

NO. 34

NO. 1000000000

Vonelle S. Ward,

vs.

Hayward Ward,

Filed April 2, 1934
W. A. Moore
Register.

Filed April, 2, 1934.

HENRY D. MOORER

ATTORNEY AT LAW

BAY MINETTE, ALA.

NO. 34

1924

WILLIAM S. TARD

VS

HAYWARD TARD

(DIVORCE)

*Filed April 2nd 1924
Wm. S. Stone
Register*

HENRY D. MOORER
ATTORNEY AT LAW
BAY MINETTE, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

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

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

Your oratrix, Voncile S. Ward, respectfully represents and shows unto your Honor as follows:

FIRST:

That she is a bona fide resident citizen of Baldwin County, Alabama, residing at Bay Minette, Alabama, and has resided in Baldwin County, Alabama, for more than three years next preceeding the filing of this bill; that she is over the age of twenty-one years.

SECOND:

That Haywood Ward is a resident citizen of Monroe County, residing at Frisco City, Alabama; that he has resided in Monroe County, Alabama for more than three years next preceeding the filing of this bill; that he is over the age of twenty-one years.

THIRD:

That Your Oratrix and the said Haywood Ward were lawfully married, on to-wit:- During the month of September, 1930, and lived together as husband and wife until, to-wit:- March, 1932, at which time the said Haywood Ward threatened to kill your Petitioner, and from such threats Your Petitioner had reasonable apprehension of such violance as to endanger her life and health.

THE PREMISES CONSIDERED, Your Oratrix, respectfully prays that the said Haywood Ward be made party respondent to this bill of complaint by the usual process of this Honorable Court; that such orders, decrees and publications be made as necessary to perfect services on the said Haywood Ward, and that he be required to demur, plead to or answer the same within the

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

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

Your Oratrix, Voncile S. Ward, of Bay Minette,
Alabama, respectfully represents and shows unto your Honor
as follows:

FIRST:

That she is a boni fide resident of Baldwin County,
Alabama, having resided in said county for more than three years
next, preceeding the filing of this bill, and is over the age of
twenty-one years.

SECOND:

That Hayward Ward is over the age of twenty-one
years and resides at Frisco City, Alabama.

THIRD:

That your Oratrix and the said Hayward Ward
were lawfully married during September, 1930, and lived together
untill March 26th, 1932, to-wit; at which time the said Hayward
Ward voluntarily abandoned your Oratrix and has not lived with
her since; that it was no fault of your Oratrix that the said
Hayward Ward abandoned her.

PRAYER FOR PROCESS:

The Premises Considered, your Oratrix respectfully
prays that the said Hayward Ward be made party respondent to
this bill of complaint by the usual process of this Honorable
Court; that such orders, decrees and publications be made in this
case as are necessary to perfect service on the said Hayward
Ward, and that he be required to demur, plead to, or answer
same within the time and under the penalties as provided by law,
or that that the same be forever confessed.

PRAYER FOR RELIEF:

That upon the final hearing of this cause your Honor will grant unto your Oratrix an absolute divorce.

That if your Oratrix is mistaken in the relief prayed for then your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled, she will ever pray, etc.

Yonice S. Ward.
Henry D. Moorer,

Attorney for Complainant.

FOOT NOTE:

Defendant is required to answer each and every allegation contained in the foregoing bill, paragraphs one to three, inclusive, but not under oath, answer under oath being hereby expressly waived.

Yonice S. Ward.
Henry D. Moorer,

Attorney for Complainant.

.....
.....
Voncile Ward,
.....
vs.
.....
Haywood Ward,
.....
.....

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,
~~Answer-er-....~~ Deposition, Note of Testimony,

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.....
.....
.....

and in behalf of Defendant upon Waiver of service,

.....
.....

M. A. Stone
Register.

vacation.

Dated this 30 day of March, 1934.

Haywood Ward

ATTEST:

Henry D. ...
.....

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

Voncie Ward

VS.

Hayward Ward

PLAINTIFF

DEFENDANT

BILL OF COST

Fees of Register		Dollars	Cts.	AMOUNT BROUGHT FORWARD		\$	Cts.
Filing each bill and other papers	3	\$	30	For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.		8	00
Issuing each Subpoena				Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.			
Issuing each copy thereof				Each Notice Sent by Mail to Creditors	15		
Entering each return thereof				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				Making Final Record, per hundred words	15		
Entering each return thereof				Certified Copy of Decree	1 00	1	50
Issuing Writ of Attachment	1	00		Report of Divorce to State Health Office Acts 1915	50	1	00
Entering each return thereof				Total Fees of Register		11	00
Docketing each case	1	00	1 00	FEEES OF SHERIFF			
Entering each Appearance			25	Serving and Returning Subpoena on Deft.	\$1 50		
Issuing each Decree Pro Confesso on personal service	1	00		Serving and Returning Subpoena for Witness	65		
Issuing each Decree Pro Confesso on publication	1	00		Levying Attachment	3 00		
Each Order Appointing Guardian	1	00		Entering and Returing same	25		
Any other order by Register				Entering and Returning Execution	25		
Issuing Commission to Take Testimony				Selling Property Attached	25		
Receiving and Filing				Impaneling Jury	75		
Endorsing each package				Executing Writ of Possession	2.50		
Entering Order Submitting Cause				Collecting Execution for Costs	1.50		
Entering any other Order of Court				Serving and Returning Sci. Fa., each	65		
Noting all Testimony				Serving and Returning Notice	65		
Abstract of Cause, etc.	1	00		Serving and Returning Writ of Injunction	1.50		
Entering each Decree				Serving and Returning Writ of Exeat	1.50		
For Every Hundred Words Over Five Hundred				Taking and Approving Bonds, each	1.00		
Taking Account on Reference	3	00		Collecting Money on Execution			
Taking Testimony, etc.				Making Deed	2.50		
Each Report, Five Hundred Words or less	2	50	5 00	Serving and Returning Application	1.00		
For every Hundred Words Over Five Hundred				Serving Attachment, Contempt of Court	1.50		
Amount Claimed, Less than Five Hundred Dollars, etc.	2	00		TOTAL FEES OF SHERIFF			
Issuing each Subpoena				Recapitulation			
Witness Certificate, each				Register's Fees			
Issuing Execution, each				Sheriff's Fees		11	00
Entering each Return				Commissioner's Fees			
Taking and Approving Bond, each	1	00		Solicitor's Fees			
Making Copy of Bill, etc.				Witness Fees			
Each notice not otherwise provided for				Guardian Ad Litem			
Each Certificate or Affidavit, with Seal				Printer's Fees			
Each Certificate or Affidavit, no Seal				Trial Tax	3 00		
Hearing and passing on application for Receiver or Trustee	3	00		Recording Decree in Probate Court		3	00
Each Settlement with Receiver or Trustee	3	00		Total		14	00
Examining each Voucher of Receiver or Trustee							
Examining each Answer on Exception	3	00					
Recording Resignation or Suggestion of Death of Trustee	75						
Entering each Certificate to Supreme Court							
Taking Questions and Answers, etc.							
For all other service relating to such proceedings	1	00					
For service in proceeding to relieve minors, etc. same fee as in similar cases.							
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.							
Sub Total Carried Forward			8 70				

Received payment this _____ day of _____ 193_____

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs.

Register.

The State of Alabama }
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

Voncile S. Ward

COMPLAINANT

VS.

Hayward Ward

RESPONDENT

I, M. A. Stone,

as Register and Commissioner of Baldwin County Equity Court

have called and caused to come before me Voncile S. Ward, and J. N. Skipper

witness ~~es~~ named in the requirement for Oral Examination, on the 30th day of March

~~1934~~, at the office of Frisco City

in _____, Alabama, and having first sworn said witness ~~es~~ to speak the

truth, the whole truth, and nothing but the truth, the said Voncile S. Ward,

doth depose and say as follows:

Testimony of Voncile S. Ward:

My name is Voncile S. Ward. I am over the age of 21 years and have lived in Baldwin County for more than the last three preceeding years. I reside at Bay Minette, Baldwin County, Alabama. Hayward Ward is my husband. We were married during the month of September, 1930, and lived together as man and wife until March 20th, 1932, at which time Hayward Ward voluntarily abandoned me and has not lived with me since. It was not my fault that the said Hayward Ward left me. I am the complainant in this suit. Hayward Ward is over 21 years of age and live at Frisco City, Monroe County, Alabama,

Voncile S. Ward

ORAL EXAMINATION

I, M. A. Stone, as Register and Commissioner hereby certify that the foregoing deposition s on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and Henry D. Moorer at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ... or had proof made before me of the identity of said witness es; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 2nd day of April 1934.

M. A. Stone (L. S.)

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No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

VS.

RESPONDENT

ORAL DEPOSITION

Filed April 2nd, 1934

M. A. Stone, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

Testimony of J. N. Skipper:

My name is J. N. Skipper. I am the father of Voncile S. Ward. She has lived with me at Bay Minette Alabama for the past three years. She is over 21 years of age Hayward Ward is over 21 years of age and live at Frisco City, Monroe County, Alabama. ~~Hayward~~ Hayward Ward voluntarily abandoned my daughter Voncile ward on March 20th, 1932. They were married during September 1930.

J. N. Skipper