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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 Margana Beckom,

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

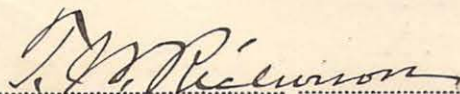
Gaston Beckom,

against said Margana Beckom,

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 July,

1920.



Register.

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

Original 2nd

Serve on

Circuit Court of Baldwin County
In Equity

No.

SUMMONS

Gaston Beckom,

vs.

Margana Beckom.

Serve copy on Margana
Beckom, Lives one mile above
Greer's side camp; 4 miles
above Tensaw, Baldwin Co, Ala.

Stone and Stone.

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this
day of 192.....

Sheriff

Executed this 5th day of
August 1920

by leaving a copy of the within summons with
Margana Beckom

Defendant

W.R. Stuart
Sheriff

By
Deputy Sheriff

RECORDED

GASTON BECKHAM

IN THE CIRCUIT COURT OF BALDWIN COUNTY.

VS

21st. Judicial Circuit. Alabama.

MARGANA BECKHAM.

EQUITY SIDE.

To The Hon John D Leigh, Judge of the 21st. Judicial Circuit sitting as Chancellor.

Your Orator Gaston Beckham, respectfully shows unto Your Honor that he is now and has been for more than three years next immediately preceding the filing of this, his bill of complaint for Divorce against Margana Beckham, a resident of Baldwin County, State of Alabama, and that he and the respondent Margana Beckham, are both over the ages of 21 years and that both are residents of Baldwin County Alabama.

Orator charges:-

1st.

That he and the said Margana Beckham were married in Baldwin County Alabama, about 25 years ago, and lived together as man and wife until the month of March 1918 when the said Margana Beckham voluntarily and without just cause abandoned and deserted your Orator and has ever since voluntarily abandoned him.

2nd.

That said Margana Beckham is now and has been for some time living in adultery with one Dave Bradley near Tensaw Baldwin County Alabama, and that Orator since he first heard of said offence has never condoned nor forgiven said offence of lived with her as a husband.

Prayer for Process.

The premises considered Your Orator prays that Your Honor will cause to issue such process as will be necessary to make the said Margana Beckham party defendant to this bill of complaint for divorce, and that you may enter such orders and decrees as may be proper in the premises.

Prayer for Relief.

Petitioner prays that upon a final hearing of this cause that it may please Your Honor to grant to him an absolute decree of divorce from the said Margana Beckham and such other or such further relief as to Your Honor may seem meet and proper, and as in duty bound he will ever pray. Etc.

Gaston Beckham

By *Stevens & Stunt*

(over for foot-note) Solicitors

FOOT NOTE.

Respondent is required to answer each paragraph of the above bill of complaint from 1 to 2 inclusive, but not under oath, as oath to said answer is hereby expressly waived.

Osston Beckom

By *Stearns Stear* Solicitors.

and that he and Beckom, a resident of Baldwin County, State of Alabama, and that he and the respondent herein, were both over the age of 21 years and that both are residents of Baldwin County, Alabama.

that he and the said respondent herein were married in Baldwin County, Alabama, about 26 years ago, and lived together as man and wife until the month of March 1918 when the said respondent herein voluntarily and without just cause abandoned and deserted your petitioner and has ever since

voluntarily abandoned him. and that said respondent herein is now and has been for some time living in adultery with one Mrs. [Name] near [Location] Baldwin County, Alabama, and that your petitioner since his first month of said offense has never condoned nor forgiven said offense of lived with her as a husband.

Prayer for divorce. The petitioner prays that your Honor will cause to issue such process as shall be necessary to make the said respondent herein conform to this bill of complaint for divorce, and that your Honor

prayer for relief. petitioner prays that upon a final hearing of this cause that it may please your Honor to grant to him an absolute decree of divorce from the said respondent herein and such other or each further relief as to your Honor may seem just and proper, and as in and to that end he will ever pray, etc.

prof.

Gaston Beckham,) In the CIRCUIT COURT OF BALDWIN COUNTY? ALABAMA.
 Complainant.)
 vs.) In Equity.
 Morgana Beckham,)
 Defendant.)

The Answer and Cross Bill, of Morgana Beckham to the Bill of Complaint filed against her in the above stated case.

1.

Respondent admits that she and the complainant were married in Baldwin County, Alabama, and lived together as man and wife for a good many years.

She most emphatically denies that some time in March 1918, or at any other time, that she abandoned the said Gaston Beckham, on the contrary she says that the said Gaston Beckham voluntarily abandoned her, more than two years ago, and has ever since lived separate and apart from her.

Further answering said first paragraph of the Bill, she says she continued to live in the same house after said Gaston Beckham left her that was occupied by the family when he left, and is still living in said house; that said Gaston Beckham took his clothing and other personal effects and left Respondent and their children still occupying said house, and declared that he would not live with her any longer.

She further says that since he voluntarily abandoned her more than two years ago, he has never contributed any thing towards the support of Respondent or their three children, all under ten years of age, but that Respondent has had to support herself and said three children by her own labor.

2.

Respondent denies the allegations of the Second paragraph of said Bill and says they are not true.

3.

Further answering said Bill Respondent says she has no property of her own and has had to earn her own living and that of the three children since said Gaston Beckham abandoned her. That said Gaston Beckham is an able bodied man and earns a good living, besides he is the owner of one hundred and sixty (160) acres of land in this County on ~~wh~~ a part of which she and the children are living. Respondent has been a bona fide resident of this state for more than three years next before the filing of this cross bill.

She therefore prays that this her Answer may be taken and held to be a Cross Bill and that the said Gaston Beckham may be required to answer the same, and that on the coming in of the testimony your Honor will order and decree that she is entitled to a divorce from the said Gaston Beckham, and that he be required to pay her permanent alimony; that your Honor will decree her an allowance out of the estate of said Gaston Beckham, taking into consideration the value thereof and the condition of his family.

She further prays that pending this suit your Honor will make her an allowance for her support and the support of said children out of the estate of said Gaston Beckham, her husband, suitable to his estate and the condition in life of the parties.

And further that your Honor will require the Complainant to pay into the hands of the Register of this Court, a reasonable sum of money to enable her to pay her solicitor's fees for services rendered and to be rendered in making her defense in this cause, and to that end that the Court will order and direct the Register to hold a reference and ascertain and report to this Court what would be such reasonable fee to her Solicitor.

M. S. Anderson

Solicitor for Respondent.

Note:

Complainant is required to answer this Cross Bill from Paragraph 1 to paragraph 3 both inclusive, but not under oath, his oath being expressly waived.

M. S. Anderson

Solicitor for Respondent.