

Mary Palmer, Complainant,
vs
Eugene W. Palmer, Respondent.)

In The Circuit Court of Baldwin
County, Alabama.
In Equity.

To the Honorable Francis W Hare, Judge of the Twenty First Judicial
Circuit of Alabama, which includes Baldwin County:

Humbly complaining, your Oratrix, Mary Palmer, respectfully represents
unto your Honor as follows:-

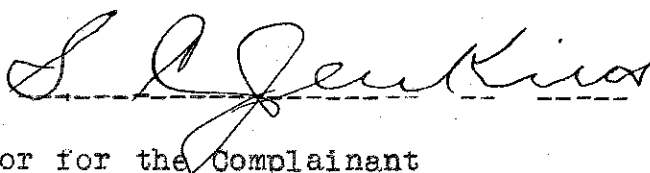
1. That your Oratrix, the said Mary Palmer, and the respondent, the
said Eugene W Palmer, were legally married, on towit, February 1st, 1919,
at Frisco City, in Monroe County, Alabama. That they lived together as
husband and wife until, towit, September 1st, 1937, when they separated
while they were living at Frisco City, Alabama and that they have not
since said time lived together as husband and wife. Both your oratrix and
the respondent are over the age of twenty one years and both have ^{been} resident
citizens of the state of Alabama, all their lives. Your Oratrix now is
residing at Frisco City in said Monroe County, Alabama and the respondent
resides at or near Bay Minette, Alabama, where he has been living and
residing for more that a year prior to the filing of the Bill of Complaint
in this cause.

2. That your Oratrix and the respondent lived to gether quite peacefully
up ^{to} about the years 1933 or 1934, when he begané to drink and become
quarrelsome and mean in his disposition towards your Oratrix; he at least
became addicted to whiskey and for a year before the separation took
place between your Oratrix and the respondent, he became a confirmed drunk-
ard, coming in home at all hours of the night and acting ugly, cruel and
indecent towards your Oratrix; a short time before they separated, on
towit, Sept. 1st, 1937, the respandent struck and beat your Oratrix with
his fists . In fact his conduct became such that your Oratrix had a
a reasonable apprehension of great bodily harm to herself from the saíd
Eugene W Palmer, the respondent, such as would endanger her health and her
life. Consequently she was compelled to cease to live with him as a
wife, ~~and~~ respondent left her and went down into Baldwin County to live.

Wherefore the premises considered, your Oratrix, the said Mary -
Palmer, prays that a subpoena be issued and directed to the said Eugene
W Palmer, the respondent in this cause, that he be brought into this
Honoreable Court; that he may be made a party defendant to the Bill of

Complaint filed in this cause and that upon a final hearing of the evidence in this cause and at a final hearing therein, your Honor will order, adjudge and decree that the bonds of matrimony heretofore existing between your Oratrix and the respondent, the said Eugene W Palmer, be forever dissolved and prays, also that your Oratrix be permitted to marry again and that she be granted such other and further relief as may in equity and good conscience seem meet and proper to your Honor .

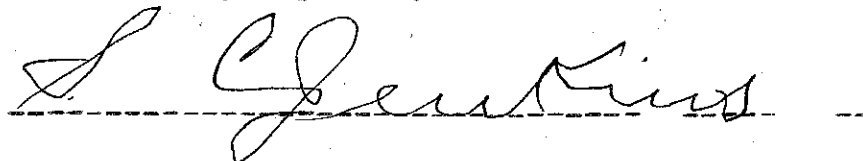
And your Oratrix will ever pray etc .



Solicitor for the Complainant

Foot note:-

The respondent is required to answer each and every paragraph of the foregoing Bill of Complaint from item 1 to item 3 inclusive, but his answer under oath is hereby expressly waived .



Solicitor for the Complainant.

CHANCERY EXECUTION

BILL OF COSTS

No. 503 Mary Palmer

Vs. Eugene Palmer

Plaintiff
Defendant

FEES OF REGISTER	Dollars	Cents	Brought Forward	Total
Filing each bill and other papers.....	\$	10	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%.	855
Issuing each subpoena.....		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Issuing each copy thereof.....		40	Each notice sent by mail to creditor...	
Entering each return thereof.....		15	Filing, receipting for and docketing each claim, etc.....	
For each order of publication.....	1	00	For all entries on subpoena docket, etc.	
Issuing writ of injunction.....	1	50	For all entries on commission docket, etc.	
For each copy thereof.....		50	Making final record, per 100 words	
Entering each return thereof.....		15	Certified copy of decree.....	450
Issuing Writ of Attachment.....	1	00	Report of divorce to State Health Office	
Entering each return thereof.....		15	(Acts 1915)	
Docketing each case.....	1	00	Total Fees of Register.....	809
Entering each appearance.....		25	FEES OF SHERIFF	
Issuing each decree pro confesso on per. ser.	1	00	Serving and returning subpoena on deft.	150
Issuing each decree pro confesso on publication	1	00	Serving and returning subpoena for witness	
Each order appointing guardian.....	1	00	Levying attachment.....	300
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.....	250
Entering order submitting cause.....		50	Collecting execution for costs.....	150
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	150
Entering each decree.....		75	Serving and returning writ of exeat.	150
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	250
Each report, 500 words or less.....	2	50	Serving and returning application, etc.	100
For every 100 words over 500.....		15	Serving attachment, contempt of court	150
Amount claimed less than \$500, etc.....	2	00	Total Fees of Sheriff.....	300
Issuing each subpoena.....		25	RECAPITULATION	
Witness certificate, each.....		25	Register's Fees	805
Issuing execution, each		75	Sheriff's Fees	305
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	300
Hearing and passing on application, etc.	3	00	Recording Decree in Probate Court....	
Each settlement with receiver, etc.....	3	00	Total.....	1405
Exam'ing each voucher of Receiver, etc.		10		
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, 1½ per ct.; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, ¼ of 1 per ct.				
Sub Total Carried Forward.....				

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

To Any Sheriff of the State of Alabama—GREETINGS:
 You are hereby commanded, That of the goods and chattels, lands and tenements of Mary Palmer Defendant.....
 you cause to be made the sum of _____ Dollars,
 which _____ Plaintiff.....
 recovered of Edward on the 30 day of Sept 1941
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of _____ Dollars,
 costs of suit, and have the same to render to the said Edward,
 and make return of this Writ and the execution thereof, according to law.
 Interest from Sept 1st 1941 to date of collection.
 Witness my hand, this 27th day of Sept 1941
Edward, Register.

503

No. 576

The State of Alabama,
Baldwin County.

Circuit Court, In Equity.

Mary Palmer

vs.

Eugene Palmer

CHANCERY EXECUTION
Fi. F. Co.

\$ 42.05

Total \$

Fee Book Page 1405

Execution Docket Page

Complainant's Solicitor:

J. J. Judd

The State of Alabama,
Baldwin County.

ha..... duly waived..... right
to the exemption of personal property as to
the collection of the debt for which this exe-
cution is issued.

Register.

Received in office this 27

day of December 1941

W. R. Stewart
Sheriff

Execution Docket..... Page

Returned February 27, 1942

No property of the plaintiff
found.

W. R. Stewart, Sheriff
By Mrs. Stewart, D.S.

Printed By Baldwin Times, Bay Minette, Ala.

The State of Alabama, }
Baldwin County.

By virtue of the within execution I have levied

Horizontal lines for recording details of the execution.

RECORDED

MARY PALMER,
Complainant,

vs.

HUGENNE PALMER,
Respondent.

BILL OF COMPLAINT.

Filed November 15, 1938.

R. S. Quirk, Register.
BY: *Walter Thompson*
Deputy-Register.