ELLA BECK,

Complainant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN CHANCERY

BILL OF COMPLAINT

VS.

WILLIAM M. BECK,

Respondent.

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

PART ONE

Comes now Ella Beck and respectfully shows unto the Court that she is over the age of twenty-one (21) years and a bona fide resident of Baldwin County, Alabama, residing at Foley therein and that the Respondent, William M. Beck is also over the age of twenty-one years and a resident of Foley, Baldwin County, Alabama.

PART TWO

- 1. Your Complainant avers that she was lawfully married to the Respondent, William M. Beck, in Mobile, Alabama, on the 28th day of February, 1936, and that she has resided in Baldwin County, Alabama, ever since said marriage and for many years prior thereto.
- 2. That more than two years next preceding the filing of this bill and on or about the first day of May, 1936, the Respondent voluntarily abandoned your Complainant and has not lived with her since that date.
- 3. That both Complainant and Respondent have been bona fide residents of this state for more than three years next preceding the filing of this bill.

PRAYER FOR PROCESS

Wherefore, Complainant prays that your Honor will cause to be issued the writ of summons of the State of Alabama to the Respondent, William M. Beck, commanding said Respondent to answer, demur or plead to this Bill of Complaint within thirty days from the service thereof and to abide such order and decree as may be

entered herein; and your Complainant will ever pray &/c.

PRAYER FOR RELIEF

Complainant further prays that upon the final hearing of this action, your Honor will grant to her an absolute divorce from the Respondent and that she may have such other and further relief as may be just and equitable.

Solicitor for Complainant

FOOTNOTE

The Respondent, William M. Beck, is hereby required to answer to answer the allegations of part Two of the foregoing Bill of Complaint from paragraphs numbered One to Paragraph numbered Three, inclusive, but not under oath, oath to answer being hereby expressly waived.

Solicitor for Complainant

ELLA BECK,

Complainant,

VOLUNTARY APPEARANCE AND WAIVER OF SUMMONS

WILLIAM M. BECK,

Respondent.

Comes now, William M. Beck, the above named Respondent and enters his voluntary appearance in the above entitled cause and expressly waives issuance and service of summons.

Dated this 26th day of September, 1938.

Respondent

IN PRESENCE OF

CHANCERY EXECUTION

BILL OF COSTS

Vs. William Beck Plaintiff

					Defer	ıdant
FEES OF REGISTER	Dellar	Ce	nts	Brought Forward	5	<u>}}</u>
Filing each bill and other papers\$ 10	ļ	6-	` <i>\</i>	For Receiving, keeping and paying		
Issuing each subpoena 50	,	1 -	0	out or distributing money, etc.; 1st		
Issuing each copy thereof		4		\$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,-		
For each order of publication 1 00				000 and not exceeding \$10,000, 1-2		
Issuing writ of injunction 1 50				of 1%, all over \$10,000 1-4 of 1%.		
For each copy thereof 50	}		Ì	Receiving, keeping and paying out		
Entering each return thereof 15 Issuing Writ of Attachment 1 00				money paid into court, etc., $\overline{1}$ -2 of 1% of amount received.		ļ
Entering each return thereof 15				Each notice sent by mail to creditor 1	5	
Docketing each case 1 00		0	0	Filing, receipting for and docketing	_ •	
Entering each appearance 25 Issuing each decree pro confesso on			ļ	each claim, etc. 2 For all entries on subpoena docket,	Э	
per. ser 1 00				etc. 5)	
Issuing each decree pro confesso on				For all entries on commission docket,		
publication				etc. 5 Making final record, per 100 words 1		
Any other order by Register 50					2	10
Issuing commission to take testimony 50			Ì	Report of divorce to State Health	.	7
Receiving and filing 10 Endorsing each package 10				Office	}	
Entering order submitting cause 50				Total Fees of Register		-
Entering any other order of court 25	1	2		FEES OF SHERIFF	9	13
Noting all testimony 50		•	7.		1	+
Abstract of cause, etc			- '	Serving and returning subpoena on deft\$1 50	1	60
For every 100 words over 500 15			1	Serving and returning subpoena for		
Taking account, etc. 3 00	ŀ			_ witness 65		
Taking testimony, etc. 15 Each report, 500 words or less 2 50				Levying attachment 3 00 Entering and returning same 2]
For every 100 words over 500 15	ĺ			Entering and returning same	[
Amount claimed less than \$500, etc 2 00				Impaneling Jury	;[
Issuing each subpoena		,	- 1	Executing writ of possession 2 50		100
Issuing execution, each	j	2,	-	Collecting execution for costs		P
Entering each return 15		S	-1	Serving and returning notice 65	!	
Taking and approving bond, each 1 00 Making copy of bill, etc. 15				Serving and returning writ of injunc-		•
Each notice not otherwise provided for 50	4	ر	٠ :	tion 1 50 Serving and returning writ of exeat 1 50		
Each certificate or affidavit, with seal 50	(Taking and approving bonds, each 75		
Each certificate or affidavit, no seal			(Collecting money on execution 2 50		
Each settlement with receiver, etc. 3 00			4	Serving and returning application,		
Exam'ing each voucher of Receiver, etc. 10				etc. 1 00		
Examining each answer, etc			1	Serving attachment, contempt of		
Entering each cert. to Supreme Court 50				court 1 50	<u></u>	L ,
Taking questions and answers, etc. 25				Total Fees of Sheriff	\ \	00
For all other ser. relating to such proceedings			Ι,	RECAPITULATION	15	01
For services in proceeding to relieve			1	Register's Fees Sheriff's Fees	1	
minors, etc., same fee as in similar			(Commissioner's Fees	المحد [0
cases. Commission on sales, etc.: 1st \$100, 2 per				Solicitor's Fees		
ct.; all over \$100 and not exceeding			- 12	Witness Fees Guardian Ad Litem		
\$1,000, $1\frac{1}{2}$ per ct.; all over \$1.000.			j	Printer's Fees		
an dnot exceeding \$20,000, 1 per ct.;			- 1'.	Trial Tax 3 00	5	00
all over \$20,000, ¼ of 1 per ct.	ĺ			Recording Decree in Probate Court	3	
Sub Total Carried Forward				Total	14	03
The State of Alabama, \	No.	Ø®e•			/	
Baldwin County. Circuit Court, In Equity Term, 194						
To Any Sheriff of the State of Alabama-G	REET	INC	iŞ:			
You are hereby commanded, That of the	good	s ar	d c	chattels, lands and tenements of		
	La	, 1 k	V	Defe Defe	ndani	t-
you cause to be made the sum of		•				
					- Doll	ars,
which				PI	aintiff	Ì
recovered of	_on t	he_		30 day of	194	
				•		
by the judgment of our Circuit Court, held for	ine co	unt:	у о •			
	17	Q	<u>د</u>		Doll	ars,
costs of suit, and have the same to render to	the sa	aid_		Oranuch		· · ·
and make return of this Writ and the execution	n ther	eof.	, ac	ecording to law.		 .
Interest from	194_	1	to 1	date of collection		
Witness my hand, this day of						
•/-			人	R R	egiste:	r.

ELLA BECK

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ILLIAM M. BECK

espondent

CLUNTARY APPEARANCE AND WAIVER

By Laddie Henry County

LLOYD A. MAGNEY Attorney Foley, Alabama.