

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 IRENE BOOTH

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

LESLIE BOOTH

against said IRENE BOOTH

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, Robert S. Duck, Register of said Circuit Court, this 9th day of March 1937

Robert S. Duck Register

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

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Baldwin County

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Robert S. Duck Register

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

LESLIE BOOTH,  
Complainant

vs

IRENE BOOTH,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY

No.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA, IN EQUITY:

Your Complainant, LESLIE BOOTH, exhibits this his bill against IRENE BOOTH and respectfully shows unto your Honor as follows:

FIRST: That the Complainant and the Respondent are both bona fide residents of the State of Alabama, in Baldwin County and have been for a number of years next proceeding the filing of this bill of complaint and that both the Complainant and the Respondent are over the age of twenty-one years and that the Complainant and the Respondent are husband and wife and further shows unto your Honor that of this marriage of the complainant and respondent were born two children namely, V. D. Booth and Lois Elizabeth Booth, V.D. Booth, a boy, who was born November 19, 1933 and Lois who is twenty months old and was born September 24th, 1935.

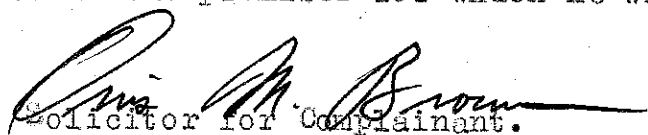
SECOND: Your Complainant shows unto this Honorable Court that on or about March 3, 1937 the respondent, Irene Booth voluntarily without any cause or fault of the Complainant left him against his will and desire and carried with her the two children, V. D. and Lois Elizabeth Booth and since that time has refused the custody of these children to your petitioner, and your Complainant avers that the Respondent is unable to care for these children and has no means bywhich to provide for the same and that the education of these children will be neglected and their health will be placed in jeopardy if they are permitted to stay with the respondent and your complainant further avers and alleges that the environment in which your Respondent has placed these children is undesirable and contrary to the best interest of these children. Your Complainant further alleges and avers that he is the proper

person to have custody and control of these children and that he has a place in which the environment is proper and the children will be properly cared for, disciplined and their welfare will be properly cared for, and he asks that this Honorable Court will grant a hearing upon this petition and will grant him the custody and control of these two children, V. D. and Lois Elizabeth Booth and that be being the father of the children and in proper financial condition to care for them, that the Court will so order and decree to place the custody in him.

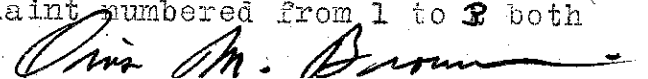
3. Your Petitioner humbly asks that this Honorable Court will whilst this application is pending in this Honorable Court may direct that an injunction or writ ne exeat issue and that they take immediate control and care of these two children and place them in the custody, control and care of your Complainant in order that their safety and wellbeing may be properly cared for and looked after. Your Complainant humbly asks that the Honorable Clerk of the Circuit Court, if he deems necessary or just, that a reference be held immediately and he determine the proper person to have custody and control of these children pending the hearing of this petition.

THE PREMISES CONSIDERED, Complainant prays that the said Irene Booth be made a party to this bill of complaint and that she be brought into Court by the method used by this Court, directing her to plead, answer or demur the allegations as set out against her in said bill of complaint as filed in this Court, as required by law under the rules of this Honorable Court.

And your Complainant prays that upon the final hearing of this Honorable Court of this cause, that the Court will grant to him the absolute control and custody of these two children of which he is the father, namely, V.D. and Lois Elizabeth Booth and your Complainant prays for such further relief as in equity and good conscience he may be entitled to in the premises for which he will ever pray.

  
Solicitor for Complainant.

The Respondent is required to answer but not under oath the same being hereby expressly waived as to each and every paragraph of the foregoing bill of complaint numbered from 1 to 3 both inclusive.



LESLIE BOOTH,  
Complainant

vs

IRENE BOOTH,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY

No.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA, IN EQUITY:

Your Complainant, LESLIE BOOTH, exhibits this his bill against IRENE BOOTH and respectfully shows unto your Honor as follows:

FIRST: That the Complainant and the Respondent are both bona fide residents of the State of Alabama, in Baldwin County and have been for a number of years past preceding the filing of this bill of complaint and that both the Complainant and the Respondent are over the age of twenty-one years and that the Complainant and the Respondent are husband and wife and further shows unto your Honor that of this marriage of the complainant and respondent were born two children namely, V. D. Booth and Lois Elizabeth Booth, V.D. Booth, a boy, who was born November 19, 1935 and Lois who is twenty months old and was born September 24th, 1935.

SECOND: Your Complainant shows unto this Honorable Court that on or about March 5, 1937 the respondent, Irene Booth voluntarily without any cause or fault of the Complainant left him against his will and desire and carried with her the two children, V. D. and Lois Elizabeth Booth and since that time has refused the custody of these children to your petitioner, and your Complainant avers that the Respondent is unable to care for these children and has no means by which to provide for the same and that the education of these children will be neglected and their health will be placed in jeopardy if they are permitted to stay with the respondent and your complainant further avers and alleges that the environment in which your Respondent has placed these children is undesirable and contrary to the best interest of these children Your Complainant further alleges and avers that he is the proper

person to have custody and control of these children and that he has a place in which the environment is proper and the children will be properly cared for, disciplined and their welfare will be properly cared for, and he asks that this Honorable Court will grant a hearing upon this petition and will grant him the custody and control of these two children, V. D. and Lois Elizabeth Booth and that he being the father of the children and in proper financial condition to care for them, that the Court will so order and decree to place the custody in him.

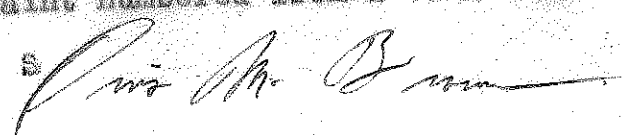
7. Your Petitioner humbly asks that this Honorable Court will whilst this application is pending in this Honorable Court may direct that an injunction or writ be exact issue and that they take immediate control and care of these two children and place them in the custody, control and care of your Complainant in order that their safety and wellbeing may be properly cared for and looked after. Your Complainant humbly asks that the Honorable Clerk of the Circuit Court, if he deems necessary or just, that a reference be held immediately and he determine the proper person to have custody and control of these children pending the hearing of this petition.

THE PREMISES CONSIDERED, Complainant prays that the said Irene Booth be made a party to this bill of complaint and that she be brought into Court by the method used by this Court, directing her to plead, answer or demur the allegations as set out against her in said bill of complaint as filed in this Court, as required by law under the rules of this Honorable Court.

And your Complainant prays that upon the final hearing of this Honorable Court of this cause, that the Court will grant to him the absolute control and custody of these two children of which he is the father, namely, V.D. and Lois Elizabeth Booth and your Complainant prays for such further relief as in equity and good conscience he may be entitled to in the premises for which he will ever pray.

  
Solicitor for Complainant.

The Respondent is required to answer but not under oath the same being hereby expressly waived as to each and every paragraph of the foregoing bill of complaint numbered from 1 to 3 both inclusive.



**CHANCERY EXECUTION  
BILL OF COSTS**

No. 307

Leslie Booth

VS.

June Booth

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%.	2	10
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		40	Each notice sent by mail to creditor	15	
Entering each return thereof	15			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	4 00
Entering each return thereof	15			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			<b>TOTAL FEES OF REGISTER</b>		
Docketing each case	1 00	1 00		<b>FEES OF SHERIFF</b>		7 10
Entering each appearance	25			Serving and returning subpoena on deft.	\$1 50	
Issuing each decree pro confesso on per ser.	1 00			Serving and returning subpoena for witness	65	1 50
Issuing each decree pro confesso on publica	1 00			Levying attachment	3 00	
Each order appointing guardian	1 00			Entering and returning same	25	
Any other order by Register	50			Selling property attached		
Issuing Commission to take testimony	50			Impaneling Jury	75	
Receiving and tiling	10			Executing Writ of possession	2 50	
Endorsing each package	10			Collecting execution for costs	1 50	
Entering order submitting cause	50			Serving and returning sci. fa., each	65	1 50
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			Serving and returning writ of exeat	1 50	
Entering each decree	75			Taking and approving bonds, each	75	
For every 100 words over 500	15			Collecting money on execution		
Taking account, etc.	3 00			Making Deed	2 50	
Taking testimony, etc.	15			Serving and returning application, etc.	1 00	
Each report, 500 words or less	2 50			Serving attachment, contempt of court	1 50	
For every 100 words over 500	15			<b>TOTAL FEES OF SHERIFF</b>		30 0
Amount claimed less than \$500, etc.	2 00			<b>RECAPITULATION</b>		
Issuing each subpoena	25			Register's Fees		7 10
Witness certificate, each	25			Sheriff's Fees		3 00
Issuing execution, each	75			Commissioner's Fees		
Entering each return	15			Solicitor's Fees		
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		
Each certificate or affidavit, with seal	50			Trial Tax	3 00	3 00
Each certificate or affidavit, no seal	25			Recording Decree in Probate Court		
Hearing and passing on application, etc.	3 00			<b>TOTAL</b>		13 10
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 cent; all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent						
Sub Total Carried Forward						

**The State of Alabama,**  
Baldwin County

No. 307  
Circuit Court, In Equity Aug Term, 1937

To any Sheriff of the State of Alabama—GREETING:  
You are hereby commanded, That of the goods and chattels, lands and tenements of

Leslie Booth Defendant

you cause to be made the sum of 13 10 Dollars,

which June Booth Plaintiff

recovered of Leslie Booth on the 18 day of Aug 1937

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of 13 10 Dollars,

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

Interest from 1937 to date of collection.

Witness my hand, this 22 day of Sept 1937  
Leslie Booth Register

*Original*  
*fair copy. JMB*

Serve on Irene Booth

**Circuit Court of Baldwin County**  
**IN EQUITY**

No. 307

**S U M M O N S**

LESLIE BOOTH,

Complainant,

vs.

IRENE BOOTH,

Respondent.

ORVIS M. BROWN

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

RECORDED  
*such*  
*7-44-*

**THE STATE OF ALABAMA,**  
**BALDWIN COUNTY**

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_\_\_\_

SHERIFF

Executed this \_\_\_\_\_ day of \_\_\_\_\_

193\_\_\_\_\_

by leaving a copy of the within Summons with \_\_\_\_\_

Defendant

Sheriff

By \_\_\_\_\_ Deputy Sheriff

*Not found in any*  
*County of Baldwin*  
*search and inquiring*  
*3/12/37*  
*Walter Williams*



Serve on Irene Booth

Circuit Court of Baldwin County  
IN EQUITY

No. 307

S U M M O N S

IRENE BOOTH,

Complainant,

vs.

IRENE BOOTH,

Respondent.

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this

day of \_\_\_\_\_, 193

SHERIFF

Executed this \_\_\_\_\_ day of

193

by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff

ORVIS M. BROWN

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

