

AVIS COOPER,
Complainant,

vs

REL COOPER,
Defendant.

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 and answer, waiver and agreement filed by the Defendant, and agreement between the Complainant and Defendant as to the alimony and attorneys fee, and the testimony as noted by the Register; and upon consideration thereof the Court is of the 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 the grounds of cruelty.

IT IS THEREFORE ORDERED that the said AVIS COOPER be and she is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

IT IS THEREFORE ORDERED, that the said REL COOPER pay the costs herein taxed, for which execution may issue.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the said AVIS COOPER shall not again marry except to the said REL COOPER until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said REL COOPER during the pendency of said appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said REL COOPER shall pay to the said AVIS COOPER, as maintenance for their minor child, the sum of ten dollars per month, such amount to be paid on the first of each month, subject to the further order of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said REL COOPER pay to Beebe & Hall, as Solicitors for the Complainant, the sum

of seventy-five dollars as attorneys fee.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said
AVIS COOPER be restored her former name, viz: Avis Northcutt.

This the 3rd day of February, 1931.

F. W. Hare

Judge of the Circuit Court of
Baldwin County, Alabama.

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

Comes your Complainant, Avis Cooper, and humbly complaining
against Rel Cooper, respectfully represents and shows unto your Honor
as follows:

FIRST:

That she is a bona fide resident of Baldwin County, Alabama,
and has been for more than three years next preceding the filing of
this bill of complaint; that she is eighteen years of age; that the
Defendant, Rel Cooper, is a resident of Baldwin County, Alabama, over
twenty-one years of age.

SECOND:

That your Complainant and the Defendant were married at
Lowley, in Baldwin County, Alabama, on September 28th., 1928.

THIRD:

That your Complainant and the Defendant lived together as
husband and wife in Baldwin County, Alabama, until on to-wit, August
7th., 1930.

FOURTH:

That on August 7th., 1930, the Defendant cursed and abused
your Complainant, and that on said date, August 7th., 1930, the
Defendant cursed and abused her and drove her away from his home and
she was forced to seek shelter with her parents; that the conduct of
the Defendant was such as to cause your Complainant to reasonably
apprehend that the Defendant would carry out his threats by doing
actual violence to her person which would endanger her life and health.

FIFTH:

That the Defendant is an able-bodied man, capable of earning
from seventy-five to one hundred dollars per month; that your Complainant
is in such physical condition, she at this time being pregnant
with a child by the Defendant, that she is unable to earn a livelihood

at this time and is wholly dependent on her parents; that she has no funds with which to employ counsel to prosecute this case for her.

Wherefore, the premises considered your Complainant prays that your Honor will, by proper process, make the said Rel Cooper party Defendant 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; that your Honor will order a reference to be held by the Register of this Court to ascertain and determine a reasonable amount to be paid to your Complainant by the said Defendant as alimony pendente lite and permanent and for her attorneys fees in this cause.

Your Complainant further prays that your Honor will, upon a final hearing of this cause, grant unto her an absolute divorce forever barring the bonds of matrimony existing between her and the Defendant Rel Cooper; that your Honor will enter an order and decree requiring the Defendant, Rel Cooper, to pay to your Complainant such a reasonable amount as your Honor shall deem fit as permanent alimony and attorneys fee; that your Honor will grant unto the Complainant such other, further, different and general relief as she may be in equity and good conscience entitled to receive and as in duty bound she will ever pray.

Beebe + Stace
ATTORNEYS FOR COMPLAINANT.

FOOT NOTE:

The Defendant is required to answer every allegation of the foregoing bill of complaint from first to fifth, inclusive, but not under oath. Oath being hereby expressly waived.

Beebe + Stace
ATTORNEYS FOR COMPLAINANT.

AVIS COOPER,
Complainant,

vs

REL COOPER,
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

And now come the Complainant and Respondent in the above styled cause, acting by and through their respective Solicitors of record, and hereby expressly agree:

That ten dollars per month is a reasonable amount to be paid to the Complainant by the Respondent as ~~permanent alimony~~ *for child*;

That seventy-five dollars is a reasonable attorneys fee to be paid by the Respondent to Beebe & Hall, Solicitors for the Complainant.

Beebe & Hall
SOLICITORS FOR COMPLAINANT.

Rel Cooper
SOLICITOR FOR DEFENDANT.

William F. Lee
Att for Respondent

Agreement of
Council

Filed Jan 26. 1931
T. W. Rice
Register

AVIS COOPER,
Complainant,

vs

REL COOPER,
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

And now comes the Respondent in the above styled cause, acting by and through his Solicitor of record, and expressly waives notice of the time of taking testimony on behalf of the Complainant; the right to cross examine the Complainant's witnesses, and consents that the matter be submitted for final decree upon the original bill of complaint filed by the Complainant, answer of Respondent, agreement with respect to alimony and attorneys fee, and proof as submitted by the Complainant.


SOLICITOR FOR DEFENDANT.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 930 Vacation Feb Term, 1921

Avis Cooper, Complainant.

vs.

Rel Cooper, Defendant.

To T.W. Richerson, 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 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
Solicitors for Complainant.

No. 930

Page

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Avis Cooper

VS.

Bel Cooper,

REQUEST FOR DECREE IN
VACATION

FILED February 3rd, 1921

W. R. [Signature]
Register

RECORDED IN RECORD

VOL. PAGE

Register

8581 NOTE OF TESTIMONY

Avis Cooper

vs.

Rel Cooper,

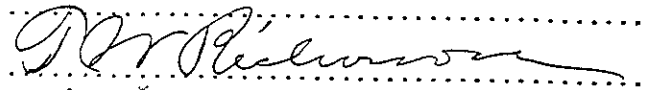
THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,.....
Service on Deft., agreement of Counsel and testimony of

Avis Cooper, Lennie Barker and A.F. Northcutt,

and in behalf of Defendant upon



Register.

No. 930

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Avis Cooper

VS

Bel Cooper,

NOTE OF TESTIMONY

Filed in Open Court this

3rd

day of

February

1921

W. R. [Signature]

Register

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 Rel Cooper

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

Avis Cooper

against said

Rel Cooper

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 2nd day of October 1930

~~1930~~

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

Avis Cooper

vs.

Rel Cooper

Beebe & Hall,

Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of

1938

Sheriff.

Executed this

day of

1938

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By

Deputy Sheriff.

RECORDED

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

..... **AVIS COOPER** Complainant.

VS.

..... **REL COOPER** Respondent.

I, **T. W. Richardson**

as Register and Commissioner

have called and caused to come before me **Avis Cooper, Lennie Barker and**

A. F. Northcutt.

Witnesses named in the Requirement for Oral Examination, on the **14th** day of **November**

1950, at the office of **T. W. Richardson**

in **Bay Minette, Baldwin Co, Alabama**, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said **Avis Cooper**

doth depose and say as follows:

My name is **Avis Cooper**. I am a resident of **Baldwin County, Alabama**, and have been for more than three years next preceding the filing of this bill of complaint. I am over eighteen years of age. The Respondent, **Rel Cooper**, is over twenty-one years of age and a resident of **Baldwin County, Alabama**. **Rel Cooper** and I were married at **Doxley, in Baldwin County, Alabama**, on or about **September 26, 1926**, and we lived together as man and wife in **Baldwin County, Alabama**, until on or about **August 7, 1950**; that on to-wit, **August 7, 1950**, he cursed, abused and threatened me and told me "To get my God-damn things and get to hell out from there and stay", he loaded my things on a truck and sent me and my things on the truck to my father's place. We were at **Rel Cooper's house** when he cursed, abused and drove me away. The Defendant had, on various occasions prior to the time I finally left him on to-wit, **August 7, 1950**, cursed and abused me, but each time we effected some reconciliation, however, his conduct from time to time became worse and on **August 7th**, I was finally forced to leave and advised never to come back. I was, at the time that he drove me away, on to-wit, **August 7th, 1950**, pregnant with a child by him. His conduct was such, I knowing him as I did, as to cause me to have every reasonable ground to

believe and apprehend that he would, should I remain with him, carry out his various threats and do actual violence to my person which would necessarily endanger my life and health.

The Defendant, Rel Cooper is an able bodied man, capable of earning from sixty, seventy-five or one hundred dollars per month; that your Complainant is, at the present time, pregnant with a child by the Defendant, which is supposed to be delivered sometime this month; that she is, on account of her condition, unable to earn a livelihood and is wholly dependent on her mother and father for care and protection; that she has no money whatever with which to provide herself with the necessities of life, or with which to employ counsel to prosecute this case for her. She is now and has been since August 7, 1930, living with her parents who are burdened with the care of supplying her with the necessities of life.

Arvis Cooper

LENNIE B. BARKER, WITNESS FOR THE COMPLAINANT, BEING DULY SWORN DEPOSES AND SAYS AS FOLLOWS:

My name is Lennie Barker. I am a sister to Mrs. Cooper, the Complainant in this cause. I am a white woman. Mrs. Cooper came to Cooper's place on August 7th, and heard his curses, abuse and threaten her and drive her away from his place, telling her to take her things and leave and not come back. I have known the Defendant, Rel Cooper, for the past six years and have been around him quite a bit since he married my sister Arvis Cooper. He is a man of unusually high temper. My sister is now living with her father and mother. The Defendant, Rel Cooper, so far as I know, has not been to see my sister since he drove her away from his place.

Lennie Barker

A. F. NORTHCUTT, WITNESS FOR THE COMPLAINANT, BEING DULY SWORN DEPOSES AND SAYS:

My name is A. F. Northcutt. I am a resident of Baldwin County, Alabama. I am the father of Arvis Cooper, the Complainant in the above cause. My daughter and the Defendant, Rel Cooper, were married at Lowley, in Baldwin County, Alabama, on or about September 18, 1928, and they have both lived in Baldwin County, Alabama, continuously

since that time. My daughter, prior to August 7th., has come to my place telling me and her mother that her husband, Rel Cooper, had had driven her away and had cursed and abused her, but each time we talked the matter over with her and told her it was best for her, if possible, to live with him and probably he would change. Rel Cooper is a man of very high temper. On or about August 7th., 1930, my daughter came to my place and told me that her husband had ~~driven her away and had cursed and abused her~~ and put her belongings on the truck and ordered them carried to my place. She has been living with me since that time. Knowing Rel Cooper as I do I believe that if my daughter should have continued to live with him he would have carried out his threats and would have thereby done her actual violence, which would have necessarily endangered her life and health. She was, at that time and is at this time, pregnant with a child by the Defendant and is unable to earn a livelihood and is wholly dependent on me and her mother for the necessities of life and proper care. She has no funds with which to provide herself with the necessities of life or to prosecute this case. The Defendant, Rel Cooper, is a young man about twenty-four years of age, able bodied and capable of earning around sixty to seventy-five or one hundred dollars per month. Defendant, Rel Cooper, has not been to my place to visit my daughter since she came there on August 7th., just passed:

C.B. H. North et al

ORAL EXAMINATION.

I, T W Reimer, as Register and Commissioner hereby certify
that the foregoing deposition...on Oral Examination was taken down in writing by me in the words
of the witness ss and read over to them and they signed the same in the presense of
myself And Hon H M Hall Atty
at the time and place herein mentioned; that I have personal knowledge of personal identity of said
witness ss or had proof made before me of the identity of said witness.....; 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 14 day of Nov 1923
T W Reimer (L. S.)

NO. PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Carrie Cooper

vs. Complainant

Ree Cooper

Respondent.

Oral Deposition

Filed Nov 14 1923

T W Reimer Register.

Recorded in

Record

Vol. Page

Register

IN THE CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA.
BALDWIN COUNTY.

AVIS COOPER,
Complainant,
vs.
REL COOPER,
Respondent.

Comes the Respondent, Rel Cooper, and for answer to the Original Bill of Complaint in this cause filed, says:

FIRST:

Answering the "FIRST" paragraph, respondent admits that both he and the complainant are bona fide residents of Baldwin County, Alabama, and have been such for more than three (3) years next immediately preceding October 2, 1930, and that he is over the age of twenty-one years; respondent denies that the complainant is eighteen years of age and alleges that at the time of their marriage during the month of September, 1926, the complainant was seventeen years of age, and is now about the age of twenty-one years.

SECOND:

Respondent admits the allegations of paragraph "SECOND".

THIRD:

Respondent denies the allegations of the "THIRD" paragraph and alleges and avers that he and the complainant ceased to live together as man and wife on, to-wit, August 6, 1930.

FOURTH:

Respondent denies all of the allegations of the "FOURTH" paragraph and alleges and avers that on August 6, 1930, the complainant without just cause or legal excuse voluntarily deserted and abandoned the respondent, and has never returned to live with him as his wife.

FIFTH:

Respondent admits all of the allegations of the "FIFTH"

(page two)

paragraph, except the allegation that the complainant "is wholly dependent on her parents", and alleges and avers that the respondent has, on account of the condition of the complainant as alleged in the Bill of complaint, stood ready, able and willing to supply to her all of the necessities of life and to secure for her all necessary medical attention and necessities that will be incident to her expected confinement, and has in fact already completed arrangements to that end.

Rel Cooper, Respondent

Forborne Stone
Solicitor for Respondent.

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