

314

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 KATHERINE RHODES,
1100 East DeSoto Street,
Pensacola, Florida.

of _____ 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

HUBERT L. RHODES

against said KATHERINE RHODES

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 5th day of April 193 7

Robert S. Duck Register

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

CHANCERY EXECUTION

BILL OF COSTS

No. 314 Herbert L Rhodes vs Kathern Rhodes PLAINTIFF

DEFENDANT

FEES OF REGISTER	Dollars	Cents	Brought Forward	\$	¢
Filing each bill and other papers	\$	10		3	0
Issuing each subpoena		50		38	0
Issuing each copy thereof		40		40	0
Entering each return thereof		15		15	0
For each order of publication	1	00			
Issuing Writ of injunction	1	50			
For each copy thereof		50			
Entering each return thereof		15			
Issuing Writ of Attachment	1	00			
Entering each return thereof		15			
Docketing each case	1	00		1	00
Entering each appearance		25			
Issuing each decree pro confesso on per ser.	1	00			
Issuing each decree pro confesso on publica	1	00			
Each order appointing guardian	1	00			
Any other order by Register		50			
Issuing Commission to take testimony		50			
Receiving and filing		10			
Endorsing each package		10			
Entering order submitting cause		50			
Entering any other order of court		25			
Noting all testimony		50			
Abstract of cause, etc.	1	00			
Entering each decree		75			
For every 100 words over 500		15			
Taking account, etc.	3	00			
Taking testimony, etc		15			
Each report, 500 words or less	2	50			
For every 100 words over 500		15			
Amount claimed less than \$500, etc	2	00			
Issuing each subpoena		25			
Witness certificate, each		25			
Issuing execution, each		75			
Entering each return		15			
Taking and approving bond, each	1	00			
Making copy of bill, etc		15		3	25
Each notice not otherwise provided for ..		50			
Each certificate or affidavit, with seal ..		50			
Each certificate or affidavit, no seal ..		25			
Hearing and passing on application, etc.	3	00			
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				11	25
			TOTAL	11	25

The State of Alabama, } No. 314
Baldwin County } 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 _____
Herbert L. Rhodes Defendant
 you cause to be made the sum of 1125 Dollars,
 which Kathern Rhodes Plaintiff
 recovered of Herbert L. Rhodes on the 18 day of Aug 1937
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of 1125 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 _____ 1937 to date of collection.

Witness my hand, this 23 day of Sept 1937
Herbert L. Rhodes Register

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

Hubert L. Rhodes

No. *314*

VS.

PLAINTIFF

Katherine Rhodes

DEFENDANT

BILL OF COSTS

FEES OF REGISTER		Dollars	Cents		
Filing each bill and other papers	\$ 10		10	Brought Forward	\$ 2 40
Issuing each subpoena	50		50	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%.	
Issuing each copy thereof	40		40	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Entering each return thereof	15		15	Each notice sent by mail to creditor	15
For each order of publication	1 00			Filing receipting for and docketing each claim, etc.	25
Issuing Writ of injunction	I 50			For all entries on subpoena docket, etc.	50
For each copy thereof	50			For all entries on commission docket, etc.	50
Entering each return thereof	15			Making final record. per 100 words	15
Issuing Writ of Attachment	I 00			Certified copy of decree	1 00
Entering each return thereof	15			Report of divorce to State Health Office (Acts 1915)	50
Docketing each case	1 00	1	00	TOTAL FEES OF REGISTER	
Entering each appearance	25		25	FEES OF SHERIFF	
Issuing each decree pro confesso on per ser.	1 00			Serving and returning subpoena on deft.	\$1 50
Issuing each decree pro confesso on publica	1 00			Serving and returning subpoena for witness	65
Each order appointing guardian	I 00	2	40	Levying attachment	1 50
Any other order by Register	50			Entering and returning same	25
Issuing Commission to take testimony	50			Selling property attached	
Receiving and filing	10			Impaneling Jury	75
Endorsing each package	10			Executing Writ of possession	2 50
Entering order submitting cause	50			Collecting execution for costs	1 50
Entering any other order of court	25			Serving and returning sci. fa., each	65
Noting all testimony	50			Serving and returning notice	65
Abstract of cause, etc.	I 00			Serving and returning writ of injunction	1 50
Entering each decree	75			Serving and returning writ of exeat	1 50
For every 100 words over 500	15			Taking and approving bonds, each	75
Taking account, etc.	3 00			Collecting money on execution	
Taking testimony, etc	15			Making Deed	2 50
Each report, 500 words or less	2 50			Serving and returning application, etc.	1 00
For every 100 words over 500	15			Serving attachment, contempt of court	1 50
Amount claimed less than \$500, etc	2 00			TOTAL FEES OF SHERIFF	
Issuing each subpoena	25			RECAPITULATION	
Witness certificate, each	25			Register's Fees	
Issuing execution, each	75			Sheriff's Fees	
Entering each return	15			Commissioner's Fees	
Taking and approving bond, each	1 00			Solicitor's Fees	
Making copy of bill, etc	15			Witness Fees	
Each notice not otherwise provided for	50			Guardian Ad Litem	
Each certificate or affidavit, with seal	50			Printer's Fees	
Each certificate or affidavit, no seal	25			Trial Tax	3 00
Hearing and passing on application, etc.	3 00			Recording Decree in Probate Court	
Each settlement with Receiver, etc.	3 00			TOTAL	8 40
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					

HUBERT L. RHODES,

Complainant.

Vs.

KATHERINE RHODES,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

TO THE HONORABLE F. W. HARE,

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

IN EQUITY:

Now comes your complainant HUBERT L. RHODES and presents this his bill of complaint against KATHERINE RHODES and shows unto your Honor as follows:

FIRST: That your Complainant and the Respondent, Katherine Rhodes, are both over the age of twenty one years and that your Complainant and the Respondent were both bona fide residents of the State of Alabama, County of Baldwin at the time of separation and have been for a period of time next prior to the filing of this Complaint; that your Complainant is a resident of Baldwin County, Alabama and has been for a period of time proceeding the filing of this complaint and that your Respondent at the present time is a resident of Pensacola, Florida where she has been a resident since March 16th, 1937.

SECOND: Your Complainant and the said Katherine Rhodes were lawfully married in Pensacola, Florida on October 5, 1934 and lived together as man and wife until on or about March 16th, 1937 and further that there was born to the said marriage of complainant and respondent one child, namely Sharlyn Lee Rhodes, a girl who was born November 17th, 1935 and that at this time the said child is with your Respondent and your Complainant further shows unto this Honorable Court that your Respondent is not a fit person to care for and to bring up this child and further that she has not the means with which to care for or educate the child in the manner in which she should be reared.

THIRD: Your Complainant further shows unto your Honor that during the month of February 1937 your Respondent did voluntarily without any cause or fault of your Complainant desert your Complainant and which offense he condoned and she returned to live with him and promised that she would never do so again and again on or about March 16, 1937 without any cause or fault on the part of your Complainant and against his will and desire while he was working in the field, your Complainant's mother-in-law came from the State of Florida, namely Pensacola, and enticed and carried away your Respondent and the child Sharlyn Lee Rhodes against the will and desire of your Complainant. Your Complainant alleges further that the Respondent was guilty of cruelty to your Complainant and neglected to care for and see after the duties and obligations which she owed to your Complainant and she refused to care for and discipline this child Sharlyn Lee Rhodes at all times and alleges further that she is an improper person to have the care and custody of this said child and that your Complainant be given the care, custody and control of this child for half time, six months at a time beginning with the decree in this matter and after the child becomes seven years of age that he be given absolute care, custody and control of the said Sharlyn Lee Rhodes.

PRAYER FOR PROCESS

THE PREMISES CONSIDERED, your Complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and will cause notice thereof to be served on the Respondent, Katherine Rhodes, according to the rules of this Honorable Court and the laws of this State to such matters pertaining and make her respondent to the said bill of complaint requiring her to plead, answer or demur in the time allowed by law.

PRAYER FOR RELIEF

And your Complainant further prays that upon

the final hearing of this cause your Honor will grant him a decree dissolving the bonds of matrimony now existing between your Complainant and the Respondent, Katherine R hodes, and grant him an absolute decree, giving him the right of marriage again and giving him the care, custody and control of his child, Sharlyn Lee Rhodes for half time for six months period at a time and after the child becomes seven years of age that he be given absolute care, custody and control of the child, he being able to educate the child and care for her in the manner which would be proper according to her station in life, and your Complainant prays for such other and further relief as in equity and good conscience in the premises for which he will ever pray.


Solicitor for Complainant.

FOOT NOTE

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 complaint numbered from one to four both inclusive.


Solicitor for Complainant.

Circuit Court, Baldwin County, Ala.
In Equity.

No. _____

VS.

COST BILL

Paid _____, 193_____

Register.

THE STATE OF ALABAMA
Baldwin County.

No. 314

Circuit Court, In Equity

Hudson & Rhodes

vs.

~~Hudson~~ Rhodes

CHANCERY EXECUTION
Fi. Fa.

\$ 1125

Total \$ 1125

Free Book Ads Page 314

Execution Docket _____ Page _____
Orren M Brown
Complainant's Solicitor

THE STATE OF ALABAMA
Baldwin County.

ha _____ duly waived _____ right
to the exemption of personal property as to
the collection of the debt for which this execu-
tion is issued.

Register.

Received in office this 29

day of Sept 1937

M. H. McIlhenny
Sheriff

Execution Docket _____ Page 127

Returned Dec. 18.
1937 No property
of Hudson & Rhodes
found in Hudson's
dwelling.
M. H. McIlhenny
Sheriff

MOORE PRINTING CO., BAY MINNETT, ALA.

The State of Alabama, }
Baldwin County

By virtue of the within execution I have levied _____

Quick
RECORDED
7-88

Serve on Katherine Rhodes

Circuit Court of Baldwin County
IN EQUITY

No. 314

S U M M O N S

HUBERT L. RHODES,

Complainant,

vs.

KATHERINE RHODES,

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

ORVIVS M. BROWN

Solicitor for Complainant

RETURN RECEIPT

From the Postmaster the Registered or Insured Article, the original receipt of which appears on the face of this Card.

(Signature or name of addressee)

(Signature of addressee's agent)

Date of delivery 4/7 1937

RECEIPT FOR REGISTERED ARTICLE No. 596

15 fee paid. 1st class postage paid. 4-5, 1937 (Date)

Declared value Legal Papers surcharge paid, \$0

From R. W. White Cur Clerk (Address)

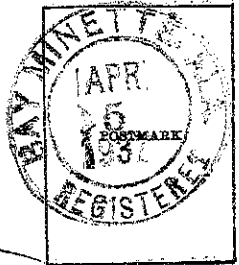
Addressed to R. W. White (Street and number) Ind State (Post office and State)

1100 East Du Bois St (Street and number) Indianapolis, Ind (Post office and State)

Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee 3 (in person or order) Special delivery fee 0

Every restricted to addressee (Fee said 10) Postmaster, per W.D.



12-10-11
 100-100
 Post Office of *London*
 of *100* Street
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