

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

JAMES McCONNICO by this his bill of complaint presented  
against GENEVA D. McCONNICO, respectfully shows:

FIRST: That he and the said Geneva D. McConnico are  
now and have been for more than nine years next prior to this  
date bona fide residents of the County of Baldwin, Alabama and  
over the age of twenty one years.

SECOND: That Complainant and Geneva D. McConnico were  
lawfully married in Bay Minette, Alabama in the month of September,  
1929 and lived together as husband and wife with several intervals  
of separation up to about the 28th day of December, 1932 when she  
voluntarily left him of her own accord and without justification  
and excuse which separation has continued to the present time  
without any resumption of martial relations;

THIRD: That since she left Complainant said Geneva  
McConnico has been guilty of adultery with some man or men un-  
known to Complainant as shown by the fact that she has recently  
given birth to a child with whose parentage Complainant has no part.

FOURTH: That there was born to this marriage two other  
children, one of whom has since died and the survivors reside with  
their mother near Montrose.

THE PREMISES CONSIDERED, Complainant prays that Geneva  
D. McConnico be made party defendant to this bill and that due  
process issue notifying her 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  
Geneva D. McConnico giving him the right to marry again should he  
so desire and such other further and different relief as to equity  
shall seem meet.

*Collier H. Rinkley*  
Solicitor for Complainant

NOTE: Respondent is required to answer each paragraph of the foregoing bill but not under oath.

Solicitor for Complainant.

**CHANCERY EXECUTION  
BILL OF COSTS**

No. 42

*James M<sup>o</sup> Connico*  
Vs.

Plaintiff

*Geneva D. M<sup>o</sup> Connico*

Defendant

FEES OF REGISTER		Dollars	Cents	Brought Forward	\$	
Filing each bill and other papers	\$ 10		10		2	90
Issuing each subpoena	50		70	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			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	1 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	75
Issuing Writ of Attachment	1 00			Certified copy of decree	1 00	
Entering each return thereof	15	1 00		Report of divorce to State Health Office (Acts 1915)	50	
Docketing each case	1 00			Total Fees of Register		3 65
Entering each appearance	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	1 00			Levying attachment	3 00	
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.	1 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		3 65
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	3 00
Hearing and passing on application, etc.	3 00			Recording Decree in Probate Court		
Each settlement with receiver, etc.	3 00			Total		6 65
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 90				

**The State of Alabama,**  
Baldwin County.

No. 42

Circuit Court, In Equity Aug Term, 193 4

To Any Sheriff of the State of Alabama—GREETING:

You are hereby commanded, That of the goods and chattels, lands and tenements of

James M<sup>o</sup> Connico Defendant  
you cause to be made the sum of Case Dismissed Dollars,

which Geneva D. M<sup>o</sup> Connico Plaintiff

recovered of \_\_\_\_\_ on the 22 day of Aug 193 4

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of Six and seventy five/100 Dollars,

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

Interest from \_\_\_\_\_ 193 \_\_\_\_\_ to date of collection.

Witness my hand, this 11 day of Sept 193 4  
M. A. Stone, Register.

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NO. 42  
**RECORDED**  
2/24

JAMES MCCONNICO  
Complainant.

VS

GENEVA D. MCCONNICO  
Respondent.

ORIGINAL BILL

*Filed April 19, 1934*

*W. G. Stone*  
*Register*

ELLIOTT G. RICKARBY  
LAWYER  
FAIRHOPE, ALABAMA