

(516)

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

WILLIE LOU HARVILLE,

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

ARTHUR HARVILLE,

against said WILLIE LOU HARVILLE,

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, R. S. Duck, Register of said Circuit Court, this 5th day of

January, 1930.

R. S. DUCK  
clerk, - register

By *Louise Thompson* Register  
Deputy

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

The State Of Alabama, } Circuit Court of Baldwin County, In Equity.  
Baldwin County

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ARTHUR HARVILLE,

against said WILLIE LOU HARVILLE,

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, R. S. Duck, Register of said Circuit Court, this 5th day of January, 1939.

R. S. DUCK  
clerk, - register

*[Signature]*, Register  
Deputy

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

ARTHUR HARVILLE,  
Complainant,  
VS.  
WILLIE LOU HARVILLE,  
Respondent.

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

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

Comes your Complainant, ARTHUR HARVILLE, and humbly complaining against the Respondent, WILLIE LOU HARVILLE, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant and Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age.
2. That your Complainant and Respondent were married at Perdido, in Baldwin County, Alabama, on March 13th, 1931, and lived together as husband and wife, in Baldwin County, Alabama, until January 2nd, 1939.
3. That on to-wit, January 2nd, 1939, the Respondent committed ~~an~~ act of adultery with one Earle Dean; that said act on the part of the Respondent was without the consent or approval of the Complainant and that the Complainant has not condoned said act.
4. That there was born to said marriage between your Complainant and the Respondent two children: Arthur Harville, Jr., a boy six years old, and Louise Mildred Harville, a girl three years old; that the Respondent, on account of the facts above alleged, is not a fit or suitable person to have the care, custody and control of said minor children.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said WILLIE LOU HARVILLE 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 a final hearing of this cause, your Honor will enter an order and decree forever barring the bonds of matrimony existing between him and the Respondent; that a further decree be made and entered awarding to your Complainant the care, custody and control of said minor children: Arthur Harville, Jr. and Louise Mildred Harville; that your Honor will give and grant unto him such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

*Paula D. C. Duke*  
Solicitors for Complainant.

BILL OF COMPLAINT

FOOT NOTE:

VENUE HARVILLE

Complaint

AS

WILLIE LOU HARVILLE

Respondent

IN THE CIRCUIT COURT OF

DEKALB COUNTY, GEORGIA

IN EQUITY

The Respondent, WILLIE LOU HARVILLE, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in Paragraphs 1 to 4, inclusive, but not under oath, oath being hereby expressly waived.

Richard G. B. B.  
Solicitors for Complaints

ARTHUR HARVILLE,  
Complainant,  
VS.  
WILLIE LOU HARVILLE,  
Respondent.

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

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

Comes your Complainant, ARTHUR HARVILLE, and humbly complaining against the Respondent, WILLIE LOU HARVILLE, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant and Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age.
2. That your Complainant and Respondent were married at Perdido, in Baldwin County, Alabama, on March 13th, 1931, and lived together as husband and wife, in Baldwin County, Alabama, until January 2nd, 1939.
3. That on to-wit, January 2nd, 1939, the Respondent committed ~~an~~ act of adultery with one Earle Dean; that said act on the part of the Respondent was without the consent or approval of the Complainant and that the Complainant has not condoned said act.
4. That there was born to said marriage between your Complainant and the Respondent two children: Arthur Harville, Jr., a boy six years old, and Louise Mildred Harville, a girl three years old; that the Respondent, on account of the facts above alleged, is not a fit or suitable person to have the care, custody and control of said minor children.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said WILLIE LOU HARVILLE 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 a final hearing of this cause, your Honor will enter an order and decree forever barring the bonds of matrimony existing between him and the Respondent; that a further decree be made and entered awarding to your Complainant the care, custody and control of said minor children: Arthur Harville, Jr. and Louise Mildred Harville; that your Honor will give and grant unto him such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

*Richard H. Hare*  
Solicitors for Complainant.

FOOT NOTE:

The Respondent, WILLIE LOU HARVILLE, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in Paragraphs 1 to 4, inclusive, but not under oath, oath being hereby expressly waived.

Richard D. ...  
Solicitors for Complainant.

RECORDED

Serve On \_\_\_\_\_

**Circuit Court of Baldwin County  
IN EQUITY**

No. 516

**Summons**

ARTHUR HARVILLE,

Complainant

**VS.**

WILLIE LOU HARVILLE,

Respondent.

BEER, HALL & BEER,  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

*settled*

**THE STATE OF ALABAMA,  
Baldwin County**

Received in office this 5<sup>th</sup>

day of June, 1939

*M. W. Jenkins*

Sheriff.

Executed this \_\_\_\_\_ day of \_\_\_\_\_

by leaving a copy of the Summons with \_\_\_\_\_, 193

Defendant

Sheriff

By \_\_\_\_\_  
Deputy Sheriff

Serve On \_\_\_\_\_

Circuit Court of Baldwin County  
IN EQUITY

No. 516

Summons

ARTHUR HARVILLE,

Complainant.

VS.

WILLIE LOU HARVILLE,

Respondent.

BERNARD HALL & BERRER,  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA,  
Baldwin County

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 193\_\_\_\_\_

Sheriff.

Executed this \_\_\_\_\_ day of \_\_\_\_\_,

by leaving a copy of the Summons with \_\_\_\_\_, 193\_\_\_\_\_

Defendant

Sheriff

By \_\_\_\_\_  
Deputy Sheriff



RECORDED 5/6

BILL OF COMPLAINT

ARTHUR HARVILLE,  
Complainant,

VS.

WILLIE LOU HARVILLE,  
Respondent,

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

Filed January 5, 1938  
E. S. DUCK

CLERK, COURT

By *Arthur Harville*  
Deputy

RECORDED

BILL OF COMPLAINT

NOT FOR

ARTHUR HARVILLE,

Complainant,

VS.

WILLIE LOU HARVILLE,

Respondent.

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

The Respondent, WILLIE LOU HARVILLE, is a resident of Baldwin County, Alabama, and is the wife of the Complainant, ARTHUR HARVILLE, who is also a resident of Baldwin County, Alabama. The Complainant alleges that the Respondent has been guilty of adultery with one [Name] [Name] [Name], who is also a resident of Baldwin County, Alabama. The Complainant further alleges that the Respondent has been guilty of cohabitation with the said [Name] [Name] [Name] and that the Respondent has been guilty of maintaining a common law marriage with the said [Name] [Name] [Name]. The Complainant prays that the Respondent be held liable for the same and that the Respondent be ordered to pay to the Complainant the sum of [Amount] as damages for the same. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as costs of this bill of complaint. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as attorney's fees. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as interest on the sum of [Amount] from the date of the filing of this bill of complaint to the date of payment. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as costs of this bill of complaint. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as attorney's fees. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as interest on the sum of [Amount] from the date of the filing of this bill of complaint to the date of payment. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as costs of this bill of complaint. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as attorney's fees. The Complainant further prays that the Respondent be ordered to pay to the Complainant the sum of [Amount] as interest on the sum of [Amount] from the date of the filing of this bill of complaint to the date of payment.

*Filed January 5, 1938*  
**R. D. DICK**  
Clerk of the Court  
By *Willie Lou Harville*  
[Signature]

*Arthur Harville*  
Attorney for Complainant