

ARTHUR HOLK,
Complainant,

-vs-

FREDRICK T. HOYT, as the
Executor of the last will
and testament of NATHAN M.
MackAY, deceased,

and

FREDRICK T. HOYT, as the
administrator of the estate
of ROBERT MackAY, deceased.

Defendants.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.
CASE # _____
ORIGINAL BILL.

TO THE HONORABLE FRANCIS HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA. SITTING IN EQUITY.

Comes your complainant, ARTHUR HOLK, and shows the
following facts to your Honor as the basis for the relief here-
inafter prayed.

FIRST: That the complainant is over the age of twenty-
one years of age and a resident of Baldwin county, Alabama and that
the defendant FREDRICK T. HOYT, as the executor of the last will
and testament of Nathan M. MacKay, deceased was appointed as such
by the Probate Court of Baldwin county, Alabama and the defendant
Fredrick T. Hoyt, as the administrator of the estate of Robert Mac-
Kay deceased is a non-resident of the state of Alabama and a reside
dent of Cook County, Illinois, and his post office address is:

Fredrick T. Hoyt, Esquire,
160 North LaSalle Street,
Chicago, Illinois.

That the property upon which this lien is sought to
be enforced against is at Magnolia Springs, Alabama, in Baldwin
county, Alabama. And that this cause of action arose in and was ^{work}
preformed in Baldwin county, Alabama.

SECOND: That Nathan N. MacKay, in his lifetime owned
the following described property, viz:

Start at the Northwest corner of Section thirty three
run east 25.75 chains; thence south 3.54 chains to the
Northwest corner of Bemis lot in town of Magnolia
Springs; thence south continuing same line 3.50 chains

to the North bank of East prong of Fish River; thence up said river regardless of meanderings 100 feet to a post; thence north 10 chains to stake on north line of said lot and being also south line Oak Avenue; thence west 100 feet to place of beginning, containing 1.38 acres more or less. All in Section 33, township 7 south of range 3 east and in Baldwin county, Alabama.

That on his death this land descended by will to his executor, one of the defendants above named. That the said Executor did lease this property to the deceased Robert MacKay in the lifetime of the said Robert MacKay for the sum of one dollar a year and said lease has at least two years to run. That the said Robert MacKay was an heir and devisee of the said Nathan Ma MacKay and as such had an interest in the property above described.

THREE: That Robert MacKay did employ this complainant to furnish labor and material in repairs, altering and beautifying said premises as shown by an itemized and verified statement filed herewith and evidencing this account. That said work was completed and the money due thereon on to-wit the twenty-second day of January, 1936 in the sum of six hundred and ten dollars and seventeen cents.

FOUR: That the said Robert MacKay died and Fredrick T. Hoyt was appointed the administrator of his estate by the Probate Court of Cook County, Illinois.

FIFTH: That within six months from the completion of said work this complainant filed in the Probate Court a verified statement in writing containing the amount of the demand secured by lien and the name of the owner and description of the property as required by section 8863 of the Code of Alabama.

COMPLAINANT PRAYS that the defendants be made parties respondent to this bill by registered mail and required to plead, answer or demur to the same as required by law.

COMPLAINANT FURTHER PRAYS that upon a hearing of this cause the Court will ascertain the facts herein alleged and determine the interests of the several defendants in the above mentioned property and the defendants lien thereon both as to the land and buildings or improvements thereon and order that the property be sold to satisfy said lien.

Complainant also prays for such other, further and

and different relief as to Equity may seem meet.

E. G. Rickarby, Jr.
As solicitor for Complainant.

FOOT NOTE: The defendants seperately are required to answer each and every paragraph of the foregoing bill of complaint but not under oath, oath being hereby expressly waived.

E. G. Rickarby, Jr.
As solicitor for Complainant.

STATE OF ALABAMA,
COUNTY OF BALDWIN.

Before me, E. G. Rickarby, Jr., a notary public in and for said state and county personally appeared ARTHUR HOLK who being by me first duly sworn deposed and says: In his belief the defendant Fredrick T. Hoyt, as the executor of the last will and testament of Nathan M. MacKay, deceased is a non-resident of the state of Alabama and a resident of Cook County, Illinois and that Fredrick T. Hoyt, as the administrator of the Estate of Robert MacKay is the same man as the Executor of the last will of Nathan M. MacKay and therefor a nonresident of the state of Alabama and that he is over the age of twenty-one years of age and that his post office address is:

Fredrick T. Hoyt, Esquire,
160 North LaSalle Street,
Chicago, Illinois.

Wherefore this complainant requests that service be had on him by registered mail, for both defendants.

Arthur Holk.

Subscribed and sworn to before me
on this the 20 day of July, 1936.

E. G. Rickarby, Jr.
Notary Public, Baldwin county,

Alabama.

STATE OF ALABAMA,

BALDWIN COUNTY.


MATERIALS, WORK AND LABOR.

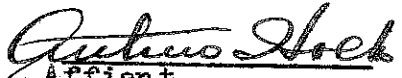
Arthur Holk's account for rendered on the MacKay Property.

Shower unit and building complete as per contract	\$200.00
Tearing out rotten sills and putting in new sills, all new outside baseboards and trimmings, labor 51.25, material \$47.00	98.25
Gravel for driveway, 10 loads 57675#	93.92
Dog yards and extra netting	60.00
Extra Floor in dog kennells	9.00
Railroad iron and labor in cattle guard	16.00
20 foot extention ladder	8.00
Replce sills and other material in pump house	5.00
Painting as per contract, material and labor	350.00
Extra painting, fence posts, birdhouse and stand, painting bathroom, varnishing floors, material and labor,	43.50
Cement curb in driveway, 450 feet	90.00
Cement walk east of garage 40 feet X 30 inches,	22.00
Cement Curb crossing 4'X10'	8.50
New screen wire and labor	1.40
Nails	1.60
6 gallon creosote	3.00
	<u>\$1010.17</u>
December 22nd, 1935, Credited by check on account	<u>200.00</u>
	810.17
April 4th, 1936m Credited by check on account	<u>200.00</u>
	610.17

Work completed and payment due January 22nd, 1936.

Subscribed and sworn to before me on this the 20th
day of July, 1936.


Notary Public, Baldwin county,
Alabama.


Affiant.

ARTHUR HOLK,

Complainant,

-VS-

FREDRICK T. HOYT, as the
Executor of the last will
and testament of NATHAN M.
MackAY, deceased,

and

FREDRICK T. HOYT, as the
administrator of the estate
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Comes your complainant, ARTHUR HOLK, and shows the following facts to your Honor as the basis for the relief hereinafter prayed.

FIRST: That the complainant is over the age of twenty-one years of age and a resident of Baldwin county, Alabama and that the defendant FREDRICK T. HOYT, as the executor of the last will and testament of Nathan M. Mackay, deceased was appointed as such by the Probate Court of Baldwin county, Alabama and the defendant Fredrick T. Hoyt, as the administrator of the estate of Robert Mackay deceased is a non-resident of the state of Alabama and a resident of Cook County, Illinois, and his post office address is:

Fredrick T. Hoyt, Esquire,
160 North LaSalle Street,
Chicago, Illinois.

That the property upon which this lien is sought to be enforced against is at Magnolia Springs, Alabama, in Baldwin county, Alabama. And that this cause of action arose in and ^{work} was performed in Baldwin county, Alabama.

SECOND: That Nathan N. Mackay, in his lifetime owned the following described property, viz:

Start at the Northwest corner of Section thirty three run east 25.75 chains; thence south 3.54 chains to the Northwest corner of Bonis lot in town of Magnolia Springs; thence south continuing same line 8.30 chains

to the North bank of East prong of Fish River; thence up said river regardless of meanderings 200 feet to a post; thence north 10 chains to stake on north line of said lot and being also south line Oak Avenue; thence west 100 feet to place of beginning, containing 1.38 acres more or less, All in Section 33, township 7 south of range 3 east and in Baldwin county, Alabama.

That on his death this land descended by will to his executor, one of the defendants above named. That the said Executor did lease this property to the deceased Robert Mackay in the lifetime of the said Robert Mackay for the sum of one dollar a year and said lease has at least two years to run. That the said Robert Mackay was an heir and devisee of the said Nathan M. Mackay and as such had an interest in the property above described.

THREE: That Robert Mackay did employ this complainant to furnish labor and material in repairs, altering and beautifying said premises as shown by an itemized and verified statement filed herewith and evidencing this account. That said work was completed and the money due thereon on to-wit the twenty-second day of January, 1936 in the sum of six hundred and ten dollars and seventeen cents.

FOUR: That the said Robert Mackay died and Fredrick T. Hoyt was appointed the administrator of his estate by the Probate Court of Cook County, Illinois.

FIFTH: That within six months from the completion of said work this complainant filed in the Probate Court a verified statement in writing containing the amount of the demand secured by lien and the name of the owner and description of the property as required by section 8863 of the Code of Alabama.

COMPLAINANT PRAYS that the defendants be made parties respondent to this bill by registered mail and required to plead, answer or demur to the same as required by law.

COMPLAINANT FURTHER PRAYS that upon a hearing of this cause the Court will ascertain the facts herein alleged and determine the interests of the several defendants in the above mentioned property and the defendants lien thereon both as to the land and buildings or improvements thereon and order that the property be sold to satisfy said lien.

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and different relief as to Equity may seem meet.

E. G. Rickarby, Jr.,
As solicitor for Complainant.

FOOT NOTE: The defendants seperately are required to answer each and every paragraph of the foregoing bill of complaint but not under oath, oath being hereby expressly waived.

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As solicitor for Complainant.

STATE OF ALABAMA,
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Before me, E. G. Rickarby, Jr., a notary public in and for said state and county personally appeared ARTHUR HOLK who being by me first duly sworn deposed and says: In his belief the defendant Fredrick T. Hoyt, as the executor of the last will and testament of Nathan M. Mackay, deceased is a non-resident of the state of Alabama and a resident of Cook County, Illinois and that Fredrick T. Hoyt, as the administrator of the Estate of Robert Mackay is the same man as the Executor of the last will of Nathan M. Mackay and therefore a nonresident of the state of Alabama and that he is over the age of twenty-one years of age and that his post office address is:

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130 North LaSalle Street,
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Wherefore this complainant requests that service be had on him by registered mail, for both defendants.

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STATE OF ALABAMA,

BALDWIN COUNTY.

MATERIALS WORK AND LABOR,

Arthur Holk's account for rendered on the Mackay Property.

Shower unit and building complete as per contract	\$200.00
Tearing out rotten sills and putting in new sills, all new outside baseboards and trimmings, labor 51.25, material \$47.00	98.25
Gravel for driveway, 10 loads 97675	93.92
Dog yards and extra netting	60.00
Extra floor in dog kennels	9.00
Rail and iron and labor in cattle guard	16.00
20 foot extension ladder	8.00
Replace sills and other material in pump house	5.00
Painting as per contract, material and labor	350.00
Extra painting, fence posts, birdhouse and stand, painting bathroom, varnishing floors, material and labor,	43.50
Cement curb in driveway, 450 feet	90.00
Cement walk east of garage 40 feet X 30 inches,	22.00
Cement Curb crossing 4'X10'	8.50
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Nails	1.60
6 gallon creosote	3.00
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December 22nd, 1935,

Credited by check on account

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810.17

April 4th, 1936

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E. G. Rickarby, Jr.
Notary Public, Baldwin county,
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Arthur Holk.
Affiant.

ARTHUR HOLK,

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FIVE: That within six months from the completion of said work this complainant filed in the Probate Court a verified statement in writing containing the amount of the demand secured by lien and the name of the owner and description of the property as required by section 8865 of the Code of Alabama.

COMPLAINANT PRAYS that the defendants be made parties respondent to this bill by registered mail and required to plead, answer or demur to the same as required by law.

COMPLAINANT FURTHER PRAYS that upon a hearing of this cause the Court will ascertain the facts herein alleged and determine the interests of the several defendants in the above mentioned property and the defendant's lien thereon both as to the land and buildings or improvements thereon and order that the property be sold to satisfy said lien.

Complainant also prays for such other, further and

and different relief as to Equity may seem meet.

E. G. Rickerby, Jr.

As solicitor for Complainant.

FOOT NOTE: The defendants separately are required to answer each and every paragraph of the foregoing bill of complaint but not under oath, oath being hereby expressly waived.

E. G. Rickerby, Jr.

As solicitor for Complainant.

STATE OF ALABAMA,

COUNTY OF BALDWIN.

Before me, E. G. Rickerby, Jr., a notary public in and for said state and county personally appeared ARTHUR HOLK who being by me first duly sworn deposed and says: In his belief the defendant Fredrick T. Hoyt, as the executor of the last will and testament of Nathan M. Mackay, deceased is a non-resident of the state of Alabama and a resident of Cook County, Illinois and that Fredrick T. Hoyt, as the administrator of the Estate of Robert Mackay is the same man as the Executor of the last will of Nathan M. Mackay and therefore a nonresident of the state of Alabama and that he is over the age of twenty-one years of age and that his post office address is:

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Wherefore this complainant requests that service be had on him by registered mail, for both defendants.

Arthur Holk,

Subscribed and sworn to before me
on this the 20 day of July, 1936.

E. G. Rickerby, Jr.

Notary Public, Baldwin county,

Alabama.

STATE OF ALABAMA,

BALDWIN COUNTY.

MATERIALS, WORK AND LABOR

Arthur Holk's account for rendered on the Mackay Property.

Shower unit and building complete as per contract	\$200.00
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Gravel for driveway, 10 loads \$76.75	98.00
Dog yards and extra netting	60.00
Extra floor in dog kennels	9.00
Reframed iron and labor in cattle guard	16.00
20 foot extension ladder	8.00
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Cement curb in driveway, 450 feet	90.00
Cement walk east of garage 40 feet X 30 inches.	22.60
Cement Curb crossing 4'X10'	8.50
New screen wire and labor	1.40
Nails	1.60
6 gallon creosote	3.00
	<u>\$1010.17</u>

December 28th, 1935.

Credited by check on account

200.00

810.17

April 4th, 1936

Credited by check on account

200.00

610.17

Work completed and payment due January 22nd, 1936.

Subscribed and sworn to before me on this the 20
day of July, 1936.

J. G. Dickarby, Jr.
Notary Public, Baldwin County,
Alabama.

Arthur Holk,
Attent.

246

MOLLYE F. HARPER, Complainant
VS.
JOHN A. HARPER, Respondent,

EQUITY
CIRCUIT COURT
BALDWIN COUNTY
ALABAMA

This cause being submitted for final decree upon the pleadings and testimony of Complainant as noted by the Register and being considered the Court is of the opinion that the Complainant is entitled to the relief prayed for in her bill.

IT IS THEREFORE ORDERED ADJUDGED AND DECREED that the bonds of matrimony existing between the complainant and respondent be, and the same are hereby dissolved and the complainant Mollye F. Harper is forever divorced from the respondent, John A. Harper, upon the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant have the sole care and custody of James Reynolds Harper the minor child of said marriage but subject to the right of respondent to see said child at reasonable hours.

IT IS FURTHER ORDERED that the respondent John A. Harper provide for the maintenance, support and education of the said James Reynolds Harper until he reach the age of sixteen years in such sum as shall be adequate for the purpose but the amount to be furnished monthly for such purpose the Court does not now determine reserving jurisdiction of this cause for such further orders in the premises as may from time to time become necessary.

IT IS FURTHER ORDERED that neither party shall marry again except to the other within sixty days of this date and that should an appeal be taken neither party shall marry except to the other during the pendency of such appeal.

IT IS FURTHER ORDERED that the respondent John A. Harper pay the costs of this proceeding for which execution may issue.

This Court hereby reserves jurisdiction of this cause for such further orders as may be necessary for the protection of the interests of the child of the marriage.

Done at Monroeville, Alabama, this the 6th day of August, 1936.

F. W. HARE,
Judge.

I, ALICE J. DUCK, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this day of , 1936,

Register of Circuit Court,
In Equity.

To the

HONORABLE FRANCIS W. HARE,
JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
SITTING IN EQUITY:

MOLLYE F. HARPER, by this her bill of complaint presented against JOHN A. HARPER, respectfully shows:

That she and the said John A. Harper, are over the age of twenty-one years and are now and have been for more than five years next preceding the filing of this bill bona fide residents of the State of Alabama and for the last three years, residents of Baldwin County.

SECOND: That on the 24th day of December, she and the said John A. Harper were married in the city of Greenville Alabama and lived together as husband and wife at various places in the State until the month of May, 1935 when they separated, since which time they have not resumed marital relations but have lived separate and apart.

THIRD: That two children were born of this marriage, of whom one, James Reynolds Harper, a boy eleven years of age survives and is now in the care and custody of Complainant and is at present supported by her and her relatives.

FOURTH: That in the months of January and February 1935 the said John Harper committed actual violence on her person by striking and choking her in such manner as to endanger her life and health while in a state of intoxication and continued his intemperate habits after that time till Complainant, for apprehension of further violence, separated from him as aforesaid and has continued to live apart from him, caring for the child of their marriage with the assistance of her relatives, and taking a course of training to be able to support herself and child.

THE PREMISES CONSIDERED, Complainant prays that the said John A. Harper be made defendant to this bill and by proper process be notified to answer same and abide by such orders and decrees as may be made in the premises.

COMPLAINANT FURTHER PRAYS that upon the hearing of this cause a decree be rendered forever divorcing her from the said John A. Harper, granting her the sole custody of the child of the marriage, the right to marry again should she at any time so desire and requiring the said John A. Harper to contribute to the maintainance and education of said child in such sum as the Court may from time to time prescribe in view of said defendant's financial condition and that she may have such other, further or different relief as to equity may seem meet.

Lucille S. Rinkley
Solicitor for Complainant.

MOLLYE F. HARPER,
Complainant

vs

JOHN A. HARPER,
Respondent.

E Q U I T Y
CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

Comes JOHN A. HARPER, Respondent in the above styled cause, and for answer to the bill of complaint says that he denies each and every allegation of same.

He further waives service and notice of demand for the oral examination of Complainant's witnesses, the formal issue of commission to take their testimony and notice of time and place of so doing.

Respondent further agrees that this cause may be submitted for final decree at any time on the pleadings and complainant's evidence but with the understanding that if a decree of divorce is rendered no alimony or counsel fees shall be allowed Complainant who however, shall be given custody of James Harper, the minor child of said marriage, subject to the right of Respondent to see him at all reasonable hours, also that the Court provide that Respondent shall contribute to the support of said James Harper until he reaches the age of sixteen years in accordance with Respondent's income and that the Court reserve jurisdiction of this cause for the purpose of safe guarding the interest of said James Harper.

John A. Harper
Respondent.

STATE OF ALABAMA
COUNTY OF BUTLER.

Before me the undersigned Notary personally appeared this day John A. Harper known to me who acknowledged that he executed the foregoing answer with knowledge of its contents.

Given under my hand and official seal this the 23rd day of July 1936.

[Signature]

Notary Public, Butler County, , Alabama

[Handwritten mark]

CHANCERY EXECUTION

BILL OF COSTS

No. 146

Mallye S Harper vs. John A Harper

PLAINTIFF

DEFENDANT

Table with columns: FEES OF REGISTER, Dollars, Cents, Brought Forward, and a final column for totals. Includes items like 'Filing each bill and other papers', 'Issuing each subpoena', 'Receiving, keeping and paying out or distributing money', etc.

The State of Alabama, Baldwin County

No. Circuit Court, In Equity Term, 193

To any Sheriff of the State of Alabama—GREETING: You are hereby commanded, That of the goods and chattels, lands and tenements of Defendant you cause to be made the sum of Dollars, which recovered of on the day of 193 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of Dollars, costs o' suit, and have the same to render to the said and make return of this Writ and the execution thereof, according to law.

Interest from 193 to date of collection. Witness my hand, this day of 193 Register

MOLLYE F. HARPER,
Complainant,

vs

JOHN A. HARPER,
Respondent,

E Q U I T Y .

CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

DEPOSITION OF MRS BERTA CORTE, WITNESS FOR COMPLAINANT.

The said witness being by me first duly sworn to tell the truth upon examination by the Solicitor for the Complainant, testified as follows:

I am now and have been for many years a resident of Baldwin County and since my marriage have lived in Fairhope. I have known Mrs Molly Harper quite well for several years and during the winter and spring of 1935 saw quite a lot of her. At that time she and her husband lived about three blocks from me. During this time we were quite intimate and I knew that she and her husband were having trouble. She told me on a number of times how mean he was to her when he had been drinking and on several occasions came to my house in tears telling me that he had just struck and abused her. I knew that she was telling me the truth for I could see from her almost hysterical state that something serious had happened. I have never seen him strike her but I know that he did from the way she would come to me so upset. As a rule he did this when intoxicated and as this happened often, I feared that on some occasion he would do her great harm and he probably would had she not left him for he kept getting worse all the time. Though pleasant and affable when sober, when drunk he lost all control of himself and she was right in being afraid of him and leaving him. His drunkenness and mistreatment of his wife was no secret in Fairhope.

Berta Corte

C E R T I F I C A T E .

I, Laurie Garrison, acting as Commissioner by agreement of the parties in a cause pending in the Equity Side of the Circuit Court of Baldwin County, Alabama wherein Mollye F. Harper if Complainant and Jogn A. Harper Respondent, hereby certify that I caused Mrs Berta Corte, a witness for Complainant who is known to me to come before me in the Town of Fairhope where, after being duly sworn by me to tell the truth, upon examination by E. G. Rickarby, Esq, Solicitor for Complainant, she testified as is hereinbefore written; that her testimony, after being reduced to writing was read over and signed by her in my presence.

I further certify that I am not of counsel or of kin to either party to this cause or in anywise interested in the result thereof.

IN WITNESS WHEREOF, I hereto set my hand and seal as Commissioner this the fourth day of August, 1936.

Laurie A. Garrison
Commissioner.

I, T. D. Keyes, acting as Commissioner by agreement of the parties in the case pending on the Equity side of the Circuit Court of Baldwin County, whereby Mollye F. Harper, Complainant and John A Harper, Respondent, by virtue of said commission, I caused Mollye F. Harper to appear before me in Greenville, Alabama, on the 3rd. day of August 1936. Her being first duly sworn by me, upon examination by complainant, she testified as is above set forth; That her testimony was reduced to writing as given by her; read over and signed by her in my presence.

I further certify that I am not of counsel nor of kin to either party to the cause or in any wise interested in the results thereof.

In witness whereof I hereby set my hand and seal as Commissioner this the 3rd. day of August, 1936.

x J. D. Keyes Seal
Commissioner

MOLLYE F. HARPER, Complainant

EQUITY

VS

CIRCUIT COURT

JOHN A HARPER, Respondent

BALDWIN COUNTY

ALABAMA

This cause being submitted for final decree upon the pleadings and testimony of Complainant as noted by the Register and being considered the Court is of the opinion that the Complainant is entitled to the relief prayed for in her bill.

IT IS THEREFORE ORDERED ADJUDGED AND DECREED that the bonds of matrimony existing between the complainant and respondent be, and the same are hereby dissolved and the complainant Mollye F. Harper is forever divorced from the respondent, John A. Harper, upon the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant have the solè care and custody of James Reynolds Harper the minor child of said marriage but subject to the right of respondent to see said child at reasonable hours.

IT IS FURTHER ORDERED that the respondent John A. Harper provide for the maintainance, support and education of the said James Reynolds Harper until he reach the age of sixteen years in such sum as shall be adequate for the purpose but the amount to be furnished monthly for such purpose the Court does not now determine reserving jurisdiction of this cause for such further orders in the premises as may from time to time become necessary.

IT IS FURTHER ORDERED that neither party shall marry again except to the other within sixty days of this date and that should an appeal be taken neither party shall marry except to the other during the pendency of such appeal.

IT IS FURTHER ORDERED that the respondent John A. Harper pay the costs of this proceeding for which execution may issue.

This Court hereby reserves jurisdiction of this cause for such further orders as may be necessary for the protection of the interests

of the child of the marriage.

Done at Monreeville, Alabama, this the 6th day of August 1936

J. A. Hare

Judge.

STATE OF ALABAMA,
Baldwin County.

}
}

CIRCUIT COURT, IN EQUITY.

No. 246 August Term, 1936

MOLLY F. HARPER, Complainant

vs.

JOHN A. HARPER, Defendant

To ROBERT S. DUCK, Register:

an Answer and waiver filed by

In the above stated cause ~~in answer to a bill~~ 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 ELLIOTT G. RICKARBY

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.

Elliott G. Rickarby,
Solicitor for Complainant.

MOLLYE F. HARPER,

Complainant,

vs.

JOHN A. HARPER,

Respondent.

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,

and depositions of Mollye F. Harper

and in behalf of Defendant upon Answer and Waiver

Robert S. Duck

Register.

Duck
~~REGISTER~~
6-443

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

Mallye F. Harper

VS.

John A. Harper

NOTE OF TESTIMONY

Filed in Open Court this 5th

day of August 1936

Robert S. Duck

REGISTER

RECORDED

Duck

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No.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

VS.

REQUEST FOR DECREE IN
VACATION

FILED *Aug. 5* 19*36*

Robert S. Duck
Register

RECORDED IN RECORD

VOL. PAGE

Register

M. F. HARPER, Complainant, EQUITY,
CIRCUIT COURT
VS
J. A. HARPER, Respondent. OF
BALDWIN COUNTY

DEPOSITION OF Witness for Complainant

Filed Aug. 5, 1936
Robert S. Duck, Reg.

ROBERT S. DUCK, Esq.,
Register Circuit Court,
Bay Minette,
Alabama.



M. F. Harper
as compt
J. A. Harper
respt.

Equity
Circuit Court of
Baldwin County

Deposition of Mollie F. Harper, witness
for complainant.

Robert S. Duck, Esq.
Register
Bay Minette,
Alabama

