

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.

In Equity.

TO THE HONORABLE, JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA,--In Equity.

Your Orator Fred Stoll, respectfully represents and shows unto your Honor as follows:

1. That he is a bona fide resident of Baldwin County, Alabama, residing at Seminole in said County and have resided there for a period of more than the last three years just preceeding the filing of this bill, and that he is over the age of twenty-one years.

That Myrtle Stoll is a resident of Baldwin County, Alabama, residing at Lillian in said County and State, and that she is over the age of twenty-one years.

2. That your Orator and the said Myrtle Stoll were lawfully married about January 15th, 1916, and lived together as man and wife until May 29th, 1920, at which time the said Myrtle Stoll committed the act of adultery with one Fritz Kopy; your Orator did not connive nor has he condoned the said act of adultery.

PRAYER FOR PROCESS.

The premises considered your Orator prays that the said Myrtle Stoll be made party respondent to this bill of complaint by the usual process of this Honorable Court and that she be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause your Honor will grant unto your Orator an absolute divorce from the said Myrtle Stoll.

That if your Orator is mistaken in the relief prayed then your Honor will grant unto him such other, further,

different and general relief as he may in justice and equity be entitled, he will ever pray, etc.

P A G E & M O O R E R ,
Solicitors for Complainat.

FOOT NOTE:

The respondent, Myrtle ^{Stoll}, is required to answer each and every allegation of the foregoing bill of complaint from Paragraph 1 to 2, both inclusive, but not under oath, answer under oath being hereby expressly waived.

P A G E & M O O R E R ,
Solicitors for Complainant.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Myrtle Stoll,

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

Fred Stoll,

against said

Myrtle Stoll,

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, T. W. Richerson, Register of said Circuit Court, this 26th, day of June,

1920.



Register.

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

Original
Serve on _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Fred Stoll,

vs.

Myrtle Stoll.

*Rec'd Copy on
Myrtle Stoll
Lillian A. ...*

Page and Moorer.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this 26th
day of June, 1920. 192

Sheriff

Executed this _____ day of
_____ 192

by leaving a copy of the within summons with

Defendant

Sheriff

By _____
Deputy Sheriff

I hereby accept service
of the within subpoena, this
10th day of July, 1920.

Myrtle Stoll

Witnesses:

E. K. Fogg

RECORDED

Fred Stoll,	:	IN THE CIRCUIT COURT,
Complainant.	:	BALDWIN COUNTY, ALA.
	:	
vs	:	
	:	In Equity.
Myrtle Stoll,	:	
Defendant.	:	

Comes Myrtle Stoll, the Defendant, in the above style cause and for answer to the complaint denies each and every allegation of the said bill of complaint and demands strict proof of same. She waives service by the sheriff of subpoena on said bill, notice of the filing of interrogatories, or any proceeding to take the testimony on oral examination as well as the right to cross examine, and consents that this cause be submitted for decree on note of testimony made by the Register, either in term time or vacation.

Dated this 14th day of August, 1920.

Witnesses:

E. J. Fogg

X Myrtle Stoll

The State of Alabama, _____ County.

CIRCUIT COURT, IN EQUITY.

Fred Stell _____ Complainant

vs.

Myrtle Stell _____ Defendant

Deposition of Fred Stell and Jacob Frederick

By virtue of the appointment to take the Deposition, indorsed in writing, on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County, I,

_____, Register of said Court of said County, have called and caused to come before me

the witness _____ named in the Interrogatories, and having first sworn the said witness _____ to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

Testimony of Fred Stell:

My name is Fred Stell. I am a resident of Baldwin County, Alabama and reside at Seminole in said County of Baldwin. I have lived here for more than the last three preceding years next before the filing of this bill. I am over twenty-one years of age. Myrtle Stell is my wife. She resides at Lillian, Baldwin County, Alabama and she is over the age of twenty-one years.

Myrtle Stell and myself were married about January 15th, 1916, and lived together as man and wife until May 29th, 1920, at which time the said Myrtle Stell committed the act of adultery with one Fritz Keppy. They often slept in a room by themselves and I know of my own knowledge that Fritz Keppy committed the act of adultery with Myrtle Stell. I did not condone or connive the said act of adultery. Myrtle Stell is over twenty-one years of age.

Fred J. Stell

Sworn and subscribed to before me this 20th day of August, 1920.

Register.

Testimony of Jacob Frederick:

My name is Jacob Frederick, I live within a quarter of mile from Fred Stell. I know that Myrtle Stell and Fred Keppy often slept in the same room together with no other person in there. I have lived near Mt. Stell for about 18 months. In my best judgment Fritz Keppy and Myrtle Stell lived together in a state of adultery.

Jacob Frederick

Sworn and subscribed to before me this 20th day of August, 1920.

Register.

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....

I,....., the said Register, hereby certify that the foregoing testimony was taken down in writing by..... in the words of the witness, and were read over to....., that th..... assented, swore to and subscribed the same in my presence, the..... day of....., 191....., at....., Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and that I am not of counsel or of kin to any of the parties to said cause, or in any manner interested in the result thereof.

And I enclose the deposition, together with the Interrogatories, Direct and Cross, and the documents which were deposed to, in an envelope properly endorsed and sealed and placed the same on file in my office.

Given under my hand and seal this the..... day of....., 191....., Register.

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....

REGISTER'S FEES.

.....	days at \$1.50 per day	\$.....
.....	words at 20 cents per hundred	\$.....

4th

No. _____ Page _____

The State of Alabama,

Barlow COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Frank Stone

vs. Complainant,

Myrtle Stone

Defendant.

Deposition Taken Before Register on Interrogatories.

Deposition of *Complainant*

for _____

Filed *20* day of *July*, 19*20*

Published by order of the Court, _____ day

of _____, 191 _____

J. H. [Signature] Register.

MARSHALL & BRUCE CO., NASHVILLE

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 240 Vacation Term, 1920

Fred Stoll

Complainant

vs.

Myrtle Stoll

Defendant

To T.W. Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the

Complainant, by Page and Moorner,

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Page and Moorner

Solicitor for Complainant.

5-100

No. 220 Page

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

Fred Stoll

vs.

Myrtle Stoll

REQUEST FOR DECREE IN
VACATION.

Filed August 20th, 1941

J. W. Richardson

Register

Recorded in Record

Vol. Page

Register

CORDED

Fred Stoll

vs.

Myrtle Stoll

THE STATE OF ALABAMA,

BALDWIN COUNTY

IN EQUITY,

CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,

Answer of Defendant, and testimony of 2 witnesses for Complainant,

Jacob Frederick and Fred J Stoll,

and in behalf of Defendant upon

D. L. Rickey

Register

600

No. 240

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Fred Stoll

vs.

Myrtle Stoll

NOTE OF TESTIMONY.

Filed in Open Court this 20th

day of August 1920. 191

D. J. Williamson

Register

RECORDED

T. W. RICHESON
CLERK AND REGISTER CIRCUIT COURT
BALDWIN COUNTY, ALA.

BAY MINETTE, ALA., August 20th, 1920.

Hon. J. D. Leigh,
Brewton, Alabama.

Dear Judge:-

Enclosed find papers in cause of Stoll
vs Stoll for divorce.

Hoping you enjoying life I beg to remain yours truly.

T. W. Richeson

(C O P Y)

August 19th, 1920.

In consideration of the following named articles and stock, I agree not to contest the divorce proceedings in any way: 1 Black Horse (Dick); 1 black cow (Minnie); 1 black cow (Ruby); 1 dozen goats, 1 black sow and 2 meat Hogs., and chickens. Also 50 bushel of sweet potatoes, 1 ton of hay, 20 bushel of shelled corn. Also \$100 in cash- \$50 to be paid when I leave and \$50 on January 1, 1921.

(signed) Fred Stoll

(signed) Myrtle Stoll

Witness:

E. K. Fogg.

*over the
attest*
*W. B. Reese
att'y for Mrs
Myrtle Stoll*

TWENTY-FIRST JUDICIAL CIRCUIT

OF ALABAMA

JOHN D. LEIGH, JUDGE
BREWTON ALA.

February 28, 1921.

Hon. T. W. Richardson, Register,
Bay Minette, Ala.

Dear Mr. Richardson:-

I am returning herewith file in Fred Stoll vs. Myrtle Stoll.

Mr. Reece, an attorney of Pensacola, Florida, sent me copy of motion, the original of which has no doubt been filed with you. There should be a hearing on the matter set forth in Mr. Reeces' petition and motion before a final decree is entered. Will you please notify Mr. Reece and attorneys for complainant that no hearing will be had in this matter until Mr. Reece has had a reasonable opportunity to offer testimony touching the facts set out in his motion, or until the motion and petition has been eliminated?

Yours truly,

John D. Leigh

R. P. Reese

Attorney at Law

Pensacola, Florida

January 27th, 1921.

Judge of the Chancery Court,

Bay Minnette, Alabama.

Dear Sir:-

I am informed that you have before you a divorce proceeding brought by Fred Stoll against Mrs. Myrtle Stoll, his wife. This divorce proceeding, as I am informed and from the papers which I am handing you herewith, was brought about by collusion between the husband and wife. Mrs. Stoll does not know to this day what charges her husband made against her in his bill of complaint.

I am handing you a copy of this agreement which was executed by Mr. Stoll and his wife, that you may see for yourself the divorce should not be granted.

Mr. Stoll has been living in Escambia County, Florida, some time but has left without making any provision for his two little children.

In consequence of the collusion and the evident purpose of Fred Stoll to get rid of his family obligations, I am filing a motion to dismiss the bill of complaint or to annul the decree, if decree has been entered.

I am writing you direct because I do not know who the attorney is for Mr. Stoll. Please advise me what the

R. P. Reese

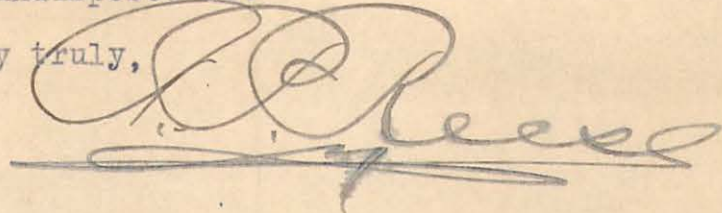
Attorney at Law

Pensacola, Florida

.....2.

status of the case is, as I am just in receipt of a letter from the Clerk of the Court advising me that this case was in your hands and undisposed of.

Yours very truly,

A handwritten signature in dark ink, appearing to read "R. P. Reese". The signature is written in a cursive style with large, looping letters. Below the signature is a horizontal line, possibly a strike-through or a decorative underline.

RPR/P.

Incl.

copy

IN THE CHANCERY COURT, BALDWIN COUNTY,
STATE OF ALABAMA.

FRED STOLL

-VS-

MYRTLE STOLL

Comes the defendant, Myrtle Stoll, by her attorney, R. P. Reese, and moves the Court to dismiss the bill of complaint herein filed, or if decree has been entered granting divorce to complainant, to set aside and annul the said decree, upon the following grounds, to-wit:

1. Because the said divorce proceeding was begun and procured through connivance, confederation and collusion of the parties to this suit, and based upon the following agreement, to-wit:

" Aug. 19th, 1920.

In consideration of the following named articles and stock, I agree not to contest the divorce proceedings in any way: 1 Black Horse (Dick); 1 black cow (Minnie); 1 black cow (Ruby); 1 dozen goats, 1 black cow and 2 meat Hogs., and chickens. Also 50 Bushel of sweet potatoes, 1 ton of hay, 20 Bushel of shelled corn. Also \$100 in cash- \$50 to be paid when I leave and \$50 on January 1, 1921.

Fred Stoll

Myrtle Stoll

Witness:
E. K. Fogg. "

2. That the defendant, Fred Stoll, is the father of two infant children, one child, Ethel Stoll now about three years old, and an infant child now about six months

old; that no provision whatever has been made by the father for the maintenance and support of the said infant children; that this petitioner has no knowledge of the facts as alleged in his bill of complaint, and petitioner further says that there were no grounds existing for a divorce between complainant and the defendant at the time the suit was entered or since; that this petitioner has, since her marriage to the said Fred Stoll, been a true, faithful and devoted wife; that he left her and desired a separation solely and on account of his evident desire to be rid of his family obligations; that said Fred Stoll is a German man about forty-five or fifty years of age whose home was originally in the State of Illinois, and to which point this petitioner is advised and believes and therefore avers he has fled and returned to, leaving petitioner and his two children unprovided for.

WHEREFORE petitioner prays that the said divorce proceeding shall be dismissed, or if the divorce decree has been entered in this case, that the same may be annulled and set aside upon the grounds as herein set forth.

Signed



Solicitor for Petitioner.

1/26/21.

STATE OF FLORIDA,
ESCAMBIA COUNTY.

Before the undersigned authority, this day,
personally came and appeared, Mrs. Myrtle Stoll, who
being by me first duly sworn, says that she has heard
read the foregoing petition, and knows the contents
thereof; that the same is true of her own knowledge
except as to those matters therein stated on information
and belief, and as to those matters she verily believes
them to be true.

S

Sworn to and subscribed before me
this _____ day of January A. D. 1921.

NOTARY PUBLIC.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 240

CIRCUIT COURT, IN EQUITY.

Fred Stoll

Complainant

vs.
Myrtle Stoll,

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, ~~decreed pro confesso~~

Answer of Defendant and testimony of Fred J Stoll and Jacob Fred-
-erick,
and testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the Complainant
is entitled to the relief prayed for in

his said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore
existing between the Complainant and Defendant be, and the same are hereby dissolved, and the said

Fred Stoll

is forever divorced from the said

Myrtle Stoll

for and on account of

Adultery,

as alleged in said Bill of Complaint;

It is further ordered, that the said Fred Stoll

be, and he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Fred Stoll

pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found,"
then execution for such costs may issue against the said Myrtle Stoll

It is further ordered, adjudged and decreed that said Fred Stoll

shall not again marry except to said Myrtle Stoll

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except
to said Myrtle Stoll during the pendency of said appeal.

This day of August, 1920, 191-

Judge of the Circuit Court of Baldwin County.

15K Copy

No. 240

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Fred Stoll

vs.

Myrtle Stoll,

DECREE OF DIVORCE.

Filed in office this

day of 191

Register.

E. O. M.