

The State of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County.

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon _____

GRADY G. LONG,

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

BESSIE B. LONG

against said _____ GRADY G. LONG

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, ~~M. A. Stone~~ R. S. DUCK, Register of said Circuit Court, this _____ 3rd _____ day of November _____ 193-7

R. S. Duck Register

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

BESSIE B. LONG)
 COMPLAINANT) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA,
GRADY G. LONG) IN EQUITY.
 RESPONDENT)

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

Now comes the Respondent in the above styled cause and demurs to the cause heretofore exhibited in this complaint by the Complainant and as grounds of demurrer, assigns the following:

FIRST: There is no equity in the bill.

SECOND: That, there are no sufficient allegations of any ground for divorce.

THIRD: That the allegations of cruelty set out in said complaint are mere conclusions of the pleader.

FOURTH: That there is no allegation in said bill, that the complainant is a suitable person to be entrusted with the care and custody of the named minor children; and having thus demurred to the complaint, the respondent hereto exhibits this his answer and cross-bill to the said complaint of the complainant. The respondent avers that both he and the complainant are over the age of twenty-one (21) years and are bonafide residents of Baldwin County, Alabama; and that they were married at Perdido in Baldwin County, Alabama on December 26, 1915. The respondent denies that he has treated the complainant in a cruel or inhuman manner or that he has committed any violence on her person which did therefore endanger her health or life, or that his conduct was such as should be generated in the mind of the complainant any apprehension of violence to her person. The respondent denies that he drinks heavily or has a violent temper, or that he is an unsuitable person to have the custody, and care and control of the said minor children; and the respondent and cross-complainant admits that he is an able bodied man, but denies that the complainant has no visible means of support for in that she is the owner of valuable city lots and buildings; and that she has an income from the said buildings; and that her conduct

has been such, that as a matter of right and justice, she should not be entitled to any alimony for herself, or the custody of the minor children.

And now, having fully answered the bill of complaint exhibited against him, the said respondent prays that this answer be deemed and taken as a cross-bill, and he alleges:

FIRST: The respondent and cross-complainant avers that both he and the complainant and cross respondent are resident citizens of Baldwin County, Alabama, and that each of them is over the age of twenty-one years, and that they have constantly so resided in the State of Alabama for more than three years next preceding the filing of these proceedings.

SECOND: The respondent and cross-complainant avers that he and the said Bessie B. Long were married in Baldwin County, Alabama on to-wit the 26th day of December, 1915.

THIRD: The respondent avers that the said Bessie B. Long has been guilty of adulterous intercourse with one Mr. Drinkard, whose name is otherwise unknown, and one Wheeler McCoy; and other various and sundry men, too numerous to mention, in divers places and at divers times; and that her conduct in this respect has not been condoned by the respondent and cross-complainant; and that this conduct on her part was without any connivance or consent on his part.

FOURTH: The respondent and cross-complainant further avers that the complainant and cross-respondant is a woman of irritable and nervous temperament and who on various occasions has made felonious assaults upon the respondent and cross-complainant with deadly weapons and has severely cut and injured him; and that owing to her nervous and irritable disposition she is no suitable person to have the care and custody of the said minor children who were born to the union of the parties to this cause; and that most of the children have attained the age and the intelligence sufficient to select their own custodian and that these children desire to live with their father; and that custody should, as a matter of fact be entrusted to him rather than to the complainant and cross-respondent.

FIFTH: The respondent and cross-complainant avers that the names and ages of the children born to the union of the parties

to this suit are as follows: Jessie Mae Long, a girl twenty years of age; Grady G. Long Jr., a boy, eighteen years of age; Mary Lee Long, a girl, fourteen years of age; Mose J. Long, a boy, thirteen years of age; Roy Long, a boy, seven years of age.

PRAYER FOR PROCESS AND RELIEF

The premises considered, ~~that~~ respondent and cross-complainant prays that the said Bessie B. Long be made a party respondent and be required to answer this cross-bill under the rules and practices of this honorable court. And he prays that on the final hearing of this cause, your Honor will grant to him a full and complete divorce from the bonds of matrimony heretofore existing between him and the said Bessie B. Long, and will grant to him, the said Grady G. Long, the custody of the minor children born to the union of the parties to this cause and will grant to him the right to again marry should he so desire. The respondent and cross-complainant prays for such other further and general relief to which he may be entitled, premises considered, and he will ever pray, etc.

Horne & Hodnette

HORNE & HODNETTE
Solicitors for Grady G. Long

FOOT-NOTE:

The complainant and cross-respondent Bessie B. Long is required to answer paragraphs First through Fifth, both inclusive, of this cross-bill, but not under oath, answer under oath being hereby expressly waived.

Horne & Hodnette

HORNE & HODNETTE
Solicitors for Grady G. Long

BESSIE B. LONG,
Complainant,

vs.

GRADY G. LONG,
Respondent.

)
(IN THE CIRCUIT COURT OF
)
(BALDWIN COUNTY, ALABAMA.
)
(IN EQUITY. NO. 377.
)
(

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

Now comes the Respondent in the above styled cause and demurs to the cause heretofore exhibited in this complaint by the Complainant and as grounds of demurrer, assigns the following:

FIRST: There is no equity in the bill.

SECOND: That, there are no sufficient allegations of any ground for divorce.

THIRD: That the allegations of cruelty set out in said complaint are mere conclusions of the pleador.

FOURTH: That there is no allegation in said bill, that the complainant is a suitable person to be entrusted with the care and custody of the named minor children; and having thus demurred to the complaint, the respondent hereto exhibits this his answer and cross-bill to the said complaint of the complainant. The respondent avers that both he and the complainant are over the age of twenty-one years (21) and are bona fide residents of Baldwin County, Alabama; and that they were married at Perdido, in Baldwin County, Alabama, on December 26, 1915. The Respondent denies that he has treated the complainant in a cruel or inhuman manner or that he has committed any violence on her person which did therefore endanger her health or life, or that his conduct was such as should generate in the mind of the complainant any apprehension of violence to her person. The respondent denies that he drinks heavily or has a violent temper, or that he is an unsuitable person to have the custody, and care and control of the said minor children; and the respondent and cross-complainant admits that he is an able-bodied man, but denies that the complainant has no visible means of support for in that she is the owner of valuable city lots and buildings; and that she has an income from the said buildings; and that her conduct

has been such, that as a matter of right and justice, she should not be entitled to any alimony for herself, or the custody of the minor children.

And now, having fully answered the bill of complaint exhibited against him, the said respondent prays that this answer be deemed and taken as a cross-bill, and he alleges:

FIRST: The respondent and cross-complainant avers that both he and the complainant and cross-respondent are residents citizens of Baldwin County, Alabama, and that each of them is over the age of twenty-one years, and that they have constantly so resided in the State of Alabama, for more than three years next preceding the filing of these proceedings.

SECOND: That the respondent and cross-complainant avers that he and the said Bessie B. Long were married in Baldwin County, Alabama, on to-wit, the 26th day of December, 1915.

THIRD: The respondent avers that the said Bessie B. Long has been guilty of adulterous intercourse with one Mr. Drinkard, whose name is otherwise unknown, and one Wheeler McCoy; and other various and sundry men, too numerous to mention, in divers places and at divers times; and that her conduct in this respect has not been condoned by the respondent and cross-complainant; and that this conduct on her part was without any connivance or consent on his part.

FOURTH: The respondent and cross-complainant further avers that the complainant and cross-respondent is a woman of irritable and nervous temperament and who on various occasions has made felonious assaults upon the respondent and cross-complainant with deadly weapons and has severely cut and injured him; and that owing to her nervous and irritable disposition she is no suitable person to have the care and custody of the said minor children who were born to the union of the parties to this cause; and that most of the children have attained the age and the intelligence sufficient to select their own custodian and that these children desire to live with their father; and that the custody should, as a matter of fact, be entrusted to him rather than to the complainant and cross-respondent.

FIFTH: The respondent and cross-complainant avers that the names and ages of the children born to the union of the parties to this suit

377

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

Comes your complainant, BESSIE B. LONG, and humbly com-
plaining against the defendant, GRADY G. LONG, respectfully repre-
sents and shows unto your Honor as follows:

FIRST:

That your complainant and the defendant are both over the
age of twenty-one years and are residents of Perdido, Baldwin County,
Alabama, and have been for more than three (3) years next preceding
the filing of this bill of complaint.

SECOND:

That your complainant and the defendant were married on
December 26, 1915, at Perdido, in Baldwin County, Alabama, and lived
together as husband and wife until, to-wit, October 23, 1937.

THIRD:

That on, to-wit, October 23rd and 24th, 1937, the defend-
ant cursed, abused and threatened the complainant and on several
occasions, including October 23rd and 24th, 1937, committed actual
violence on her person, which necessarily endangered her life and
health, and on numerous occasions prior thereto the conduct of the
defendant, Grady G. Long, generated in your complainant a reason-
able apprehension of violence to her person attended with danger
to life or health.

FOURTH:

That the complainant and respondent have five (5) minor
children, namely, Jessie Mae Long, twenty years of age; Grady G.
Long, Jr., eighteen years of age; Mary Lee Long, fourteen years of
age; Mose J. Long, thirteen years of age; Roy Long, seven years of
age. That the respondent drinks heavily and has a violent temper
and is not a suitable person to have the custody, care and control
of the said minor children.

each and every allegation contained in the foregoing bill of complaint, paragraphs FIRST to FIFTH inclusive, but not under oath, oath being hereby expressly waived.

Beebe Hall & Beebe
Solicitors for Complainant.

Small

RECORDED 7-332

BESSIE B. LONG,
Complainant,

vs.

GRADY G. LONG,
Respondent.

ANSWER AND CROSS-BILL.

Filed Nov 19 1937

*Richard
Reynolds*

BESSIE B. LONG,
 Complainant,
 vs.
 GRADY G. LONG,
 Respondent.

IN THE CIRCUIT COURT
 OF BALDWIN COUNTY,
 ALABAMA.

IN EQUITY NO. 377.

Solicitors for Grady G. Long,
 HOME & HODNETTE
 Answer and Cross-Bill.

Solicitors for Grady G. Long,
 HOME & HODNETTE

Filed November 19, 1937
W. S. Dancy, Register

answered, and he will ever pray, etc.
 further and hereby refers to which he may be entitled, premises con-
 so desire. The respondent and cross-complainant prays for such order
 to this cause and will stand to him the right to which he may be
 long, the custody of the minor children born to the union of the parties
 and the said Grady G. Long, and will stand to him, the said Grady G.
 divorce from the bonds of matrimony heretofore existing between him
 hearing of this cause, your honor will stand to him a full and complete
 practices of this honorable court, and he prays that on the trial
 cross-bill, and be required to answer this cross-bill under the rules and
 prays that the said Grady G. Long, be made a party respondent to this
 the premises considered, the respondent and cross-complainant

PRAYERS FOR DIVORCE AND BILLS:

long, a boy, seven years of age.
 teen years of age; one of long, a boy, thirteen years of age; boy
 long, a boy, thirteen years of age; girl five long, a girl, four-
 are as follows: Grady G. Long, a girl twenty years of age; Grady G.

ORIGINAL

Book

RECORDED

7-226

SERVE ON

Circuit Court of Baldwin County
IN EQUITY

No. 377

SUMMONS

GRADY G. LONG

vs.

ESSIE LONG

BEEBE, HALL & BEEBE,

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this _____

day of _____ 193__

SHERIFF

Executed this 13th day of Nov 1937

by leaving a copy of the within Summons with

Grady G. Long
Defendant

M. H. Williams
Sheriff

By *John P. Beane*
Deputy Sheriff