Williams
Chas. H. ...

Register Circuit Court, Baldwin
County, Ala.

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

Agnes Harrell,

No.

No. 912.

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Hon. F. F. Nelson
Atty for Complainant.

T. W. Hickman
Register.

CHANCERY EXECUTION
BILL OF COSTS

No. 912

Vs.

Plaintiff

Defendant

FEES OF REGISTER		Dollars	Cents	Brought Forward	\$	
Filing each bill and other papers	\$ 10	30		For Receiving, keeping and paying out or distributing money, etc.: 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	3	20
Issuing each subpoena	50	50		Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.		
Issuing each copy thereof	40			Each notice sent by mail to creditor ..	15	
Entering each return thereof	15	100		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	1 00
Entering each return thereof	15	100		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	4	20
Docketing each case	1 00			FEES OF SHERIFF		
Entering each appearance	25			Serving and returning subpoena on deft. \$1 50		1 50
Issuing each decree pro confesso on per. ser. 1 00				Serving and returning subpoena for witness	65	
Issuing each decree pro confesso on publica. 1 00				Levying attachment	3 00	
Each order appointing guardian	1 00			Entering and returning same	25	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	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	15		Serving and returning writ of exeat. 1 50		
Entering each decree	75	15		Taking and approving bonds, each	75	
For every 100 words over 500	15			Collecting money on execution	2 50	
Taking account, etc.	3 00			Making deed	1 00	
Taking testimony, etc.	15			Serving and returning application, etc. 1 50		
Each report, 500 words or less	2 50			Serving attachment, contempt of court 1 50		3 25
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	3 30	
Witness certificate, each	25			Sheriff's Fees	3 25	
Issuing execution, each	75			Commissioner's Fees		
Entering each return	15			Solicitor's Fees	90	
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	3 00	
Each certificate or affidavit, with seal .. 25				Trial Tax		
Each certificate or affidavit, no seal	25			Recording Decree in Probate Court ...		
Hearing and passing on application, etc. 3 00				Total	10	45
Each settlement with receiver, etc. 3 00						
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 ser relating to such proceedings 1 00						
For services in proceeding to relieve minors, etc.. same fee as in similar cases.						
Commission on sales, etc.: 1st \$100, 2 per ct.; 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		320				

The State of Alabama, {

No. 912

Baldwin County.

Circuit Court, In Equity

Aug Term, 1934

To Any Sheriff of the State of Alabama—GREETING:

You are hereby commanded, That of the goods and chattels, lands and tenements of

Agnes Harrell Plaintiff Defendant

you cause to be made the sum of Dismissed Dollars,

which Grady Harrell Deft Plaintiff

recovered of Him on the 22 day of Aug 1934

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of

Ten and 45/100 Dollars,

costs of suit, and have the same to render to the said F. A. Stone and make return of this Writ and the execution thereof, according to law.

Interest from 193 to date of collection.

Witness my hand, this 11 day of Sept 1934 F. A. Stone, Register.

No. 912

The State of Alabama,
Baldwin County.

Circuit Court, In Equity.

Harrell

vs.

Harrell

CHANCERY EXECUTION
Fi. Fa.

\$

Total - - - \$ 10.43

e Book 23 Page

ecution Docket 1 Page

J. J. Wilson

Complainant's Solicitor.

The State of Alabama,
Baldwin County.

ha duly waived right
to the exemption of personal property as to
the collection of the debt for which this execu-
tion is issued.

Register.

Received in office this

day of 193 ...

Sheriff

Execution Docket Page

MOORE PRINTING CO., BAY MINETTE, ALA.

The State of Alabama, {
Baldwin County.

By virtue of the within execution I have levied