

BILL OF COMPLAINT

LILLIE BELL COVINGTON)) IN THE CIRCUIT COURT OF BALDWIN COUNTY,
Complainant)	
-vs-)	
GEORGE COVINGTON)	ALABAMA
Respondent.)	IN EQUITY.

TO THE HONORABLE F. W. HARE, Judge of the Circuit Court of Baldwin County, Alabama, in Equity:

Comes your Complainant Lillie Bell Covington and presents this her bill of complaint against George Covington and shows unto your Honor as follows:

FIRST: Your Complainant and the Respondent, George Covington, are both over the age of twenty-one years and your Complainant and the Respondent are both bona fide residents of the State of Alabama, the Respondent now residing at Coffeeville, Alabama and the Complainant in Baldwin County.

SECOND: Your Complainant and the said George Covington were lawfully married at Chechtow Bluff, Monroe County, Alabama on the day of _____ and lived together as man and wife until on or about September 1936 and further that there were no children born of the said marriage.

THIRD: Your Complainant further shows unto your Honor that during the month of September 1936 your Respondent did voluntarily and without any cause or fault on the part of your Complainant desert your Complainant and which offense she has not condoned and she will not condone and that he has never returned to your Complainant nor co-habited with her as husband and wife from the month of September 1936 to the date of the filing of this bill, said abandonment by the Respondent continuing for more than two years next preceding the filing of this bill.

PRAYER FOR PROCESS

THE PREMISES CONSIDERED, Complainant prays that the said George Covington be made a party to the bill of complaint, that he be brought into Court by personal service or any method approved and adopted by this Honorable Court directing him to plead, answer or demur to the allegations as set out against him in the said bill of complaint as filed in this cause in all respects as

required under law and rules of this Honorable Court.

PRAYER FOR RELIEF

And your Complainant prays that upon the final hearing of this cause that this Honorable Court will grant to her an absolute divorce dissolving entirely the bonds of matrimony now existing between her and the said George Covington and granting her the right to marry again should she so desire and your complainant prays for such other and further relief as in equity and good conscience she may be entitled to in the premises, for which she will ever pray.

Carrie M. Brown, et al.
for Complainant

FOOTNOTE: The Respondent is required to answer but not under oath the same being expressly waived, as to each and every paragraph of the foregoing complaint numbering from one to three both inclusive.

Carrie M. Brown, et al.
for Complainant

ANSWER AND WAIVER

LILLIE BELL COVINGTON,)

Complainant)

-vs-

GEORGE COVINGTON,)
Respondent.)

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

Comes the Respondent in the above styled cause and for answer to the complaint filed therein says as follows:

FIRST: The Respondent admits the allegations contained in Paragraph one.

SECOND: The Respondent admits the allegations contained in Paragraph two.

THIRD: Respondent denies each and every allegation contained in Paragraph Three.

The respondent waives notice of time of and the taking of testimony in this cause as well as other proceedings.

The Respondent asks that he be given the right to marry again upon the final decree of this cause should he so desire.

WITNESS:

D. A. Jones
Oriskany Howell

X George J. Covington
Respondent.

NOTE: I hereby accept service of the bill of complaint in the above styled cause, dated 10-28-1938.

X George J. Covington
Respondent.

CHANCERY EXECUTION

BILL OF COSTS

498 *Lillie Bell* vs *Geo Coughlin*
 No. *Coungton* Plaintiff
 Defendant

FEES OF REGISTER		Dollars	Cents		
Filing each bill and other papers	\$ 10			Brought Forward	8 55
Issuing each subpoena	50	50		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
Issuing Writ of Attachment	1 00			Certified copy of decree	1 00
Entering each return thereof	15			Report of divorce to State Health Office	50
Docketing each case	1 00	1 00		(Acts 1915)	
Entering each appearance	25			Total Fees of Register	8 55
Issuing each decree pro confesso on per. ser.	1 00			FEES OF SHERIFF	
Issuing each decree pro confesso on publication	1 00			Serving and returning subpoena on deft.	1 50
Each order appointing guardian	1 00			Serving and returning subpoena for witness	65
Any other order by Register	50			Levying attachment	3 00
Issuing commission to take testimony	50			Entering and returning same	25
Receiving and filing	10			Selling property attached	
Endorsing each package	10			Impaneling Jury	75
Entering order submitting cause	50	2 1		Executing writ of possession	2 50
Entering any other order of court	25			Collecting execution for costs	1 50
Noting all testimony	50			Serving and returning sci. fa., each	65
Abstract of cause, etc.	1 00			Serving and returning notice	65
Entering each decree	75			Serving and returning writ of injunction	1 50
For every 100 words over 500	15			Serving and returning writ of exeat.	1 50
Taking account, etc.	3 00			Taking and approving bonds, each	75
Taking testimony, etc.	15			Collecting money on execution	
Each report, 500 words or less	2 50			Making deed	2 50
For every 100 words over 500	15			Serving and returning application, etc.	1 00
Amount claimed less than \$500, etc.	2 00			Serving attachment, contempt of court	1 50
Issuing each subpoena	25			Total Fees of Sheriff	3 00
Witness certificate, each	25			RECAPITULATION	
Issuing execution, each	75			Register's Fees	8 55
Entering each return	15			Sheriff's Fees	3 00
Taking and approving bond, each	1 00			Commissioner's Fees	
Making copy of bill, etc.	15			Solicitor's Fees	
Each notice not otherwise provided for	50			Witness Fees	
Each certificate or affidavit, with seal	50			Guardian Ad Litem	
Each certificate or affidavit, no seal	25			Printer's Fees	
Hearing and passing on application, etc.	3 00			Trial Tax	3 00
Each settlement with receiver, etc.	3 00			Recording Decree in Probate Court	
Exam'ing each voucher of Receiver, etc.	10			Total	14 55
Examining each answer, etc.	3 00				
Recording resignation, etc.	75				
Entering each cert. 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					

The State of Alabama, } No.
 Baldwin County. } Circuit Court, In Equity Term, 1941

To Any Sheriff of the State of Alabama—GREETINGS:
 You are hereby commanded That of the goods and chattels, lands and tenements of Lillie Bell Coungton Defendant.....

you cause to be made the sum of _____ Dollars,
 which _____ Plaintiff.....

recovered of Care Demand on the 29 day of Sept 1941

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of 14 55 Dollars,

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

Interest from 29th 1941 to date of collection.

Witness my hand, this 29th day of Sept 1941
Reduct, Register.

RECORDED
IN EQUITY

ELLIE BELL COVINGTON,
Complainant

vs

GEORGE COVINGTON,
respondent.

ANSWER AND WAIVER.

Filed November 11, 1928

R. S. DODD

clerk, - register

Deputy

By Arthur H. Hays

Orvis M. Brown, Attorney for
Plaintiff.

[Faint signature]

[Faint signature]

[Faint signature]

to grant the relief sought in this bill of complaint.

WHEREFORE I pray

that you will grant the relief sought in this bill of complaint.

And I pray that this bill of complaint be granted and that the

relief sought in this bill of complaint be granted and that the

relief sought in this bill of complaint be granted and that the

relief sought in this bill of complaint be granted and that the

relief sought in this bill of complaint be granted and that the

IN EQUITY RECORDED

LILLIE BELL COVINGTON,
Complainant

vs

GEORGE COVINGTON,
Respondent

C O M P L A I N T

Filed November 1, 1935
R. S. DUCK
clerk, register
By *Orvis M. Brown*
Deputy

Orvis M. Brown, Attorney for
Plaintiff