

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA:

Comes your complainant, RALPH G. NELSON, and humbly com-  
plaining against VIRGINIA LOWELL NELSON, respectfully shows and rep-  
resents unto your Honor as follows:

FIRST:

That your complainant and the respondent are both over  
the age of twenty-one (21) years and are residents of Baldwin County,  
Alabama.

SECOND:

That your complainant and the respondent were married in  
Pensacola, Florida, in July of 1936 and lived together as husband  
and wife until the 14th day of October, 1938.

THIRD:

That there were no children born to this union.

FOURTH:

That on, to-wit, October 14th, 1938, the respondent,  
Virginia Lowell Nelson, left the home of your complainant with a  
man by the name of Jemison and remained away with him for two days  
and nights, and the said respondent and the said Jemison committed  
adultery on said occasion, and your complainant did refuse to allow  
the said respondent to return to his home since the said act of adul-  
tery was committed and has not condoned the said acts committed by  
the said respondent; that at the time of the filing of this bill of  
complaint the said respondent is living in adultery with one Franklin.

WHEREFORE, the premises considered, complainant prays that  
your Honor will by proper process make the said Virginia Lowell Nel-  
son party respondent to this bill of complaint, requiring her 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.

Complainant further prays that upon the final hearing of  
this cause your Honor will give and grant unto him a decree of div-

orce, forever barring the bonds of matrimony existing between him and the respondent, and your complainant prays for such other, further, different or general relief as he may in equity and good conscience be entitled to receive. And as in duty bound he will ever pray.

Beebe Hall + Beebe  
Solicitors for Complainant.

FOOT NOTE:

The respondent, VIRGINIA LOWELL NELSON, is required to answer each and every allegation contained in the foregoing bill of complaint, Paragraphs FIRST to FOURTH inclusive, but not under oath, oath being hereby expressly waived.

Beebe Hall + Beebe  
Solicitors for Complainant.

RALPH G. NELSON,

Complainant,

vs.

VIRGINIA LOWELL NELSON,

Defendant.

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

) IN EQUITY.

Comes the defendant, VIRGINIA LOWELL NELSON, and hereby accepts service of the summons and complaint heretofore filed by the complainant, Ralph G. Nelson, and hereby agrees that the said proceeding may be set down for hearing immediately without further notice to her.

The defendant denies each and every allegation alleged in the said bill of complaint and demands strict proof thereof.

Virginia Lowell Nelson  
Defendant.

Witness  
J. E. Perkins

TO THE HON. F. W. HANE, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA:

Comes your complainant, RALPH G. NELSON, and humbly complaining against VIRGINIA LOWELL NELSON, respectfully shows and represents unto your Honor as follows:

FIRST:

That your complainant and the respondent are both over the age of twenty-one (21) years and are residents of Baldwin County, Alabama.

SECOND:

That your complainant and the respondent were married in Pensacola, Florida, in July of 1936 and lived together as husband and wife until the 14th day of October, 1938.

THIRD:

That there were no children born to this union.

FOURTH:

That on, to-wit, October 14th, 1938, the respondent, Virginia Lowell Nelson, left the home of your complainant with a man by the name of Jenison and remained away with him for two days and nights, and the said respondent and the said Jenison committed adultery on said occasion, and your complainant did refuse to allow the said respondent to return to his home since the said act of adultery was committed and has not condoned the said acts committed by the said respondent; that at the time of the filing of this bill of complaint the said respondent is living in adultery with one Franklin.

WHEREFORE, the premises considered, complainant prays that your Honor will by proper process make the said Virginia Lowell Nelson party respondent to this bill of complaint, requiring her 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.

Complainant further prays that upon the final hearing of this cause your Honor will give and grant unto him a decree of div-

orce, forever barring the bonds of matrimony existing between him and the respondent, and your complainant prays for such other, further, different or general relief as he may in equity and good conscience be entitled to receive. And as in duty bound he will ever pray.

Beebe Hall & Beebe  
Solicitors for Complainant.

FOOT NOTE:

The respondent, VIRGINIA LOWELL NELSON, is required to answer each and every allegation contained in the foregoing bill of complaint, Paragraphs FIRST to FOURTH inclusive, but not under oath, oath being hereby expressly waived.

Beebe Hall & Beebe  
Solicitors for Complainant.

0011

BILL OF COMPLAINT

# CHANCERY EXECUTION

## BILL OF COSTS

*Ralph G. Nelson*  
VS.

No. 501

PLAINTIFF

*Virginia Lowell Nelson*

DEFENDANT

FEES OF REGISTER	Dollars	Cents	Brought Forward	\$	Cents
Filing each bill and other papers	\$	10		3	10
Issuing each subpoena		50			
Issuing each copy thereof		40			
Entering each return thereof		15			
For each order of publication	1	00			
Issuing Writ of injunction	1	50			
For each copy thereof		50			
Entering each return thereof		15			
Issuing Writ of Attachment	1	00			
Entering each return thereof		15			
Docketing each case	1	00			
Entering each appearance		25			
Issuing each decree pro confesso on per ser.	1	00			
Issuing each decree pro confesso on publica	1	00			
Each order appointing guardian	1	00			
Any other order by Register		50			
Issuing Commission to take testimony		50			
Receiving and filing		10			
Endorsing each package		10			
Entering order submitting cause		50			
Entering any other order of court		25			
Noting all testimony		50			
Abstract of cause, etc.	1	00			
Entering each decree		75			
For every 100 words over 500		15			
Taking account, etc.		3 00			
Taking testimony, etc		15			
Each report, 500 words or less		2 50			
For every 100 words over 500		15			
Amount claimed less than \$500, etc		2 00			
Issuing each subpoena		25			
Witness certificate, each		25			
Issuing execution, each		75			
Entering each return		15			
Taking and approving bond, each	1	00			
Making copy of bill, etc		15			
Each notice not otherwise provided for		50			
Each certificate or affidavit, with seal		50			
Each certificate or affidavit, no seal		25			
Hearing and passing on application, etc.		3 00			
Each settlement with Receiver, etc.		3 00			
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 cent: all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent					
Sub Total Carried Forward	\$	3 10			
			TOTAL	\$	9 35

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%.

Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.

Each notice sent by mail to creditor 15

Filing receipting for and docketing each claim, etc. 25

For all entries on subpoena docket, etc. 50

For all entries on commission docket, etc. 50

Making final record. per 100 words 15

Certified copy of decree 1 00

Report of divorce to State Health Office (Acts 1915) 50

TOTAL FEES OF REGISTER

FEES OF SHERIFF

Serving and returning subpoena on deft. \$1 50

Serving and returning subpoena for witness 65

Levying attachment 3 00

Entering and returning same 25

Selling property attached 25

Impanelling Jury 75

Executing Writ of possession 2 50

Collecting execution for costs 1 50

Serving and returning sci. fa., each 65

Serving and returning notice 65

Serving and returning writ of injunction 1 50

Serving and returning writ of exeat 1 50

Taking and approving bonds, each 75

Collecting money on execution 2 50

Making Deed 2 50

Serving and returning application, etc. 1 00

Serving attachment, contempt of court 1 50

TOTAL FEES OF SHERIFF

RECAPITULATION

Register's Fees 4 60

Sheriff's Fees 1 75

Commissioner's Fees

Solicitor's Fees

Witness Fees

Guardian Ad Litem

Printer's Fees

Trial Tax 3 00

Recording Decree in Probate Court

**The State of Alabama,** } No. \_\_\_\_\_  
**Baldwin County,** } Circuit Court, In Equity January 31 Term, 1940

To any Sheriff of the State of Alabama—GREETING:  
 You are hereby commanded, That of the goods and chattels, lands and tenements of Ralph G. Nelson Defendant  
 you cause to be made the sum of nine and 35/100 Dollars,  
 which was taxed as costs against complainant Plaintiff  
 recovered of complainant on the 31st day of January 1940  
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of in said cause by complt vs. Virginia Lowell Nelson Dollars,  
 costs o' suit, and have the same to render to the said R. B. Duck, Register  
 and make return of this Writ and the execution thereof, according to law.

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

Witness my hand, this 6th day of March 1940

R. B. Duck Register  
By E. E. Smith, Deputy

BILL OF COMPLAINT

Filed November 10, 1935  
R.S. Duch, Register  
By - *Handwritten signature*, Deputy

ANSWER TO COMPLAINT

Filed November 10, 1938  
R.S. Pugh, Register  
By - Wallace Thompson - Deputy



