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STATE OF ALABAMA.
COUNTY OF BALDWIN.

Washington and the state of the

Complainent,

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CHARLES TERMS.

hospondent.

IN THE CIMOUIT COURT OF BALDWIN COURTY. IN EQUITY.

DIE HOE. FRANCIS V. HARS. JUDGE OF SAID COURT.

BILL OF COMPLAINT

I. Your complainant, JASSIE HIPM, a resident of Baldwin County, Alabama, respectfully shows to Your Monor that she is of lawful age and that on or about the 6th day of March, 1931, your Complainant and the Acapondent were married in Encancia County in the city of Pensacola, Florida, and that they lived together as man and wife until on or about the 23th day of August, 1931, residing in Baldwin County, Alabama, and that your Complainant has been a bone fide resident of Baldwin County, Alabama, for more than three years next preceding the filing of Sits Bill.

- 2. Your Complainant shows to this Monorable Court that the Respondent, CHARLES HIPSH, is a non-resident of the State of Alabama, and that he is of a roving disposition; that he has, as for as she knows, no permanent place of goods, but when last heard from he was in the state of Texas, and that he is a non-resident of the state of Alabama.
- 3. Your Complainant shows to this Honorable Court that the Respondent is a man of highly nervous and jealous disposition; that soon after the marriage of your Complainant to the Respondent the Respondent began to falsely accuse your Complainant of unfaithfulness toward him and would not permit your Complainant to even converse with her brothers nor her mother, or to leave him for only a few moments at the time, and that he would follow your Complainant around about the place, and if she sought to engage in a conversation with her mother or any member of the family, would seize upon her, put his hands over her mouth and direct her to stop talking to any of her relations, and that he would not permit her to talk to any person; that he would compal her to leave the company and threaten her to do her grievous and bodily harm if she persisted therein. That one day he the city of Mobile. Alabam, on or about the 28th day of August, 1931, that your Complainant went to the city of Mobile in company with her ausbend, the Respondent, to visit her mother, who was in the hospital, and that after they had left the hospital, that the Respondent seized her and attempted to pick her up, carry her and put her into an automobile, and partly tere the clothing from off her body. Your Complainant further shows to this Honorable Court that on various and divers occasions the Respondent, her said husband, attempted to get her into an automobile and told her that he was going to drive the automobile off the bank into the river and drawn both your Complainant automobile off the bank into the river and drawn both your Complainant automobile four that he would take her life rather than see her in company with some other person.

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Your Complainant further shows to this Monorable Court that she lives in dread and constant fear of coming in contact with the Respondent, her said husband, and that she verily believes that there is danger of his taking her life or doing her grievous bodily harm. Your Complainant further shows to this Monorable Court that she has good reason to believe and Joses balieve that he, the Respondent, will do her grievous and bodily harm should she meet him alone, and that she does not believe it safe to be left glone with him. Your Complainant further slows that at various times he has threatened to take her life.

- 4. Complainant further move to this Henorable Court that to this marriage no children have been born.
- that during the months of farther shows to this Honorable Court that during the months of fart married life that on various occasions the Respondent farequited, threatened and committed acts of violence upon the body four Complainant by holding her striking her and tearing her/clothes from her body. Your Complainant further avera that since on a about the 20th day of angust, 1931, immediately after said agraed and battery was committed upon your Complainant has returned and lived with her mother and has not lived with her mother and has not lived with and Respond to a lived with her mother and has not lived with said Respond to the condone such assaults.

that four Honor will take jurisdiction of the said cause made by the Bill of Complaint. Will judge notice thereof to be served on the Respondent, CHARLES PERF. Monorable to the rules of this Honorable Court and the laws of this State in such matters partaining, and make him respond to said Bill of Complaint, requiring him to enswer, plend or down within the time allowed by law.

Your Complainant further prays that upon the final hearing of this cause that Your Honor will grant her a decreeou divorce, granting her the right to re-marry and granting her the right to resume her former maiden name. JASSIE McCORMICK. And for such other relief as may in equity and good conscience be due your Complainant in the presides, your Complainant will ever pray.

Jessie Hipsh

F. F. Nelson

W(OT) TO TIE:

That the Respondent be required to answer each section and paragraph of this Bill from L to 5. inclusively, but cath thereto is bereby expressly waived.

F. F. Nelson

Solicitor for Complainant

Mour Completent further chose to this stoporable Court that case lives in about and constraint feat of contour in contour of the che literation, and include the vertily bold was that there is denied to the tast of the tast and there are denied to the granteness bodil/ harm, tent to denied the literation shows to the contour be granteness bodil/ harm, can be account to believe the lower that are assent to believe the last contour believe that he free capandest, will as now not believe it safe to be deed has about the contour that the last to be contour to be contour that the last the las

to this was tage no children take been born.

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merefore, premises concidered, year Complained press that Four Compleint, will deside notice thereof to be cerved on the Respondent, CHARLER MEST. Mederating to the protes of this Homerable Court and the less of this State in such extlers pertaining, and make him respond to said Bill of Complaint, requiring him to sarcher plead or demur within the pine-sidewealth inv

Loar Complainest further grays that upon the final hearing of this agent the final hearing at this agent the final fear luner will grant and a decreesof liveroe. grantly her the right to re-meanly put grantly fine the right to remain her fermer action again, final kelf kelf like. And les south other relief of the right to equit, and post the final count of the final final grantless. Jour Completeness will ever prop-

Jessie Hipsh

F. F. Nelson

Solicitor for Complained

MICH. HORRY

Mat the Respondent be regulated to sharer cash bection and paragraph of this bill from 1 to 5. inclusively, but cath thereto is bereby expressly waited.

F. F. Melson

Solicitor for Complainant

The State of Alabama,	No	Circuit Court, in Equity.
THAC	TR UTDOH	Complainant
	VS.	· · · · · · · · · · · · · · · · · · ·
		Defendant
This cause, coming on to be heard a decree pro confesso and the testimony as a Court is of opinion that the Complainant is IT IS, THEREFORE, Ordered, adjumony heretofore existing between the Consolved, and the Complainant is forever diverged.	t this Term, was submitt noted by the Register; and s entitled to the relief pra udged and decreed by the nplainant and Defendant b orced from the Defendan	yed for in said bill. Court, that the bonds of matrice, and the same are hereby dist, on account of cruelty
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	**************************************	S H. W.
It further orderd, that the said	JESSIE HIPSH	
be, andshe is hererby permitted to Court in this cause.		
It is further ordered, that the said	JESSIE HIPSH	
pay the costs herein taxed, for which exe	ecution may issue, and if	such execution is returned no
property found," then execution for such	n costs may issue against	the said
It is further ordered, adjudged and	d decreed that said	JESSIE HIPSH
shall not again marry except to said until sixty days after this date, and that marry again except to saidC	t if an appeal is taken wit	hin sixty days 3.1. he shan hove
(0	d	uring the said pendency of appeal
Thisday of	Geril JW	19 32 Vare Direuit Court of Baldwin County.
STATE OF ALABAMA, Baldwin County.		Circuit Court, in Equity
en e	R	egister of said Circuit Court of said
County, Alabama, do hereby certify that	at the above is a full, tru	e and correct copy of the decree
rendered by said Court on the	day of	192
in the earse of		
In the cause of	4	Complainant
	vs,	
		Defendant
of mogord in said Court.		
day of		

NO.

THF STATE OF ALABAMA BALDWIN COUNTY CIRCUIT COURT, IN EQUITY. BALDWIN COUNTY, ALA.

HESTI HIPSH

CHARLES HIPSH

DECREE OF DIVORCE.

Filed in office this

day of

Register.

E. O. M.

Moore Printing Co. :::: Bay Minette, Ale

STATE OF ALABAMA,)
COUNTY OF BALDWIN.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY. IN EQUITY.

JESSIE HIPSH,

Complainant,

VS

CHARLES HIPSH,

Respondent.

THE HON. FRANCIS W. HARE, JUDGE OF SAID COURT.

BILL OF COMPLAINT

- l. Your complainant, JESSIE HIPSH, a resident of Baldwin County, Alabama, respectfully shows to Your Honor that she is of lawful age and that on or about the 6th day of March, 1931, your Complainant and the Respondent were married in Escambia County in the city of Pensacola, Florida, and that they lived together as man and wife until on or about the 28th day of August, 1931, residing in Baldwin County, Alabama, and that your Complainant has been a bona fide resident of Baldwin County, Alabama, for more than three years next preceding the filing of this Bill.
- 2. Your Complainant shows to this Honorable Court that the Respondent, CHARLES HIPSH, is a non-resident of the State of Alabama, and that he is of a roving disposition; that he has, as far as she knows, no permanent place of abode, but when last heard from he was in the state of Texas, and that he is a non-resident of the state of Alabama.
- 3. Your Compliainant shows to this Honorable Court that the Respondent is a man of highly nervous and jealous disposition; that soon after the marriage of your Complainant to the Respondent the Respondent began to falsely accuse your Complainant of unfaithfulness toward him and would not permit your Complainant to even converse with her brothers nor her mother, or to leave him for only a few moments at the time, and that he would follow your Complainant around about the place, and if she sought to engage in a conversation with her mother or any member of the family, would seize upon her, put his hands over her mouth and direct her to stop talking to any of her relations, and that he would not permit her to talk to any person; that he would compel her to leave the company and threaten her to do her grievous and bodily harm if she persisted therein. That one day in the city of Mobile, Alabama, on or about the 28th day of August, 1931, that your Complainant went to the city of Mobile in company with her husband, the Respondent, to visit her mother, who was in the hospital, and that after they had left the hospital, that the Respondent seized her and attempted to pick her up, carry her and put her into an automobile, and partly tore the clothing from off her body. Your Complainant further shows to this Honorable Court that on various and divers occasions the Respondent, her said husband, attempted to get her into an automobile and told her that he was going to drive the automobile off the bank into the river and drown both your Complainant and himself. Your Complainant further shows to this Honorable Court that he would take her life rather than see her in company with some other person.

Your Complainant further shows to this Honorable Court that she lives in dread and constant fear of coming in contact with the Respondent, her said husband, and that she verily believes that there is danger of his taking her life or doing her grievous bodily harm. Your Complainant further shows to this Honorable Court that she has good reason to believe and does believe that he, the Respondent, will do her grievous and bodily harm should she meet him alone, and that she does not believe it safe to be left alone with him. Your Complainant further shows that at various times he has threatened to take her life.

- 4. Complainant further shows to this Honorable Court that to this marriage no children have been born.
- Your Complainant further shows to this Honorable Court that during the months of their married life, that on various occasions the Respondent assaulted, threatened and committed acts of violence upon the body of your Complainant by holding her, striking her and tearing her clothes from her body. Your Complainant further avers that since on or about the 28th day of August, 1931, immediately after said assault and battery was committed upon your Complainant by the Respondent in the city of Mobile, that your Complainant has returned and lived with her mother and has not lived with said Respondent as his wife, and she cannot and will not condone such assaults.

Wherefore, premises considered, your Complainant prays that Your Honor will take jurisdiction of the said cause made by the Bill of Complaint, will cause notice thereof to be served on the Respondent, CHARLES HIPSH, according to the rules of this Honorable Court and the laws of this State in such matters pertaining, and make him respond to said Bill of Complaint, requiring him to answer, plead or demur within the time allowed by law.

Your Complainant further prays that upon the final hearing of this cause that Your Honor will grant her a decree of divorce, granting her the right to re-marry and granting her the right to resume her former maiden name, JESSIE McCORMICK. And for such other relief as may in equity and good conscience be due your Complainant in the premises, your Complainant will ever pray.

for Complainant

FOOT NOTE:

That the Respondent be required to answer each section and paragraph of this Bill from 1 to 5, inclusively, but oath thereto is hereby expressly waived.

Lecusian House

KECORDER

Gue De 1831 Millerin

STATE OF ALABAMA,	CIRCUIT COURT	
Baldwin County.	No. 1112 Vaca	tion Term, 19 32
	Jessie Hipsch	
·	V8.	, Complainant
· · · · · · · · · · · · · · · · · · ·	Charles Hipsch,	, Defendant
To T.W.Richerson,	, Register:	
	a Decree Pro Confesso having been taken and the cause being ready for submissio	•
defense having been interposed,	the Complainant, by F.F.Ne.	lson,

this written request to deliver the papers in this cause to the Judge for final decree in vacation.

J. J. Melson.

Solicitor for Complainant.

Solicitors of record, now files with the Register of this Court

No. 1112.	Page	: : : : : : : : : : : : : : : : : : :
BAI	TATE OF ALABAMA LDWIN COUNTY I COURT, IN EQUITY	
Jessie	e Hipseh	
***************************************	vs.	
Charlie	Hipsch.	***************************************
REQU	EST FOR DECREE IN VACATION	
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RECORDED IN	PAGE	
	MOORE PTG. CO	Register

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The State of Alabama, Baldwin County

In Circuit Court, in Equity

Jessie Hipsh		•		
vs.	7			
Charles Hipsh	S			`
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sonally appeared F.F. Nelson	. attorney	for Complai	nant	
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		Sec. 1997		
	known to	me, who being d	uly sworn deposes	and carrethat
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Charles Hipsh				
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is a non-resident of the	ne State of Alaba	ama, and that	his last know	n address was
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County, Ala.		is		

STATE OF ALABAMA

BALDWIN

County

Affidavit of Non-Resident

IN CIRCUIT COURT IN EQUITY

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Register Circuit Court, Baldwin County, Ala.

STATE OF ALABAMA County of Baldwin

	G.G.Sternensor	being first	t duly sworr	i desnoses ai	nd save that	hρ
NOTICE FO NON-BESIDENT Jessie Hippier Stratics Hippier The State Of Alabama, Baldwin Carguit Court, in Equity. This the 715 day of December too.	is the publisher of lished every Thursd English language ar	THE BALDWIN lav at Robertsd:	V COUNTY ale. Baldwii	·NEWS, a r i County. A	iewspaper pu labama in t	ab-
Circuit Court in Fami	bama; that the not	tice hereto atta	ched of		•	
This the 7th day of December 1931.		Non Reside				
In this cause it being made to appear to the Clerk of this Court by the		ipsh Vs Cha		sh		
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Charles Hipsh is a non-resident of the known address is not known to are			•			
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irly days of January, 1932 or after	Date of third public	ation Dec 24	1931	Vol. 10	No. 36	
d Charles Fine taken against the	Date of fourth publi	cation Dec 31	1931	Vol. 10	No. 37	
T. W. RICHERSON	And said affiant fu	rther states the	at these is	no contract.	agreement	or
F NELSON, Register. fty. for Complainant. dec10-17-24-31-4t	understanding betw the officer charged paper, for any adva that the sum charge regular price for suc	een himself and with the duty antage, gain or d for he publicat	d of advertis profit to a	ing said not	ice in a nev	VS-
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The State of Alabama,	CIRCUIT COURT, IN EQUITY.			
Baldwin County.	No. VACATION Term, 19232			
JESSIE	HIPSH Complainant			
vs. CHARLES	HIPSH Defendant_			
	T.W.RICHERSON that the order of published for four consecutive weeks, commencing on the			
day ofDecember,	192 31, in the Baldwin County News			
	Alabama, that a copy of said order was postedCounty, on the 31st day of			
December 192 31, and				
And it now further appearing to the Re	gister T.W.RICH ERSON , that the said			
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	d to or answer the Bill of Complaint in this cause, it			
	, ordered and decreed by the Register			
taken as confessed against the saidCHARLE	es hipsh			
ThisAthday ofApril	192.32 Molice Register			

STATE OF ALABAMA,)
COUNTY OF BALDWIN.)

SARAH SILCOX, Complainant,

vs.

JESSE SILCOX, Respondent.

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

12736

Comes now your complainant, SARAH SILCOX, presents her Bill of Complaint against JESSE SILCOX and shows to your Honor as follows:

That your complainant and the said Jesse Silcox are both over the age of twenty-one years, are both bona fide residents of the state of Alabama and have been for a period of over three years next preceding the filing of this Complaint, and are both now residents of Baldwin County, state of Alabama.

That your complainant and Jesse Silcox were married on the 4th day of December, 1930, at Bay Minette, Baldwin County, Alabama, and that they lived together as man and wife until on or about the 30th day of December, 1932; that to said marriage no children were born.

Your complainant shows to your Honor that during the month of December, 1932, while your complainant and respondent were living together as man and wife in Baldwin County, Alabama, that the said JESSE SILCOX committed actual violence upon your complainant by beating and striking her in the face and chest with his fist and cursed and abused your complainant and told her that he might just as well use his knife on your complainant, which violence was attended with danger to her life or health. Your complainant further avers that since said assault and battery she has not lived with the respondent as his wife and that she cannot and will not condone said assault and violence.

Your complainant further shows to this Honorable Court that Jesse Silcox is an ablebodied man and able to provide for your complainant. Complainant further shows that he has refused to supply and keep your said complainant in the necessities of life the greater part of the time since their marriage, and that at the present time said respondent is incarcerated in the state penitentiary, and that your complainant is without funds and is dependent upon her daily labor for support. Your complainant further shows to this Honorable Court that during the time of their said marriage your complainant was compelled to call upon relatives for assistance.

The premises considered, your complainant prays that Your Honor will take jurisdiction of the cause made by this Bill of Complaint, will cause notice thereof to be served on the respondent, Jesse Silcox, according to the rules of this Honorable Court and the laws of this State in such matters pertaining, and make him respondent to said Bill of Complaint requiring him to answer, plead or demur within the time allowed by law.

And your complainant further prays that upon the final hearing of this cause your Honor will grant her a decree dissolving

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the bonds of matrimony now existing between your complainant and the said Jesse Silcox, granting her an absolute divorce, granting her the right to marry again.

F. F. Releven Solicitor for Complainant

FOOT NOTE: The respondent is required to answer each and every paragraph of the foregoing Bill of Complaint, but not under oath, his oath thereto being hereby expressly waived.

FF Ju Complainant

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The State of Alabama, Baldwin County

Circuit Court of Baldwin County, In Equity

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

Daerex Page 49 Cont

Sarah Silcox

Sarah Silcox

Sarah Silcox

Jesse Silcox

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Summons

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FILE	7117	

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Deputy Sheriff.

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CHANCERY EXECUTION BILL OF COSTS

No. // / 7	Vs.		Plain	tiff
and the state of t	A. L.		Defenda	ant
FEES OF REGISTER (3)	Dollars Cents	Brought Forward	s	<u></u>
Filing each bill and other papers\$ 10		For Receiving, keeping and paying		
Issuing each subpoena 50		out or distributing money, etc.; 1st		
Issuing each copy thereof 40 Entering each return thereof 15	46	\$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,-		
For each order of publication 100		000 and not exceeding \$10,000, 1-2 of		
Issuing writ of injunction 1 50		1%, all over \$10,000 1-4 of 1%.		
For each copy thereof 50 Entering each return thereof 15		Receiving, keeping and paying out money paid into court, etc., 1-2 of		20 miles (1997)
Issuing Writ of Attachment 1 00		1% of amount received.		
Entering each return thereof 15	1.4	Each notice sent by mail to creditor1 Filing, receipting for and docketing each	5	18 19 J
Docketing each case 1 00 Entering each appearance 25		claim, etc.	5	
Issuing each decree pro confesso on per. ser. 1 00		For all entries on subpoena docket, etc. 5	0	
Issuing each decree pro confesso on publica, 1 00 Each order appointing guardian 1 00		For all entries on commission docket,	0	
Any offier order by Register 50		Making final record, per 100 words 1		
Issuing commission to take testimony 50		Certified copy of decree 1 0		
Receiving and filing 10 Endorsing each package 10		Report of divorce to State Health Office 5 (Acts 1915)	9	
Entering order submitting cause 50		Total Fees of Register		· · · · · · · · · · · · · · · · · · ·
Entering any other order of court 25 Noting all testimony 50		FEES OF SHERIFF		
Noting all testimony 50 Abstract of cause, etc. 100		No. of the second secon		
Entering each decree 75 For every 100 words over 500 15 Taking account, etc. 3 00 Taking testimony, etc.		Serving and returning subpoena on deft. \$1 5 Serving and returning subpoena for	U /	100
For every 100 words over 500 15		witness 6	1 2 1	
Taking testimony, etc. Malana 15		Levying attachment 3 00 Entering and returning same 2		. 5
Each report, 500 words or less 2 50	The Thirty	Selling property attached		,899V.
For every 100 words over 500 15 Amount claimed less than \$500, etc 2 00		Impaneling Jury 7		1
Issuing each subpoena 25		Executing writ of possession 2 50 Collecting execution for costs 1 50		7)
Issuing each subpoena 25 Witness certificate, each 25 Issuing execution, each 75	2007	Serving and returning sci. fa., each 6	1 1 mm	
Issuing execution, each		Serving and returning notice 6.		. •
Taking and approving bond, each 1 00		Serving and returning writ of injunction 1 5 Serving and returning writ of exeat 1 5		
Making copy of bill, etc. 15 Each notice not otherwise provided for 50		Taking and approving bonds, each 7		
Each certificate or affidavit, with seal 50		Collecting money on execution 2 5	٨	
Each certificate or affidavit, no seal 25		Serving and returning application, etc. 1 0		., . ;
Hearing and passing on application, etc. 3 00 Each settlement with receiver, etc.	and the same	Serving attachment, contempt of court 1 5	0	
Examing each voucher of Receiver, etc. 10	4 1 1	Total Fees of Sheriff	50 S	25
Examing each answer, etc. 3 00 Recording resignation, etc. 75		RECAPITULATION		26 - 1347
Entering each certificate to Supreme Court 50		Register's Fees R2 1/2 1/2 D22	hafir S	
Taking questions and answers, etc. 25 For all other ser relating to such proceedings 1 00	1 10	Sheriff's Fees (State 10)	4	y sometime.
For services in proceeding to relieve min-		Commissioner's Fees	36	***
ors, etc., same fee as in similar cases.		Witness Fees		
Commission on sales, etc.: 1st \$100, 2 per ct.; all over \$100 and not exceeding		Guardian Ad Litem	. 2	× * .
\$1,000, 1 1-2 per ct; all over \$1,000,		Printer's Fees)n	Mil Pi
and not exceeding \$20,000, 1 per ct.; all		Recording Decree in Probate Court		and the second
over \$20,000, 1-4 of 1 per ct.	11 4			
Sub Total Carried Forward	7///	Total	///	03
Siz.			1 1	<u> </u>
The State of Alabama,	No.	1/2-2		-SYAME
Baldwin County.	#	ourt, In Equity Jug Terr	m, 193_	***
To Any Sheriff of the State of Alabama—GR	EETING:	Mit, in Equity left		
		nd chattels, lands and tenements of		<u></u>
alan da la descripción de la companya della companya de la companya de la companya della company	ang Proceeding	<i>[</i>	and the second s	on state of the same
		Det	endant	222
you cause to be made the sum of	want he	attact prejudice	——Dolla	ars,
		Angele and the second of the s		1.4 4.5
which	Access Consequently		Plaintiff_	
recovered of	on the_	day of	193_	5
by the judgment of our Circuit Court, held fo	r the county	of Baldwin, besides the sum of		:-
X // 95		All monant		-
		TANA TO L	Dolla	ars,
costs of suit, and have the same to render to the	ne said	canadina to 1-	Security and the second security of the second seco	
and make return of this Writ and the executio				
Interest from	193 t	o date of collection		
Witness my hand, this day of	And his hadley			

S. Register.

ha duly waived right to the exemption of personal property as to the collection of the debt for which this execu-The State of Alabama, Baldwin County. tion is issued. Circuit Court, In Equity. The State of Alabama, Baldwin County. N N

Register.

Received in office this

day of

CHANCERY EXECUTION Fi. Fa.

Sheriff

Execution Docket Page

The State of Alabama, Baldwin County.

By virtue of the within execution I have levied.

Complainant's Solicitor.

. Page-

Total

Execution Docket

Fee Book -

The State of Alabama Baldwin County

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

	JESSIE HIPSH	COMPLAINANT
	VS.	
	CHARLES HIPSH.	RESPONDENT
	e de la companya de l	
1.	T.W. Richerson	
,	and Commissioner, Baldwin County, A	lahema
as itegistei a	illi Commissioner , inches de la commissioner ,	
have called an	nd caused to come before me Jessie Hip	sh and Virginia McCormick
	amed in the requirement for Oral Examination, e office of Register	
100mpc y at 5111		
in Bay M	finette , Alabama, and having f	irst sworn said witness es to speak the
truth, the who	ple truth, and nothing but the truth, the said	Jessie Hipsh
	doth depo	se and say as follows:

My name is Jessie Hipsh. I am a resident of Baldwin County, and have been for over five years, and I married Charles Hipsh on er about March 6th., 1931. We were in Pensacola, Florida, whem we were married. We came back to Baldwin County. I have lived here ever since. My husband and I lived in Baldwin County and he became extremly jealous and nervous and would not permit me to talk any people, even my home folks. If I did he began to abuse me. On various occassions, while I was living with my mother he grabbed me, put his hand over my mouth and threatened to beat me up. On another oceassion when my mother was sick over in Mobile in the hospital he attempted no make me leave my mother, seized me and attempted to carry me and put me in an automobile and partly tore the clothes off of my back. Immediately thereafter we rode in an automobile and came to a river and he tried to drive the automobile in the river, claiming that he wanted to drown both of us. He further told me that he would take my life wather than see me with someone else. I am afraid of him and know that he would do me bodily harm or kill me if he could. I would be afraid to be alone with him anywhere. He has threatened my life many times. We separated immediately after the fight in mobile. Since the time we separated I have lived with my mother near Robertsdale, in Baldwin County. I have not lived with my hushand since the 28th day of August, 1931.

Jedsie Hipsk.

Mrs. Virginia McCormick, who being first duly sworn to speak the truth, the whole truth, and nothing but the truch, doth depose and say as follows:-

My name is Mrs. Virginia McCormick. I am the mother of Jessie Hipsh. I know when Jessie Hipsh and Charles Hipsh were married. I was present at the time. They were married in Pensacola, and came back to Baldwin County, Alabama. He would put his hand over my daughter's mouth and would not permit her to talk to me, wher brothers or sisters or anyone about the house. He wouldn't let her answer anyone when she was called. He seemed to be extremely jealous and did not want anyone, except himself to talk to her. He kept constant watch over her all of the time. He assumed a bigoted, domineering attitude toward her at all times. It was absolutely dangerous to my daughter's life to live or to be in the company of this man, alone. From what I saw I believe he would take her life or do her any injuries that he could in anyway possibly hurt her. They lived at my home for sometime. They were living at my house at the time I was taken sack and had to go to the hospital in Mobile. He came with my daughter over to Mobile to see ms, and while they were there he attempted to make my daughter leave me and go away. It was while I was in the hospital and he threatened her life at that time. He was insanely jealous of my daughter without just cause or excuse, and told her that he would rather see her dead than in the company of somebody else. They have not lived together since the 28th day of August, 1931, and I know it is dangerous for her to be in his company alone. I know he would do her bodily harm or take her life if they were alone together and the notion struck him. I do not believe it is safe for her to be in his company at any time. I know he is

Jurging Mccarmels

of the	I,
	time and place herein mentioned; that I have personal knowledge of personal identity of said
	esses or had proof made before me of the identity of said witness; that I am not of the 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 5th day of April
	Molinary (L. S.)
, Register	THE STATE OF ALABAMA, BALDWIN COUNTY IN CIRCUIT COURT, IN EQUITY JESSIE HIPSH COMPLAINANT VS. CHARLES HIPSH RESPONDENT ORAL DEPOSITION Filed April 5th, 193 a RECORDED IN RECORDED IN Record