

517

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

Comes VALENA KIRKMAN REED and humbly complaining
against CHESTER A. REED, respectfully shows unto your Honor:

FIRST:

That your complainant is a resident of Baldwin County, Alabama, where she has resided continuously all of her life; that the residence and post office address of Chester A. Reed is unknown to your complainant; that she has made diligent search and inquiry to ascertain his present residence and post office address and has been unable to do so; that the last known address of the said Chester A. Reed was in the City of Mobile, Alabama, his particular street address or business residence was not known to this complainant; that your complainant and the said Chester A. Reed are both over the age of twenty-one years.

SECOND:

That your complainant and the said Chester A. Reed were married in the City of Mobile in January, 1928, and that they lived together as husband and wife at Fairhope, in Baldwin County, Alabama, until September, 1933, when the said Chester A. Reed abandoned your complainant without just cause or excuse, and your complainant and said Chester A. Reed have not lived together as husband and wife since said time and the said Chester A. Reed has made no contribution toward complainant's support during the said period.

WHEREFORE, your complainant prays this Honorable Court will take jurisdiction of the cause made by this bill of complaint and will by appropriate process cause the said Chester A. Reed to be made party respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Your complainant further prays that upon hearing of the

cause made by this bill of complaint this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this complainant and the said Chester A. Reed; and the complainant prays for such other, further and different relief as in equity and good conscience she may be entitled to receive.

Valera Kirkman Reed
Complainant.

FOOT NOTE:

The respondent is required to answer every allegation in the foregoing bill of complaint, Paragraphs FIRST to SECOND inclusive, but not under oath; oath is hereby expressly waived.

Valera Kirkman Reed
Complainant.

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned, a Notary Public in and for said County, in said State, this day personally appeared VALENA KIRKMAN REED, who being by me duly sworn, deposes and says that she is the complainant in the foregoing bill of complaint for divorce against Chester A. Reed; that the present place of residence and post office address of the said Chester A. Reed is unknown to your affiant; that she has made diligent search and inquiry to ascertain the same, but has been unable to do so; that his last place of residence and post office address was in Mobile, Alabama.

Valena Kirkman Reed

Sworn to and subscribed before
me on this the 9th day of January,
1939.

Ada M. Turnbull
Notary Public, Baldwin County,
Alabama.

cause made by this bill of complaint this Honorable Court will
make and ~~on~~ TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA: ~~against~~ and the said Chester A. Reed;
and the ~~com~~ Comes VALENA KIRKMAN REED and humbly complaining
against CHESTER A. REED, respectfully shows unto your Honor:

FIRST:

That your complainant is a resident of Baldwin County, Alabama, where she has resided continuously all of her life; that the residence and post office address of Chester A. Reed is unknown to your complainant; that she has made diligent search and inquiry to ascertain his present residence and post office address and has been unable to do so; that the last known address of the said Chester A. Reed was in the City of Mobile, Alabama, his particular street address or business residence was not known to this complainant; that your complainant and the said Chester A. Reed are both over the age of twenty-one years.

SECOND:

That your complainant and the said Chester A. Reed were married in the City of Mobile in January, 1928, and that they lived together as husband and wife at Fairhope, in Baldwin County, Alabama, until September, 1933, when the said Chester A. Reed abandoned your complainant without just cause or excuse, and your complainant and said Chester A. Reed have not lived together as husband and wife since said time and the said Chester A. Reed has made no contribution toward complainant's support during the said period.

WHEREFORE, your complainant prays this Honorable Court will take jurisdiction of the cause made by this bill of complaint and will by appropriate process cause the said Chester A. Reed to be made party respondent to this bill of complaint and be required to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Your complainant further prays that upon hearing of the

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned, a Notary Public in and for said County, in said State, this day personally appeared VALENA KIRKMAN REED, who being by me duly sworn, deposes and says that she is the complainant in the foregoing bill of complaint for divorce against Chester A. Reed; that the present place of residence and post office address of the said Chester A. Reed is unknown to your affiant; that she has made diligent search and inquiry to ascertain the same, but has been unable to do so; that his last place of residence and post office address was in Mobile, Alabama.

Valena Kirkman Reed

Sworn to and subscribed before
me on this the 9th day of January,
1939.

Ida M. Turnbull

Notary Public, Baldwin County,
Alabama.

[Handwritten signature]

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

NOTICE TO NON-RESIDENT

The State of Alabama, Baldwin County, Circuit Court, in Equity. This the 9th day of January, 1939.

VALENA KIRKMAN REED, Complainant, No. 517, Vs. CHESTER A. REED, Respondent.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Valena Kirkman Reed that the Defendant, Chester A. Reed, is a non-resident of the State of Alabama; that the present place of residence and postoffice address of the said Chester A. Reed is unknown; and further, that, in the belief of said Affiant, the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Chester A. Reed, to answer or demur to the Bill of Complaint in this cause by the 2nd day of February, 1939, or after thirty days therefrom a decree Pro Confesso may be taken against him.

R. S. DUCK, Register.

By Nan Alice Thompson, Deputy Register. 50-4t.

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

J. H. Faulkner, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Valena Kirkman Reed
vs. Chester A. Reed

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<i>January 12, 1939</i>	Vol. <i>49</i> No. <i>50</i>
Date of second publication	<i>" 19, 1939</i>	Vol. <i>49</i> No. <i>51</i>
Date of third publication	<i>" 26, 1939</i>	Vol. <i>49</i> No. <i>52</i>
Date of fourth publication	<i>Feb. 2, 1939</i>	Vol. <i>50</i> No. <i>1</i>

Subscribed and sworn before the undersigned this day of

FEB 17 1939 193.....

Herbert R. Weston
HERBERT R. WESTON NOTARY PUBLIC
BALDWIN CO. ALA.

J. H. Faulkner
Publisher

CHANCERY EXECUTION

BILL OF COST

No. 517

Valena Kirkman Reed,
Complainant

Vs.

Chester A. Reed,
Respondent

~~Plaintiff~~
~~Defendant~~

	Dollars	Cents		Dollars	Cents
FEES OF REGISTER					
Filing each bill and other papers.....	2	20	Brought Forward.....	3	85
Issuing each subpoena.....			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%.		
Issuing each copy thereof.....			Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.		
Entering each return thereof.....			Each notice sent by mail to creditor	15	
For each order of publication.....	1	00	Filing, receipting for and docketing each claim, etc.	25	
Issuing writ of injunction.....	1	50	For all entries on subpoena docket, etc.	50	
For each copy thereof.....			For all entries on commission docket, etc.	50	
Entering each return thereof.....			Making final record, per 100 words	15	
Issuing writ of attachment.....	1	00	Certified copy of decree	1	00
Entering each return thereof.....			Report of divorce to State Health Office	50	
Docketing each case.....	1	00	(Acts 1915)		
Entering each appearance.....			Total Fees of Register		5 35
Issuing each decree pro confesso on per. ser.....	1	00	FEES OF SHERIFF		
Issuing each decree pro confesso on publication.....	1	00	Serving and returning subpoena on deft	\$1	50
Each order appointing guardian.....	1	00	Serving and returning subpoena for witness	65	
Any other order by Register.....	50		Levying attachment.....	3	00
Issuing commission to take testimony.....	50		Entering and returning same	25	
Receiving and filing.....	10		Selling property attached		
Endorsing each package.....	10		Impaneling Jury	75	
Entering order submitting cause.....	50		Executing writ of possession	2	50
Entering any other order of court.....	25		Collecting execution for costs	1	50
Noting all testimony.....	50		Serving and returning sci. fa., each	65	
Abstract of cause, etc.....	1	00	Serving and returning notice	65	
Entering each decree.....	75		Serving and returning writ of injunction	1	50
For every 100 words over 500.....	15		Serving and returning writ of exeat	1	50
Taking account, etc.....	3	00	Taking and approving bonds, each	75	
Taking testimony, etc.....	15		Collecting money on execution		
Each report, 500 words or less.....	2	50	Making deed	2	50
For every 100 words over 500.....	15		Serving and returning application, etc.	1	00
Amount claimed less than \$500, etc.....	2	00	Serving attachment, contempt of court	1	50
Issuing each subpoena.....	25		Total Fees of Sheriff		1 50
Witness certificate, each.....	25		RECAPITULATION		
Issuing execution, each.....	75		Register's Fees		
Entering each return.....	15		Sheriff's Fees		
Taking and approving bond, each.....	1	00	Commissioner's Fees		
Making copy of bill, etc.....	15		Solicitor's Fees		
Each notice not otherwise provided for.....	50		Witness Fees		
Each certificate or affidavit, with seal.....	50		Guardian Ad Litem		
Each certificate or affidavit, no seal.....	25		Printer's Fees		
Hearing and passing on application, etc.....	3	00	Trial Tax	3	00
Each settlement with receiver, etc.....	3	00	Recording Decree in Probate Court		
Examining each voucher of receiver, etc.....	10		Total		6 35
Examining each answer, etc.....	3	00			1 50
Recording resignation, etc.....	75				8 10
Entering each certificate to Supreme Court.....	50				6 14 95
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 fees as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 per ct.; all over \$100 and not exceeding \$1,000, 1 1-2 per ct.; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all all over \$20,000, 1-4 of 1 per ct..					
Sub Total Carried Forward.....	3	85			

THE STATE OF ALABAMA,
Baldwin County.

No. 517

CIRCUIT COURT, IN EQUITY

May

TERM, 1941

To any Sheriff of the State of Alabama—GREETINGS:

You are hereby commanded, That of the goods and chattels, lands and tenements of

Valena Kirkman Reed

Defendant

you cause to be made the sum of

\$14 95

Dollars,

which

Dismissed Without Prejudice

Plaintiff.....

recovered of

on the

4

day of

February

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 _____ and make return of this Writ and the execution thereof, according to law.

Interest from _____ 194 _____ to date of collection.

Witness my hand, this

2nd

day of

May

1941

R.S. Duak

Register.

Statement

THE BALDWIN TIMES

BAY MINETTE, ALABAMA

2/17

1938

Hon. R. S. Duck

City

Advertising:

Valena Kirkman Reed vs.
Chester A. Reed -

180 W. @ 4 1/2¢

\$8.10

Job Printing:

THE BALDWIN TRUST

RECEIVED FROM THE BALDWIN TRUST

STATE OF NEW YORK

Filed February 17, 1939

R. S. DYCK

clerk, - registrar

By *Franklin S. ...*

Deputy

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, the undersigned, a Notary Public in and for said County, in said State, this day personally appeared VALERIE KIRKMAN REED, who being by me duly sworn, deposes and says that she is the complainant in the foregoing bill of complaint for divorce against Chester A. Reed; that the present place of residence and post office address of the said Chester A. Reed is unknown to your affiant; that she has made diligent search and inquiry to ascertain the same, but has been unable to do so; that his last place of residence and post office address was in Mobile, Alabama.

Valerie Kirkman Reed

Sworn to and subscribed before me on this the 9th day of January, 1939.

Ibs M. Turnbull

Notary Public, Baldwin County, Alabama

*Filed January 9, 1939
R. S. Beach, Register
By: Andrew Thompson
Agent*