

THEOPHILUS M. BOYKIN,

PLAINTIFF

VS

DAZEREE DALE BOYKIN,

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

BILL OF COMPLAINT

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

PART ONE

Comes now Theophilus M. Boykin, Plaintiff, and respectfully shows to the Court that he is a resident of Baldwin County, Alabama over the age of twenty-one years and that the Defendant Dazeree Dale Boykin is also a resident of Baldwin County, Alabama and over the age of twenty-one years.

PART TWO

1. The Plaintiff alleges that he and the Defendant were legally married in Mobile, Alabama the 1st day of August, 1923 and that both parties have been residents of the State of Alabama ever since said date and for more than three years prior to the filing of this bill and that both of said parties have been residents of Baldwin County, Alabama for more than three years.

2. That on or about the 1st day of April, 1924 the Defendant did voluntarily abandon the bed and board of Your Plaintiff, without good cause, and ever since said date and for more than two years next preceeding the filing of this bill, has continued said abandonment and has refused to live with the Plaintiff as his wife and by reason thereof Plaintiff is entitled to a divorce from the Defendant.


PART THREE

Wherefore, Plaintiff prays that this Honorable Court will take jurisdiction of this cause and upon a hearing thereof will grant to the Plaintiff a decree of absolute divorce from the Defendant and that the Plaintiff may have such other and further relief in the premises as may be just and equitable.

PART FOUR

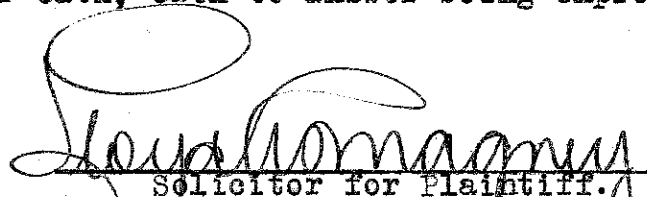
Plaintiff further prays that Your Honor will grant to him the Writ of Summons of the State of Alabama to be directed to the said

Dazeree Dale Boykin, thereby commanding her personally to appear before Your Honor in this Honorable Court within thirty days from the service thereof and then and there to answer to this Bill of Complaint and to stand to and abide such order and decree therein as to this Honorable Court shall seem meet; and Plaintiff shall ever pray &c.

  
Solicitor for Plaintiff.

FOOT NOTE

The Defendant Dazeree Dale Boykin is hereby required to answer the allegations of Part Two of the above Bill, Paragraphs One and Two, inclusive, but not under oath, oath to answer being expressly waived.

  
Solicitor for Plaintiff.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

THEOPHILUS M. BOYKIN

PLAINTIFF

VS

DAZEBEE DALE BOYKIN

DEFENDANT

BILL OF COMPLAINT

*Filed Feb 11/1932  
M. B. Dickinson  
Register*

LLOYD A. MAGNEY  
ATTORNEY AT LAW  
FOLEY, ALABAMA



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

No. *1028*

VS.

PLAINTIFF

DEFENDANT

*Therophilus M. Boykin*  
*Dazere Dale Boykin*

## Bill of Costs

Fees of Register		Dollars	Cts.	Brought Forward	
Filing each bill and other papers	\$ 10		<i>20</i>	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.	<i>2 50</i>
Issuing each subpoena	50		<i>50</i>	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received,	
Issuing each copy thereof	40		<i>40</i>	Each Notice sent by mail to creditors	15
Entering each return thereof	15		<i>15</i>	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
Entering each return thereof	15			Certified copy of decree	1 00
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	<i>1 00</i>	<i>25</i>	Total Fees of Register	<i>3 50</i>
Entering each appearance	25				
Issuing each decree pro confesso on persl ser	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			Laying 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, etc.	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	<i>1 50</i>
Witness certificate, each	25				
Issuing execution, each	75			Recapitulation	
Entering each return	15			Register's Fees	<i>3 50</i>
Taking and approving bond, each	1 00			Sheriff's Fees	<i>1 50</i>
Making copy of bill, etc.	15			Commissioner's Fees	
Each notice not otherwise provided for	50			Solicitor's Fees	
Each certificate or affidavit, with seal	50			Witness Fees	
Each certificate or affidavit, no seal	25			Guardian Ad Litem	
Hearing and passing on application, etc.	3 00			Printer's Fees	
Each settlement with receiver, etc.	3 00			Trial Tax	3 00
Examining each voucher of receiver, etc.	10			Recording Decree in Probate Court	
Examining each answer, etc.	3 00			TOTAL	<i>8 00</i>
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 services in proceeding to relieve minors, etc., same fees 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		<i>2 50</i>			

Received payment this \_\_\_\_\_ day of \_\_\_\_\_ 193\_\_\_\_\_

Register.

*Cost Bill to G. A. Magney for P. L. 2/14/34*

Circuit Court, Baldwin County, Ala.  
In Equity.

No. 1028

*Josephine M. Hopkins*  
VS.  
*Samuel Dale Hopkins*

**Cost Bill**

Paid \_\_\_\_\_ 193\_\_

Register.

Moore Printing Co. Bay Minette

DEFENDANT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

VOLUNTARY APPEARANCE AND  
WAIVER OF SUMMONS.

Comes now Dazeree Dale Boykin, the above named Defendant and enters her voluntary appearance in the above entitled cause and expressly waives the issuance and service of process.

Dated this 9 day of February, 1932.

Dankee D. Bayless  
Defendant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN CHANCERY

**RECORDED**

THEOPHILUS M. BOYKIN

PLAINTIFF

VS

DAZEREE DALE BOYKIN

DEFENDANT

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VOLUNTARY APPEARANCE AND  
WAIVER OF SUMMONS

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LLOYD A. MAGNEY,  
Attorney for Plaintiff.