

WILLIAM E. SEXTON
Complainant

EQUITY
CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS

FANNIE SEXTON
Respondent

Comes FANNIE SEXTON, Respondent in the above cause and for answer to the bill of Complainant says that she denies each allegation of same.

She further waives service and notice of demand for oral examination of Complainant's witnesses, the issue of commission to take their testimony, notice of the time and place of taking same and of the right to introduce evidence in her own behalf. She further agrees that this cause may be submitted for final decree at any time upon the pleadings and Complainant's evidence as noted by the Register.

Fannie Sexton
Respondent.

STATE OF ALABAMA

COUNTY OF MONTGOMERY

Before me, the undersigned Notary Public, personally appeared Fannie Sexton who acknowledged before me that being informed of the contents of the foregoing answers she executed to the same voluntarily on this the 14th day of May, 1937.

R. A. Ross
Notary Public, Montgomery County, Alabama

TO THE HONORABLE FRANCIS W. HARE

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

SITTING IN EQUITY:

Comes WILLIAM E. SEXTON and by his bill of complaint presented against FANNIE SEXTON, respectfully shows;

FIRST: That he is a life-long and bona fide resident of the County of Baldwin and over the age of twenty-one years; that FANNIE SEXTON, who is also over the age of twenty-one years has been for more than two years next past a bona fide resident of Baldwin County but is now domiciled in the City of Montgomery. That they were lawfully married in Baldwin County on November 6, 1935 and resided there together as man and wife until about the first day of April 1937 when she left him, since when they have lived separate and apart.

SECOND: That since the date of the marriage aforesaid Fannie Sexton has been guilty of acts of adultery with men and at times and places unknown to complainant but who has recently learned of one specific instance when said Fannie Sexton spent the night with an unknown man in the city of Mobile during the month of March last. Such acts of adultery complainant has not knowingly condoned nor did he know of them positively until his said wife had left him.

THE PREMISES CONSIDERED, complainant prays that the said Fannie Sexton be made party defendant to this bill and by appropriate process required to answer same within the time prescribed by law.

Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing him from the said Fannie Sexton, granting him the right to marry again should he so desire and such other, further or different relief as to equity may seem meet.

William E. Sexton
Solicitor for Complainant.

CHANCERY EXECUTION

BILL OF COSTS

Wm. E. Sexton,
 No. 331 *Complainant* Vs. *Fannie Sexton,* Plaintiff
Respondent Defendant

FEES OF REGISTER	Dollars	Cents	Brought Forward	\$	Cents
Filing each bill and other papers	2	00	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	85
Issuing each subpoena	50		Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.		
Issuing each copy thereof	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	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		Total Fees of Register	3	85
Docketing each case	1	00	FEES OF SHERIFF		
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	
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 filing	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	
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		Total Fees of Sheriff	1	50
Amount claimed less than \$500, etc.	2	00	RECAPITULATION		
Issuing each subpoena	25		Register's Fees	3	85
Witness certificate, each	25		Sheriff's Fees	1	50
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
Each certificate or affidavit, no seal	25		Recording Decree in Probate Court		
Hearing and passing on application, etc.	3	00	Total	8	35
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 ct.; 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	2	85			

The State of Alabama, { No. 331
Baldwin County. { **Circuit Court, In Equity** Fall Term, 1940
 To Any Sheriff of the State of Alabama—GREETING:
 You are hereby commanded, That of the goods and chattels, lands and tenements of William E. Sexton Defendant ...
 you cause to be made the sum of _____ Dollars,
 which Abated by death of Respondent Plaintiff ...
 recovered of _____ on the 21 day of August 1940
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of \$ 8.35 Dollars,
 costs of 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 21 day of Oct. 1940
R. S. Dush, Register.

RECORDED

Book

7-138

WILLIAM E. SEXTON,
Complainant,

versus

FANNIE SEXTON,
Defendant.

B I L L .

Filed May 19 1937

Pro Se
Defendant

ELLIOTT G. RICKAREY,
Solicitor for Complainant.

RECORDED

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7-129

WILLIAM E. SEXTON,
Complainant

VS

FANNIE SEXTON,
Respondent.

A N S W E R
and
Waiver.

Filed May 19 1937
Frank J. [Signature]

