

(497)

GRADY G. LONG, :
 COMPLAINANT :
 :
VS. :
 :
BESSIE B. LONG, :
 DEPENDANT. :
 :

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

IN EQUITY.

TO HONORABLE FRANCIS W. HARE, JUDGE OF THE
TWENTY FIRST JUDICIAL CIRCUIT OF ALABAMA, SITTING IN EQUITY:

Now comes your orator, Grady G. Long, humbly com-
plaining of the defendant Bessie B. Long, in a matter of
divorce a mensa et thoro, as will hereinafter appear, and
represents and shows unto Your Honor as follows:

FIRST.

That both the defendant and your orator are
over the age of twenty one years and are both bona fide
residents of the County of Baldwin, State of Alabama and
have so resided for more than one year immediately preced-
ing the filing of this Bill of Complaint.

SECOND.

That Your orator and the defendant were married
to each other on the 26th day of December, 1915 in Baldwin
County, Alabama, and lived together thereafter as man and
wife until on, to-wit, the 15th day of October, 1938.

THIRD.

That for a long time, from to-wit, the 1st day
of January, 1936 the defendant has treated your orator in
a cruel and inhuman manner, that she has abused and cursed
him and has made many assaults upon his person attended with
grave danger to his life and health. That the defendant is
a woman of extremely high temper and that in her rages and
fits of temper she has attempted to kill Your Orator; that
on, to-wit, the 15th day of October, 1938, while the defendant
was living with Your Orator as his wife she assaulted him with
a deadly weapon, to-wit, a large pair of scissors, at the same
time threatening to take the life of your orator, and that
your orator made his escape and has not returned to live with
her as her husband. That the assaults of the defendant are
deadly and are fraught with grave danger to the life and
health of your orator, and that your Orator can no longer

with any degree of comfort or safety continue to live with the defendant. That he has not condoned her for her fault, and that these wanton assaults were not caused by any fault on his part.

PRAYER FOR PROCESS

To the end that equity may be had in the premises, Your Orator prays that Bessie B. Long be made party defendant to this Bill of Complaint, and that a summons be issued and served on her, requiring her to plead, answer or demur to the within complaint, within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Premises considered, Your orator prays that on a final hearing of this cause your Honor will make and enter a decree granting to Your orator a divorce from bed and board from this defendant, and your orator prays all other and additional relief to which he may in equity and good conscience be entitled, and your orator will ever pray, etc.

Harve + Madnette
Solicitors for the complainant

FOOTNOTE:

Defendant is required to answer each and every paragraph of the foregoing Bill of Complaint, numbered "FIRST", "SECOND" and "THIRD", but not under oath, answer under oath being hereby expressly waived.

Harve + Madnette
Solicitors for the complainant.

GRADY G. LONG, :
COMPLAINANT AND CROSS RESPONDENT. : IN THE CIRCUIT
VS. : COURT OF BALDWIN
BESSIE B. LONG, : COUNTY, ALABAMA.
DEFENDANT AND CROSS COMPLAINANT. : IN EQUITY. NO. _____

TO THE HONORABLE FRANCIS W. HARE, JUDGE OF THE
TWENTY FIRST JUDICIAL CIRCUIT OF THE STATE OF ALABAMA,
IN EQUITY SITTING.

Now comes the complainant and cross respondent, Grady
G. Long, and files this his answer to the crossbill heretofore
exhibited in this cause by the defendant and cross complainant,
Bessie B. Long, and for answer to said cross bill says as
follows:

FIRST:

That the allegations contained in paragraph "FIFTH" of
the Bill of cross complainant are true and correct.

SECOND:

That the said Grady G. Long denies that he struck the
said Bessie B. Long or drove her away from their mutual home,
but that her leaving was purely voluntary on her part and with-
out any inducement on his part. And that he has not committed
any acts of violence on her person nor threatened to commit
any acts of violence on her person nor refused her access to
her children, except that he has not compelled their children
to go live with her against their wishes.

THIRD:

That the said Grady G. Long the cross respondent de-
nies that he is now or ever has been addicted to drink, that
he manifests violent temper at any time, that he has ever been
or now is a confirmed and habitual drunkard, or that there
has ever been any reasonable apprehension engendered in the
said Bessie B. Long that he would do her any bodily harm.

FOURTH:

The said Grady G. Long denies that he is unsuited
to care for and to be entrusted with the custody of the child-
ren born to the union between the said Grady G. Long and Bessie
B. Long, but asserts that the children live with him now and

PAGE TWO. ANSWER OF GRADY G. LONG TO CROSS BILL OF BESSIE B. LONG.

have lived with him since the separation between himself and the defendant and cross complainant, Bessie B. Long. That he has amply provided for the said children and loves them with the lasting love of a father.

FIFTH:

That the said Grady G. Long does not make the sum of one hundred and fifty dollars per month as alleged in the cross-bill of Bessie B. Long, and does not own any realty worth more than three hundred and fifty dollars and no personalty worth more than three hundred dollars. That he lives in a house furnished to him by his employers and there he has established the home of the children born to the union between himself and the said Bessie B. Long and expends his entire salary in supporting and maintaining the said children in the fashion their position in life entitles them to be maintained. That the said Bessie B. Long, on the other hand owns two parcels of land in Perdido, Alabama, one being six acres of land worth \$250.00 and which bring her a yearly income of about twenty dollars, as farm land, and a house and lot worth about \$500.00 and which brings her a monthly rental of some four or five dollars, and one large business building in the City of Atmore, Alabama, now occupied by T. A. Graham Oil Company and T. A. Graham Beverage Company, and which is worth in excess of Five Thousand dollars, and which brings her an income of some twenty to twenty five dollars per month. That the property in Atmore, Alabama was formerly owned by Grady G. Long and after the building was erected thereon he gave the property to the said Bessie B. Long, and that Bessie B. Long has a large and undeterminable income from the practice of prostitution. That she has only herself to maintain and her income is sufficiently ample for that and that she ought not to be granted any alimony for and on account of her immoral conduct, indecent behavior and libidinous practices.

SIXTH:

The said Grady G. Long denies that Bessie B. Long is a

PAGE THREE: ANSWER OF GRADY G. LONG TO CROSS BILL OF BESSIE
B. LONG.

fit or suitable person to be entrusted with the care or custody of the minor children born to the union of the parties: that since the date of the separation of the parties to this cause of action the children have gone to visit their mother and have found her in bed with another man than her husband, and have found her associating with booze filled libertines at the place where she is now staying. That on many occasions she has committed acts of adultery almost in the presence of her children or some of them, and that she has left men with them to watch over them whilst she consorted with her amours. That the fifteen year old daughter has been humiliated by having to be present while men made indecent proposals to her mother and put their hands about on her person in most vulgar manner.

And now having fully answered the cross bill of the defendant and cross complainant in this case the said Grady G. Long prays that he be permitted to go hence with his costs in this behalf expended.

Horn & Hadnette

Solicitors for the complainant and cross
Respondent Grady G. Long.

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

To the Honorable Francis W. Hare, Judge of the Circuit Court of Baldwin County, Alabama, SITTING IN EQUITY.

Now comes the complainant and cross respondent in the above styled cause and after leave asked and obtained files this, his amended bill of complaint as follows;

Grady G. Long, :
 Complainant and cross respondent, : IN THE CIRCUIT COURT
 vs. : OF BALDWIN COUNTY,
 Bessie B. Long, : ALABAMA. IN EQUITY.
 Defendant and cross complainant. :

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

Now comes your complainant and cross respondent, Grady G. Long, humbly complaining of the respondent and cross complainant, Bessie B. Long, in a matter of divorce as will hereinafter appear, and represents and shows unto Your Honor as follows:

FIRST.

That both the said Grady G. Long and Bessie Long, the parties to this suit are over the age of twenty-one years and both are residents of Baldwin County, Alabama, and have resided in the County of Baldwin for more than one year immediately preceding the filing of this Bill of Complaint.

SECOND

That the parties to this cause of action, to-wit, Grady G. Long and Bessie B. Long were married to each other on the 26th day of December, 1915 in Baldwin County, Alabama, and lived together immediately thereafter as man and wife until on, to-wit; the 15th day of October, 1938.

THIRD.

That there was born to the union of the parties to this cause of action Five children, four of whom are minors, namely, Grady G. Long, Jr. a boy, nineteen years

PAGE TWO. AMENDED COMPLAINT.

Mary Lee Long, a girl, Fifteen years of age; Mose J. Long, a boy, fourteen years of age; and Roy Long, a boy, Eight years of age. That the said Grady G. Long is a kind and considerate father and is in every respect a suitable person to be entrusted with the care and custody of the said children, and that they desire to remain in the custody of the said Grady G. Long; while the said Bessie B. Long is a dissolute and immoral woman, consorting with lewd and lascivious men and women, and is profligate, debauched and abandoned to a life of lustful vice, and is no fit person to be entrusted with the care and custody of the above minors.

FOURTH.

That at divers times and places, too numerous to catalogue the said Bessie B. Long has committed acts of adultery with Needem Huggins, Wheeler McCoy, a Mr. Drinkard, Tom Warwick, Joe Malholovich, Sam Parker and others too numerous to mention. That she has become an open and notorious prostitute all of which was unknown to the said Grady G. Long, with the exception of suspicions concerning the said Wheeler McCoy and Mr. Drinkard. That in her nefarious trade the said Bessie B. Long has utilized the home of the parties and the outbuildings thereto to perpetrate her lewd designs. That the said Grady G. Long has never consented to her conduct, forgiven her for the same, nor connived with her in the commission of her perfidy.

PRAYER FOR PROCESS.

To the end that equity may be had in the premises the said Grady G. Long prays that Bessie B. Long be made party respondent to this amended Bill of Complaint, and that she be required to plead, answer or demur to the within Bill of complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF.

The premises considered, the said Grady G. Long, the complainant and cross respondent prays that on a final

PAGE THREE. AMENDED COMPLAINT.

hearing of this cause Your Honor will make and enter a decree dissolving the bonds of matrimony heretofore existing between the said Grady G. Long and Bessie B. Long and granting to the said Grady G. Long the right to again marry should he so desire; and that in and by virtue of the said decree the said Grady G. Long will be awarded the custody of the minor children, Grady G. Long, Mary Lee Long, Mose J. Long and Roy Long. And the said Grady G. Long prays all such other, further and general relief to which he may be entitled, the premises considered, and he will ever pray, etc.

Horne & Hadnette

SOLICITORS FOR THE COMPLAINANT
AND CROSS RESPONDENT, GRADY G. LONG.

FOOTNOTE:

THE SAID BESSIE B. LONG IS REQUIRED TO ANSWER EACH AND EVERY PARAGRAPH OF THE FOREGOING BILL OF COMPLAINT, NUMBERED "FIRST", "SECOND", "THIRD" AND "FOURTH", BUT NOT UNDER OATH, ANSWER UNDER OATH THERE TO BEING HEREBY EXPRESSLY WAIVED.

Horne & Hadnette

SOLICITORS FOR THE COMPLAINANT AND CROSS
RESPONDENT, GRADY G. LONG.

GRADY G. LONG,
Complainant and
Cross Respondent,

vs.

BESSIE B. LONG,
Defendant and
Cross Complainant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. 497.

DEMURRERS.

Comes the Defendant and Cross Complainant, BESSIE B. LONG, in the above entitled cause, and files herewith Demurrers to the said Amended Bill of Complaint heretofore filed by the said Complainant and Cross Respondent, and as grounds for said Demurrers sets down and assigns the following, separately and severally, to-wit:

FIRST:

That there is no equity in the said Bill.

SECOND:

That the said Bill of Complaint fails to allege sufficient grounds under the law upon which the said Grady G. Long is entitled to a divorce.

THIRD:

That the said allegations in said Bill of Complaint are the conclusion of the pleader.

ANSWER.

and further comes your Defendant and Cross Complainant, BESSIE B. LONG, and without waiving said demurrers herewith filed, and insisting on the same, files this her Amended answer and Cross Bill to the said Bill heretofore filed by the said Complainant and Cross Respondent, and represents and shows unto your Honor as follows, to-wit:

FIRST:

That the said Defendant and Cross Complainant, BESSIE B.

LONG, admits all the allegations of the said Amended Bill of Complaint contained in Paragraphs FIRST and SECOND, and so much of Paragraph THIRD which ends: "and Roy Long, a boy, eight years of age."

SECOND:

That the said Defendant and Cross Complainant denies most emphatically that the said Complainant and Cross Respondent, GRADY G. LONG, is a kind and considerate father and is a suitable person to have the care and custody of the said children; and she further denies that she is a dissolute and immoral woman consorting with lewd and lascivious men and women, and is profligate, debauched and abandoned to a life of lustful vice and is not a fit person to be entrusted with the care and custody of her children, and demands strict proof thereof.

THIRD:

That the said Defendant and Cross Complainant denies most emphatically that she has at divers times and places committed acts of adultery with Needham Huggins, Wheeler McCoy, a Mr. Drinkard, Tom Warwick, Joe Malholovich, Sam Parker, or any other man or men, and she further denies most emphatically that she has become an open and notorious prostitute; and she further denies without reservation that she has used the homes of the said parties to commit such acts and demands strict proof thereof.

AMENDMENT TO CROSS BILL.

And said Defendant and Cross Complainant, BESSIE B. LONG, begs leave of this Honorable Court to amend her said Cross Bill heretofore filed under date of November 9th, 1938, by adding the following Counts:

EIGHTH:

That the said Complainant and Cross Respondent, GRADY G. LONG, did commit adultery with a woman by the name of Elizabeth McGill on, to-wit, in December, 1937, and at various other times and places the said Grady G. Long did commit adulterous acts with

the said Elizabeth McGill.

NINTH:

That the said Complainant and Cross Respondent, GRADY G. LONG, did commit adultery with a woman by the name of Vernie Hadley on, to-wit, October 15, 1938, and that he did at various other times too numerous to mention commit the said adulterous acts with the said Vernie Hadley.

TENTH:

That your Defendant and Cross Complainant, BESSIE B. LONG, has not condoned in, neither has she forgiven the said Grady G. Long for his adulterous acts with the said woman.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, the said BESSIE B. LONG prays that your Honor will by proper process make the said GRADY G. LONG a party to this Amended Answer and Cross Bill, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court. And the said BESSIE B. LONG further prays that your Honor will order a reference to determine a reasonable alimony pendente lite to be paid by the said Complainant and Cross Respondent, GRADY G. LONG, to the benefit of your Defendant and Cross Complainant, and at said reference there shall be determined a reasonable attorney's fee in the premises.

PRAYER FOR RELIEF.

WHEREFORE, the said Defendant and Cross Complainant prays that your Honor will enter an order and decree awarding to her the complete care, custody and control over the said Roy Long, a minor son, and that your Honor will further enter an order and decree awarding to her and to her minor son separate maintenance from the said Complainant and Cross Respondent, to be paid by him monthly out of his income for the support of your Defendant and Cross Complainant and her said minor son; and that your Honor will further

enter an order and decree awarding to her a reasonable attorney's fee in the premises, to be paid by the said Complainant and Cross Respondent, and your said Defendant and Cross Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive; and as in duty bound she will ever pray.

Beebe Hall & Beebe
Solicitors for Defendant and
Cross Complainant.

FOOT NOTE:

The said Complainant and Cross Respondent, GRADY G. LONG, is required to answer each and every allegation in the foregoing Amended Answer and Cross Bill, Paragraphs EIGHTH to TENTH inclusive, but not under oath, oath being hereby expressly waived.

Beebe Hall & Beebe
Solicitors for Defendant and
Cross Complainant.

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

BESSIE B. LONG

BESSIE B. 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

GRADY G. LONG

against said BESSIE B. 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, R. S. Duck, Register of said Circuit Court, this 31st day of October, 1938.

R. S. DUCK

, Register

BY:

Haulie Chapman

Deputy

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

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

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. 497.

DEMURRERS.

Comes the defendant, BESSIE B. LONG, in the above entitled cause, and files this her Demurrers to the Bill of Complaint heretofore filed by the said complainant, GRADY G. LONG, and as grounds for said demurrers sets down and assigns the following, separately and severally, as follows, to-wit:

FIRST:

That there is no equity in the bill.

SECOND:

That the said complainant fails to allege in his said Bill of Complaint sufficient grounds under the law upon which he is entitled to a divorce.

ANSWER OF DEFENDANT.

Comes your defendant, the said BESSIE B. LONG, and without waiving said demurrers heretofore filed by her, and insisting on the same, files this her answer to the said Bill of Complaint as follows, to-wit:

FIRST:

That the said defendant admits all of the allegations of the said Bill of Complaint as set out in Paragraph First.

SECOND:

That the said defendant admits all the allegations as set out in Paragraph Second.

THIRD:

That the said defendant denies that on the first day of January, 1936, she treated the said complainant in a cruel and inhuman manner; that she further denies that she has abused and cursed that she him and/has not made any assaults upon his person attended with grave danger to his life and health, and she further denies that on the 15th day of October, 1938, she assaulted the said complainant with a deadly weapon, threatening to take his life, and the said defendant denies each and every allegation as set out in Paragraph Third of the said bill of complaint and demands strict proof thereof.

FOURTH:

Said defendant, Bessie B. Long, respectfully prays that this her answer may be taken as a Cross Bill in said cause, and alleges that the said Grady G. Long committed actual violence on her person which was attended with danger to her life and health, and that the said Grady G. Long's conduct was such that there was reasonable apprehension to believe that he would commit actual violence to her person and that the said Grady G. Long on October 15, 1938, assaulted her by striking her with his fist and driving her from their home, and that she has not been allowed to return to her said home nor care for her children.

FIFTH:

That there were born to the said union five (5) children, namely, Jessie Mae Long, who is now twenty-one (21) years of age; Grady G. Long, Jr., who is now nineteen (19) years of age; Mary Lee Long, who is fifteen (15) years of age; Mose J. Long, who is fourteen (14) years of age, and Roy Long, who is nine (9) years of age; all of whom are now in the custody of the said Grady G. Long.

SIXTH:

That the said Grady G. Long became addicted to habitual drunkenness after marriage, and when under the influence of strong drink, has a violent and ungovernable temper; that he is not a suit-

able person to have the custody and control over the said Roy Long, a minor of tender years of age.

SEVENTH:

That the said Grady G. Long is at present employed by the L. & N. Railroad, with a salary in excess of One Hundred Fifty Dollars (\$150.00) a month, and that he owns real and personal property in his own name of the value of between \$5,000.00 and \$6,000.00; that the said Bessie B. Long is a frail and sickly woman who is not physically able to earn her own living for herself and minor child, and owns no property which has any appreciable net income, neither has the said Bessie B. Long sufficient means with which she may employ counsel.

PRAYER FOR PROCESS.

WHEREFORE, the premises considered, the said Bessie B. Long prays that your Honor will by proper process make the said Grady G. Long a party to this Answer and Cross Bill, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court, and the said Bessie B. Long further prays that your Honor will order a reference to determine a reasonable alimony pendente lite to be paid by the said Grady G. Long to the said Bessie B. Long, and also a reasonable attorney's fee in the premises.

PRAYER FOR RELIEF.

WHEREFORE, the said Bessie B. Long prays that your Honor will give and grant unto her separate maintenance from the said Grady G. Long, to be paid by him monthly, and that your Honor will enter a further order and decree awarding to her the custody, care and control over the said minor, Roy Long; that your Honor will further enter an order and decree awarding to her a reasonable sum as separate maintenance, to be paid by the said Grady G. Long to her monthly for her and her minor son's maintenance and support; and your Honor will further enter an order and decree awarding to her a reasonable attorney's fee to be paid by the said Grady G. Long. And the

said Bessie B. Long prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive. And as in duty bound she will ever pray.

Beebe Hall & Beebe
Solicitors for Defendant and
Cross Complainant.

FOOT NOTE:

The said Grady G. Long is required to answer each and every allegation contained in the foregoing Answer and Cross Bill, Paragraphs FIRST to SEVENTH inclusive, but not under oath, oath being hereby expressly waived.

Beebe Hall & Beebe
Solicitors for Defendant and
Cross Complainant.

ANSWER.

GRADY G. LONG, :
Complainant and :
Cross Respondent : IN THE CIRCUIT COURT OF
vs. : BALDWIN COUNTY,
BESSIE B. LONG, : ALABAMA.
Defendant and cross : IN EQUITY.
Complainant. :
NO. 497.

TO HONORABLE FRANCIS W. HARE, JUDGE OF THE TWENTY FIRST
JUDICIAL CIRCUIT OF ALABAMA.

Now comes the Complainant and cross respondent
Grady G. Long and for answer to the amended cross bill
heretofore filed in this cause files this his amended
answer to the same, and represents and shows unto Your
Honor as follows:

FIRST. That the complainant does not know any woman whose
name is Elizabeth McGill and that he has committed no act
of adultery at any time or place with said Elizabeth
McGill.

SECOND: That so far as the complainant Grady G. Long knows
there is no such woman in existence as Vernie Hadley and he
denies that he ever on, to-wit, October 15th, 1938 or at
any other time or place committed any act or acts of adultery
with said Vernie Hadley.

THIRD: That he denies that he has ever engaged in adul-
terous relations with any woman but that on the contrary he
has ever been the dutiful husband.

The cross defendant files this answer without waiving
his demurrers and other pleadings heretofore filed, and now
having fully answered the amended cross complaint the cross
respondent prays that he may go hence with his costs in
this behalf expended.

Harriet Hadnette
HARRIET AND HOBNETTE
SOLICITORS FOR THE
COMPLAINANT AND CROSS
RESPONDENT.

RECORDED

filed

GRADY G. LONG,
Complainant, and
Cross-Respondent.

vs.

BESSIE B. LONG,
Respondent and
Cross-Complainant.

AMENDED BILL OF COMPLAINT.

Filed November 16th, 1938.

R. S. DUCK

clerk, - register

By *Madeline H. Thompson*
Deputy

Executed Nov 17th 1938
by handing a copy of the
within writ to
John Decker as attorney
for Bessie B. Long -

M. H. Wilkins
Shenick

By *B. F. Kussner*
D.S.

(original)

Serve On Bessie B. Long

Circuit Court of Baldwin County
IN EQUITY

No. 497

Summons

GRADY G. LONG
COMPLAINANT

✓
VS.

BESSIE B. LONG
DEFENDANT

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
Baldwin County

Received in office this 31

day of Oct., 1938

Sheriff.

Executed this 31st day of

November, 1938

by leaving a copy of the Summons with

Bessie B. Long

Defendant

Wm. G. Helms
Sheriff

By Bessie B. Long
Deputy Sheriff

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Exhibits

RECORDED
Duch
Final Record #8

DEURER, ANSER &

CROSS-BILL

Filed November 9, 1955
R.S. Duch, Register
By: - Maurice Thompson, Deputy

Executed Nov 12th 1938
by handing a copy to
Gady G. Long
M. H. Wilkins
Sheriff
By John R. Davis
D.S.

RECORDED

Answer to Amended Bill

Filed January 13, 1939
R. S. Dault, Reporter
By - Rankin's Stampers,
Deputy