

260

HERMINA HEGEDUS,
Complainant,
VS.
PAUL HEGEDUS, SR.,
Respondent,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
In Equity.

This cause is submitted for decree on the Register's report of reference to ascertain and fix a reasonable Solicitor's fee for Complainant's Solicitors, Messrs. Inge & Bates, for representing her in these proceedings, and also to determine a suitable sum to be paid Complainant as alimony pendente lite, said report having been filed herein on March 20th., 1929, and no objections or exceptions filed thereto.

X

It is therefore ordered, adjudged and decreed by the Court that said Register's report be, and the same hereby is, in all things approved. It is further ordered adjudged and decreed that the said Respondent, Paul Hegedus, Sr., pay over to the Register of this Court for the use of the complainant, Hermina Hegedus, the sum of Twelve and NO/100 (\$12.00) per month as alimony pendente lite, said payments to commence as of the 13th., day of April, 1928, and continue during the pendency of this suit.

It is further ordered, adjudged and decreed by the Court that the Complainant, Hermina Hegedus, have and recover of the Respondent, Paul Hegedus, Sr., the sum of Seventy-five and NO/100 (\$75.00) Dollars, as a reasonable solicitor's fee for Complainant's solicitors of record, Messrs. Inge & Bates, for conducting these proceedings. The said respondent is ordered and directed to pay said sums of money over to the Register of this Court for the purposes indicated, and within thirty days from the filing of this decree.

The Register will issue a certified copy hereof and the Sheriff of Baldwin County, Alabama, is ordered and directed

to serve such copy upon the respondent promptly upon receipt thereof.

Done at Chambers at Monroeville, Alabama,
this 3rd., day of April, 1929.

J. W. Hare

Judge.

HERMINA HEGEDUS, :
Complainant.

VS :

PAUL HEGEDUS, SR. :
Defendant.

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

No. 260.

Comes the complainant in the above entitled cause and moves the Court to render an order granting her the right to amend her bill of complaint as per amendment on file.

Ruge & Bates
ATTORNEYS FOR COMPLAINANT.

HERMINA HEGEDUS,
Complainant.

VS

PAUL HEGEDUS, SR.
Defendant.

:

:

:

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

NO.260.

TO THE HONORABLE T. W. RICHEYSON, REGISTER IN CHANCERY.

Comes the complainant in the above entitled cause, and shows unto Your Honor that more than thirty days have expired since she filed her amended bill of complaint in this cause, and since notice thereof was given to the respondent, and that the matter contained in the said amendment has not been denied in any previous answer of the respondent, *and that no answer has been filed.*

Wherefore, the complainant moves Your Honor to render a decree pro confesso against the respondent in this cause, as provided for by rule 48 of the rules of practice of Chancery courts, Vol. 4, page 921, Code 1923.

Judge & Bates
Attorneys for Complainant.

HERMINA HEGEDUS,
Complainant.

VS

PAUL HEGEDUS, SR.
Defendant.

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

: No. 260.

Comes the complainant in the above styled cause and amends her complaint so that it reads as follows, additional grounds arising subsequent to the filing of the original bill of complaint being alleged in this amendment under and by virtue of the provisions of Chancery Court Rule Number Forty-five, Vol. 4, page 920, Alabama Code 1923:

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING.

Comes Hermina Hegedus, complainant, and respectfully presents this amended bill of complaint against Paul Hegedus, Sr., and shows as follows:

ONE.

That the complainant is over the age of twenty-one years and is a bona fide resident of Mobile County, Alabama; that she has been a bona fide resident of the State of Alabama, for more than three years next preceding the filing of this amended bill of complaint; that the defendant, Paul Hegedus, Sr., is over the age of twenty-one years and is a bona fide resident of Baldwin County, State of Alabama.

TWO.

That the complainant and the defendant are husband and wife who were lawfully married in the City of St. Louis, Missouri, on the 27th day of January, 1912, that from the date of their marriage until the month of September, 1920, they lived together as man and wife.

THREE.

That on or about the 2nd day of September 1920, the defendant voluntarily abandoned your complainant, from bed and board, and that said abandonment has been continuous for a period of more than two years next preceding the filing of this amended bill of complaint;

that said abandonment was without cause, fault or consent of your complainant.

FOUR.

Complainant further shows that on, to-wit, the 2nd day of September, 1920, and many times prior thereto, the defendant cursed and abused the complainant; that he frequently beat her with his hands, choked her and threatened to kill her; that on the date last specifically set forth, he struck her severe blows on the head and body with an iron rod, desisting only upon noticing the approach of a neighbor; that such violence was attended with danger to the complainant's life or health of which she had reasonable apprehensions if she continued to live with him; that as a result of such cruel and inhuman treatment, she was forced to live separate and apart from the defendant from the date last specifically set forth, and she has in no way since condoned his said treatment of her.

FIVE.

Complainant further alleges that she has lived separate and apart from the bed and board of the defendant for more than five years next preceding the filing of this amended bill of complaint; that during this time and for more than two years next preceding the filing of this amended bill of complaint, she has been absolutely without support from the defendant and that during said period she has bona fide resided in the State of Alabama.

SIX.

That the said defendant has ample means wherewith to support, maintain and provide a home for complainant; that he has failed and refused to do so; that she has not the means of support and maintenance.

Wherefore, your complainant prays that this Honorable Court will take jurisdiction of this cause and issue appropriate process against the defendant, Paul Hegedus, Sr., requiring him to plead, answer or demur to this amended bill of complaint within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that your Honor will order and direct the Register of this Court to hold a reference to determine a suitable sum to be paid by the said defendant to your complainant for her maintenance and support during the pendency of this cause and that said defendant be ordered to pay to complainant such sum as the Register shall find; that upon the final hearing of this cause your Honor will grant to the complainant an absolute divorce from the bonds of matrimony from the said defendant, Paul Hegedus, Sr.; that your Honor will further decree that she may remarry after the expiration of such time as is provided by law, and that, upon the granting of a final decree, your Honor will order that the defendant pay to the complainant reasonable permanent alimony. Complainant prays for such other, further and additional relief as in equity and good conscience she may merit.

Judge & Bates
Solicitors for Complainant.

Foot Note:

Respondent is required to answer each allegation of the foregoing amended bill of complaint and each paragraph thereof from one to six, both inclusive, but not under oath, oath thereto being hereby expressly waived.

Judge & Bates
Solicitors for Complainant.

I hereby accept service of a copy of the foregoing amended complaint and waive all other and further notice of any kind whatsoever. *April 12, 1928.*

Norman Stone
Attorney for Defendant.

HERMINA HEGEDUS, Complainant,)
) Circuit Court of Baldwin
) County, Alabama.
) In Equity Sitting.
)
-Vs-)
PAUL HEGEDUS, Sr., Defendant.)

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF CIR-
CUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY SITTING:

Comes HERMINA HEGEDUS, Complainant, and re-
spectfully presents this Bill of Complaint against PAUL
HEGEDUS, Sr., and shows as follows:

FIRST: That Complainant and the said Defendant
Paul Hegedus, Sr., are both over the age of twenty-one
years and reside in Baldwin County, Alabama; that Complain-
ant and the said Defendant are husband and wife and have
been for more than ten years.

SECOND: That about seven months ago at the sug-
gestion of her husband, the said Defendant, Complainant
went to Cleveland, Ohio, procured work and from time to
time sent money to him to be saved for their mutual ben-
efit; that on to-wit, the 2nd day of September, 1920,
Complainant, on returning home, learned that during her
absence, Defendant has attempted to sell or give their
homestead and all the personal property used in connec-
tion therewith to his three sons by a former marriage,
namely; PAUL HEGEDUS, Jr., JOHN HEGEDUS and JOSEPH HEGE-
DUS, who, upon her arriving at her home, forbid her en-
tering on the premises, abused her, ^{threatened to strike her} drove her away and
ordered her not to return; that her said husband, the
said Paul Hegedus, Sr., was at home when this occurred,
and knew what was transpiring; that so far as Complain-
ant knows, he made no effort to receive her and made no
objections to this treatment to her by his said sons;
*that permitted this to be done by his said sons in
in their house and under his authority*

that she is now thrown upon the world without a home and without means of support; that she fears bodily harm will result should she attempt to again enter her home.

THIRD: That the said Defendant has ample means wherewith to support, maintain, and provide a home for her; that he has failed and refused to do so; that she has not the means of support and maintainance.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of this cause and by appropriate process make Paul Hegedus, Sr., a party defendant, requiring him to plead, answer, or demur to this Bill of Complaint within the time and under the penalties prescribed by law and the practice of this Honorable Court.

COMPLAINANT further prays that your Honor will order and direct the Register of this Court to hold a reference to determine a suitable sum to be paid by the said Defendant to your Complainant for her maintainance and support during the pendency of this cause, and that said Defendant be ordered to pay to Complainant such sum as the Register shall find, and that upon the final hearing of this cause your Honor will make, and enter an order permitting Complainant to reside separate and apart from her husband, and that a suitable sum be awarded your Complainant by said Defendant for her support and maintainance; and your Complainant prays for such other, further or different relief as in Equity she may be entitled to.

Richard Beebe
SOLICITORS FOR COMPLAINANT.

Defendant is required to answer every allegation of this Bill, paragraphs one to three inclusive, but not under oath. Oath is hereby waived.

Richard Beebe
Solicitors for Complainant.

Hermina Hedgudus,

vs.

Paul Hedgudus,

THE STATE OF ALABAMA,
Baldwin COUNTY.

CIRCUIT COURT OF
Baldwin COUNTY,

IN EQUITY.

Notice

In this cause it being made to appear to the Court that a ~~Summons~~ ^{Summons} was served upon the Defendant.....

Accepted by Atty N.C. Stone, for Complainant

by the Sheriff of Baldwin County, on the April 12th day of

1928, requiring *her* to appear and plead, answer or demur to the Bill of Complaint in his cause within thirty days from the service of said Summons, and the said Defendant....

having failed to plead, answer or demur to the said Bill to the date hereof. It is now, therefore, on motion of Complainant, ordered and decreed that the said Bill of Complaint in this cause be, and it hereby is, in all things, taken as confessed against the said Paul Hedgudus,

Defendant...aforesaid.

This 14th day of Jan 1929.

T. W. ...
Judge of the Circuit Court of
Baldwin County.

RECORDED

No.

IN EQUITY.

CIRCUIT COURT OF

Baldwin COUNTY,

H. Bauer Helgeson

vs.

Paul Helgeson

DECREE OF PRO CONFESSO.

Filed in office this *14* day of

June 19 *29*

T. M. Brown
Register.

E. O. M.

INGE, STALLWORTH & INGE

ATTORNEYS AT LAW
309-13 VAN ANTWERP BUILDING
MOBILE, ALABAMA

Oct. 22, 1929.

FRANCIS J. INGE
NICHOLAS E. STALLWORTH
FRANCIS H. INGE
HARRY SEALE

Hon. T. W. Richerson,
Register in Chancery,
Bay Minette, Alabama.

Dear Sir:

We inclose herewith an agreement to submit in the Hegedus case. Mr. Stone told us to mail it to you and that he would sign it some day while in your office. Both of us are very eager to have this matter finally disposed of, and we are sure Mr. Stone will be eager to sign the agreement at an early date, so that the file may be sent to Judge Hare for a decree.

You might tell Mr. Stone when he is in your office that I have read the testimony given by Mrs. Hegedus and believe that it is sufficient to get at least two divorces on.

Yours very truly,

HS-1


INGE STALLWORTH & INGE

PS - Mr. Richerson, will you please make a note of testimony for us, showing the amended bill, decree pro confesso and testimony of Mrs. Hermina Hegedus? Thank you.

Hermina Hegedus,
vs Complainant.
Paul Hegedus, Respondent.

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

This cause is submitted for decree on the Register's report of reference to ascertain and fix a reasonable Solicitor's fee for ~~Complainant~~ Inge & Bates, for representing her in these proceedings, and also to determine a suitable sum to be paid Complainant as alimony pendente lite,, said report having been filed herein on March 20th., 1929, and no objections or exceptions filed thereto,

It therefore ordered, adjudged and decreed by the Court that said Register's report be, and the same hereby is, in all things approved. It is further ordered adjudged and decreed that the said Respondent, Paul Hegedus, Sr., pay over to the Register of this Court for the use of the complainant, Hermina Hegedus, the sum of Twelve and No/100 per month as alimony pendente lite, said payments to commence as of the 13th. day of April, 1928, and continue during the pendency of this suit.

It is further ordered, adjudged and decreed by the Court that the Complainant, Hermina Hegeus, have and recover of the Respondent, Paul Hagedus, Sr., the sum of Seventy-five and No/100 Dollars, as a reasonable solicitors fee for Complainant's solicitors of record, Messers Inge & Bates, for conducting these proceedings. The said Respondent is ordered and directed to pay said sums of money over to the Register of this Court for the purposes indicated, and within thirty days from the filing of this decree.

The Register will issue a certified copy hereof, and the Sheriff of Baldwin County, Alabama, is ordered and directed to serve such copy upon the respondent promptly upon receipt thereof.

Done at Chambers at Monroeville, Alabama, this 3rd day of April. 1929.

F.W.Hare
Judge.

State of Alabama,
Baldwin County.

Circuit Court In Equity.

I, T.W. Richerson, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court of the 3rd day of April 1929, in the cause of Hermina Hegedus, Complainant vs. Paul Hegedus, Respondent, as appears of record in said Court.

Witness my hand and the seal of said Court, this the 5th day of April 1929.

T.W. Richerson

Register.

Executed by
sending a copy on
today for Comptroller
N. C. Stone, this
5th day of April
1929

C. Davis
Sheriff

Original

Hermina Hegedus,
Complainant.

vs.

Paul Hegedus, Respondent.

Filed April 5th, 1929.

~~J. W. Mac~~ Register.

Send Copy on
N. C. Stone
Attorney for Complainant
Today if possible

-----X
HERMINA HEGEDUS,
Complainant.)
-vs-)
PAUL HEGEDUS, Sr.,
Defendant.)
-----X

IN THE CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA.
BALDWIN COUNTY.

No. 260.

And now comes the defendant, Paul Hegedus, Sr., by his Solicitors,
Stone & Stone, and demurs to the bill of complaint in this cause filed
and for grounds thereof shows that:-

F I R S T .

There is no equity in said bill.

Stone & Stone
Solicitors for complainant.

*It is agreed that cause be submitted
on the demurrer Dec 17, 1970*

No. 260.

DEMURRER TO COMPLAINT.

HERMINA HEGEDUS,
Complainant.

-vs-

PAUL HEGEDUS, Sr.,
Defendant.

CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA.
BALDWIN COUNTY.

DIVORCE "MENSA ET THORA."

Filed in this court this the
12th day of October, A. D., 1920

D. W. Rice
Register.

8581 NOTE OF TESTIMONY

Hermina Hedgudus

vs.

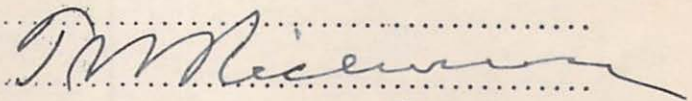
Paul Hedgudus, Sr.,

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,
~~decree~~ decree pro confesso decree pro confesson

and in behalf of Defendant upon



Register.

No. 260

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

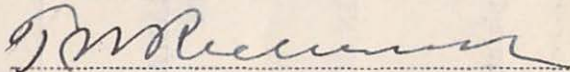
Hermina Hedgudus

VS

Paul Hedgudus, Sr.,

NOTE OF TESTIMONY

Filed in Open Court this 8th
Nov 9
day of 192



Register

INGE & BATES
ATTORNEYS AT LAW
310-11-12-13 VAN ANTWERP BUILDING
MOBILE, ALA.

FRANCIS J. INGE
FRANCIS H. INGE
HARRY SEALE

April 11th, 1928.

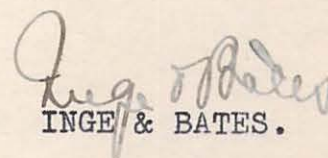
Hon. T. W. Richerson,
Register in Chancery,
Bay Minette, Ala.

Dear Mr. Richerson:

Enclosed herewith is file No. 260, Hegedus
versus Hegedus. We thank you for permitting us to
use this file.

Within the next few days we will forward an
amendment to the bill to Hon. Norborne Stone in order
that he may accept service and retain a copy. We will
also mail him a motion to allow the amendment which he
will be asked to call to the attention of the Court
and file.

Yours very truly,


INGE & BATES.

HS:wp

HERMINA HEDEGUS,
Complainant,

-vs-

PAUL HEDEGUS, Sr.
Defendant,

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

Comes Rickarby & Beebe, solicitors for complainant,
in the above styled cause, and withdraw their appearance for
said complainant.

This the 22nd day of April, 1921.

Rickarby & Beebe
Solicitors for Complainant.

HAMMERMILL
BOND

HERMINA HEGEDUS,
Complainant.

VS

PAUL HEGEDUS, SR.
Defendant.

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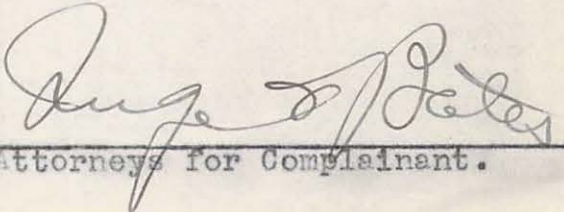
IN THE CIRCUIT COURT, EQUITY SIDE
IN THE STATE OF ALABAMA
BALDWIN COUNTY

NO.260.

TO THE HONORABLE T. W. RICHESON, REGISTER IN CHANCERY.

Comes the complainant in the above entitled cause, and shows unto Your Honor that more than thirty days have expired since she filed her amended bill of complaint in this cause, and since notice thereof was given to the respondent, and that the matter contained in the said amendment has not been denied in any previous answer of the respondent, *and that no answer has been filed*

Wherefore, the complainant moves Your Honor to render a decree pro confesso against the respondent in this cause, as provided for by rule 48 of the rules of practice of Chancery courts, Vol. 4, page 921, Code 1923.


Attorneys for Complainant.

Hermina Hedgudus
Complainant.
vs.

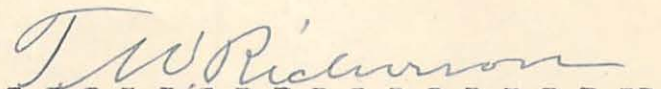
IN THE CIRCUIT COURT
EQUITY- SIDE.

Paul Hegudus, Sr.,

In this cause the Register reports to the Court that pursuant to a decree entered on the 4th day February 1929, by your Honor, to ascertain the proper amount for attorneys fees and alimony pendente said reference was held in the office of the Register February 4th, 1929 Both Solicitors for Complainant and Respondent being present, the testimony of the witness for Complainant was duly examined and said testimony reduced to writing it being agreed by the parties that the signature of the witness be waived, which testimony is hereto attached, Said reference was attended by the Solicitors for both Complainant and Respondent and the Complainant in person.

Upon careful consideration of the testimony before him, the Register finds and reports as follows:-

That the Solicitor for Complainant is entitled to a fee of \$75.00 for his services rendered in this cause as agreed upon by said Solicitors, said agreement being hereto attached and the amount of alimony pendente shall be the sum of \$12.00 per month, dating from the last amended complaint filed.



Register Circuit Court-in
In Equity.

HERMINA HEGEDUS,
Complainant.

VS.

PAUL HEGEDUS, SR.,
Defendant.

:

: IN THE CIRCUIT COURT * EQUITY SIDE
STATE OF ALABAMA.

:

BALDWIN COUNTY.

:

No. 260.

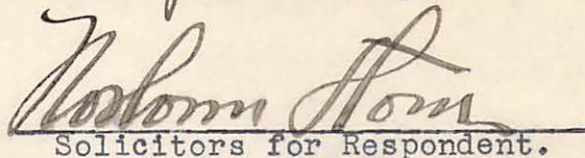
It is hereby agreed between the solicitors of record in the above cause that the attached copy of testimony given by the complainant in the office of Hon. T. W. Richerson, Register in Chancery, at Bay Minette, Alabama, on February 4th, 1929, is a correct statement of what she said on that date.

It is further agreed by the said solicitors that such testimony shall be used by the said Register in Chancery to base his findings of the amount the complainant should be paid by the respondent as alimony pendent~~a~~ lite in this cause; and the said solicitors hereby waive all notice of signatures and other formalities necessary to a reference legally held.

It is further agreed by and between said solicitors that \$75.00 is a reasonable attorney's fee for the complainant in prosecuting the above cause and it is agreed that the Register shall so report to the Court.

Witness our hands this 5th day of February, 1929.


Solicitors for Complainant.


Solicitors for Respondent.

TESTIMONY GIVEN BY HERMINA HEGEDUS BEFORE
HON. T. W. RICHERSON, IN HIS OFFICE AT
BAY MINETTE, ALABAMA, ON FEBRUARY 4th, 1929.

On direct examination by Attorney Harry Seale
of the firm of Inge & Bates, the witness
testified as follows:

My name is Hermina Hegedus and I am the complainant in a divorce suit against my husband, now pending in the Circuit Court of Baldwin County, Alabama. I have no separate estate of my own and have to depend upon my own labor for my living. At the time my husband and I separated, we were living on a farm in this County at Elberta and our annual income from what we produced on this farm was approximately One Thousand Dollars (\$1000.00). This farm contains twenty acres, of fine land. I have not seen my husband since 1925 and at that time he was strong and healthy. I do not know whether he is healthy now or not. My husband is still in possession of this farm and the legal title is in his name although there is a suit now pending in the equity court of this County to determine in whom the legal title exists.

On cross-examination by Mr. Norborne Stone,
the witness testified as follows:

I do not know that my husband is an invalid and that his sons have to keep him up. I have not seen him since 1925 and I do not know whether they have been making brick on the farm since that date. Part of the income from the farm came from the brick made. I make Twenty Dollars (\$20.00) a week cooking. I make more money than my husband does.

On re-direct examination, the witness
testified as follows:

I do not make Twenty Dollars every week. I had to leave Mobile County a few weeks ago and go to Cleveland, Ohio, because I could not

get a job. My employment has not been regular at all. I have been sick too. My husband has not given me any support whatever since our separation in 1920.

HERMINA HEGEDUS
Complainant,
-vs-
PAUL HEGEDUS SR.
Defendant .

IN THE CIRCUIT COURT-EQUIRY SIDE
STATE OF ALABAMA.
BALDWIN COUNTY.

No. 260.

By virtue of an agreement between the parties or counsel in the case of Hermina Hegedus vs Paul Hegedus, pending in the Circuit Court-Equity Side, the undersigned, acting as commissioner, has caused Hermina Hegedus, a witness in said case, to come before me, who, being duly sworn true answer to make to the annexed interrogatories, deposes and answers as follows:-

My name is Hermina Hegedus and I am the Complainant in the divorce suit pending in the Circuit Court of Baldwin County, Alabama in equity, styled Hermina Hegedus vs Paul Hegedus Sr., No. 260; I am over the age of 21 years and a bona fide resident of Mobile County, Alabama, and was such resident on August 13th., 1928, and I have been a bona fide resident of the State of Alabama, since 1915 and continued such residence until August 13th., 1928, the date of the filing of my Amended Bill of Complaint. Paul Hegedus Sr. is my husband, who having married in St. Louis, Missouri, on January 27, 1912. He is over the age of 21 years and is a bona fide resident of Baldwin County, Alabama. He and I lived together as man and wife from January 27, 1912 until the month of September, 1920, at which time we were living together on our farm in Baldwin County, Alabama, in the village of Elberta.

Very soon after our marriage my husband, Paul Hegedus Sr. became abusive toward me and frequently cursed me and abused me. In 1914 he struck me with his fist in my side and broke two of my ribs as a result of this blow I was forced to secure medical attention and was unable to work for sometime. Later during that same year my husband became angry with me because I had purchased a pair of shoes for \$2.00 and struck me with a lighted kerosene lamp. My clothing caught fire and I was prevented from being severely burned only by quickly wrapping my apron over my burning clothing. Subsequent to these attacks by my husband on many dates he permitted his sons who were living with us and who were under his management and control

to threaten and abuse me. At one time after we moved to Elberta, Alabama, Paul Hegedus Jr. drew a gun on me and John Hegedus drew an ax on me and Joe Hegedus drew a chair on me and all of them threatened to strike me if I did not cook more pan-cakes for Paul. At that time my husband was present and permitted his three sons to treat me in the foregoing manner without any remonstrance on his part. In the fall of 1917 Joe Hegedus, then about 17 years of age, requested me to have sexual intercourse with him. I immediately went to my husband and demanded that he discipline his son for this indecent approach but my husband took his part and stated to me that I should go ahead and have intercourse with the boy, that it would save his paying out money to other women.

In the Spring of 1918 the three boys named above and who were my step-sons left our home at Elberta and did not return until the Fall of 1920. While the boys were away my husband and I lived together in peace and in spite of all the cruelties and indignities that had been heaped upon me before, I continued to live with him and to try to make him a good wife. In February, 1920, my husband and I decided to sell out our farm and he requested me to go up North and see if I could not find a purchaser. He suggested that while I was on this mission I should get a job cooking and stay until I could find a purchaser for the farm. I did this and stayed up North until August, 1920, but was unable to find a purchaser.

In June, 1920, my husband wrote and requested my permission for the boys to return home. I wrote him back that since they had been so mean to me I would not consent to it. My husband never answered that letter. The latter part of August, 1920, I returned to Elberta to find out what was wrong and my husband and Joe and John had me locked out and would not let me enter our home. When I reached the front gate I saw my husband coming out from the stable with the boys and Joe and John pushed him in the house and would not let me see him, they hollered at me and told me to go to Bay Minette and see their lawyer. My husband was then a very powerful man and could have pushed the two boys to one side but he made no effort to resist them and apparently went into the house willingly. Since that time I have made a number of efforts to return and live with him but he has refused to permit me and has had warrants issued against me

to prevent me from walking on the premises. Since September, 1920, we have not lived together as man and wife.

During the period from September, 1920, when my husband drove me away from my home, until the present time I have lived absolutely without support from my husband and during all of said period I have been a bona fide resident of the State of Alabama. In fact during all the time that I lived with my husband he never even bought me one dress. Especially do I state that during the two years next immediately preceding the 13th. day of August, 1928, my husband has failed to give me any means of support whatever and for more than five years next preceding the said 13th. day of August, 1928, have I lived separate and apart from the bed and board of my husband.

My husband is now living on our farm at Elberta. During the time I lived with my husband on the farm we cleared approximately \$1,000.00 a year on the products we raised and sold from the farm. I have no personal estate of my own and have to depend upon my labor for a living. My husband absolutely refuses to give me any support.

Mr. Hermin Hegedus

Answered, subscribed and sworn to before me this 5th. day of February, 1929.

W. B. Heard
Witness.

Herbert Crandall
As Commissioner.

STATE OF ALABAMA :

COUNTY OF BALDWIN :

It is hereby agreed by and between the undersigned, who constitute all of the solicitors of record for the complainant and respondent in the cause of Hermina Hegedus vs. Paul H. Hegedus, in the Circuit Court of Baldwin County, Alabama, in equity, that the testimony of Hermina Hegedus upon oral interrogatories propounded to her may be taken before and reduced to writing by Herbert Crandall as commissioner without the issuance to the said Herbert Crandall of any commission, the issuance of which is hereby expressly waived, and that said commissioner may call said witness to come before him at the hour of 3 on February 5th, 1929, at the offices of Norman Stone in the City of Bay Minette, Alabama, and that the testimony of said witness may be taken without further or other notice to the undersigned of any kind or description, all notice of the examining of said witness upon oral interrogatories at said time and place being hereby expressly waived.

Given under our hands and seals this day of February,
1929.

Judge & Bates (SEAL)
Solicitors for Hermina Hegedus.

Norman Stone (SEAL)
Solicitors for Paul H. Hegedus.

The State of Alabama, }
Baldwin County

No. 260

CIRCUIT COURT IN EQUITY

Hermina Hedgudus

Complainant

vs.

Paul Hedgudus, Sr.,

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the 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 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 complainant is forever divorced from the Defendant, on account of Voluntary abandonment,

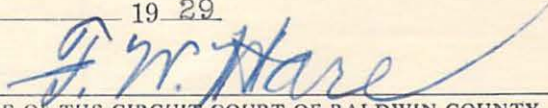
It is further ordered, that the said Hermina Hedgudus be, and s he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Hermina Hedgudus 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 Paul Hedgudus, Sr.,

It is further ordered, adjudged and decreed that the said Hermina Hedgudus, shall not again marry except to said Paul Hedgudus, Sr., until sixty days after this date, and that if an appeal is taken within sixty days s he shall not marry again except to said Paul Hedgudus, Sr., during the said pendency of appeal

This 8th day of Nov

19 29



JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA }
BALDWIN COUNTY }

CIRCUIT COURT, IN EQUITY

I, _____, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the _____ day of _____ 9____, in the cause of _____

Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the _____ day of _____, 19____

Register

vn
No. 260

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

Hermina Hedgudus,

vs

Paul Hedgudus, Sr,

DECREE OF DIVORCE

Filed in office this 8th

day of Nov, 1929

T M Gessner
Register.

E. O. M. _____

RECORDED

decree.

DECREE.

This cause coming on to be heard is submitted for final decree upon the pleadings and proof as noted by the Register, from a consideration of which the Court is of the opinion that the Complainant is entitled to have the conveyance of said homestead by Paul Hegedus, Sr., to Paul Hegedus, Jr., John Hegedus and Joseph Hegedus, executed on, to-wit: the 26th., day of July, 1920, declared null and void.

It is therefore ordered, adjudged and decreed by the Court that said conveyance is void and of no effect.

It is further ordered by the Court that the Register of this Court be, and he hereby is, directed to ascertain if said deed has been recorded in the Probate Office of Baldwin County, Alabama, and if so, to endorse on the record thereof that the same is null and void, referring thereon to this decree as his authority therefor.

The cross-complainant's cross-bill is dismissed out of this court, and respondents taxed with the costs of this proceeding, for which let execution issue.

Done at Monroeville, Alabama, this the 12th., day of February, 1929.

J. W. Hare

Judge of the Twenty-first Judicial
Circuit of Alabama.

Subject:

FINANCE DIVISION

United States Post Office
Saint Louis, Missouri

FIRST CLASS

October 14, 1926.

This is to certify that in accordance with the records of this office money orders numbered 29180, 29181 and 29182 issued at Soulard Station, St. Louis, Mo. on March 12, 1912, were drawn for \$100, \$100 and \$5.00 respectively, and the remitter of these money orders was Paul Hegedus.

Louis A. A. A.
Postmaster.

\$100.00; 29182, \$5.00. The name of the remitter is the same on all three, Paul Hegedus.

5. They are. Copy is hereto attached.

CROSS INTERROGATORIES.

1. I have no personal knowledge of the money orders and no personal knowledge as to the purchaser.
2. No, I have not.

Louis Act.

Subscribed and sworn to before me this

26th day of October, A. D. 1926.

Stephen F. Pinter
Commissioner.

The said JOSEPH HANNA, having been first sworn to speak the truth, the whole truth and nothing but the truth, deposes and says as follows:

DIRECT INTERROGATORIES

1. Joseph Hanna; fifty; 1537 South Broadway, St. Louis, Missouri; lawyer by profession; twenty two years.
2. Yes, I know all of these parties. About fifteen years.

3. Only as a Notary, during 1911, 1912, 1913 and 1914.
I have, the years being 1911, 1912, 1913 and 1914.
4. I did. Executing papers and acting as their attorney and notary and forwarding papers to the Baldwin Colony Company at Chicago, Illinois, to complete the contract of same, and also inspecting necessary papers and title and deed to the property in question.
5. He did. I did. I can't remember the exact amounts and the exact time the payments were made but there were some amounts in the years 1911 and 1912 which I forwarded as payment upon said property for Paul Hegedus, Sr. through money orders, payment being made by money orders.
6. She did not. None was delivered by her to me.
7. She did not at no time.
- 8.p It was part of the estate inherited by the children through a former marriage of his, the same to be applied in payment of said property.
- 9.; Never at no time did she pay me money or instruct me to apply money received for her account on a deed to be transmitted in her name.
10. They did. The money was inherited through their mother from her estate. The source of my knowledge is from statements made by Paul Hegedus, Sr, the children, and also by Hermina Hegedus, wife of Paul Hegedus, Sr., that the children had inherited the money from the mother.

All money that I have handled in payment for the property in question was to my knowledge the money of the children, the money of the three parties, belonged to them and was inherited from their mother. The amount paid on the purchase price of the property was derived from that source from the minors' inheritance.

11. According to my information she did; she often spoke to me at the time, that the children had an inheritance, that they had inherited also some money from their deceased mother.
12. At no time.
13. She did not.
14. Yes. It was remitted through money orders in the name of Paul Hegedus, Sr.
15. He had. Consultations I had with him and legal advice I gave him was that as far as the children were minors they could not take property in their names unless a guardian was appointed, therefore I advised him the property should be in his name until the minors became of age, and after they reached their majority the property should be deeded to the minors. The reason was because the money was an inheritance belonging to the children from the mother and provision was made by the mother that the children should inherit the money, the same to be evenly divided and to be invested for them until they became of age, and for that reason the father decided

to purchase property so that they would have a permanent investment.

16. I do not.

17. About one half.

CROSS INTERROGATORIES.

1. I do not know the exact amount. The dates were in the years 1911 and 1912. One particular amount was \$205.00, I think, and that was the payment that was in March 1912, and it was through postal money orders. There were three postal money orders. The money was turned over to me in cash.
2. The money was remitted by postoffice money orders. The receipt for the money orders is not in my possession.
3. I obtained it from Paul Hegedus, Sr. and Hermina Hegedus.
4. It was obtained from Paul Hegedus, Sr., Hermina Hegedus and the children. Obtained the knowledge from Paul Hegedus, Sr. and Hermina Hegedus and the three minor children that it belonged to John Hegedus, Joseph Hegedus and Paul Hegedus, Jr.
5. Not to my knowledge.

Joseph Hanna

Subscribed and sworn to before me this

26th day of October, A. D. 1926.

Stephen F. Pinter
Commissioner.

I, Stephen F. Pinter, the said Commissioner, hereby certify that the foregoing testimony was taken down in shorthand by L. W. Weir in the words of the witness,^o and were read over ^{by} them that they assented, swore to and subscribed the same in my presence, the 26th day of October, 1926, at St. Louis, Missouri, that I have personal knowledge of the identity of the witnesses, 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 said Depositions, together with the Commission and interrogatories, Direct and Cross, and documents which were deposed to, in an envelope properly indorsed and sealed and returned to the Register for said Court of said County.

Given under my hand and seal, this 26th day of October, 1926.

Stephen F. Pinter
Commissioner.

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

<i>Louis Cett</i>	<i>2 days</i>	<i>150 per day</i>	<i>\$ 3 00</i>
<i>Joseph Hanna</i>	<i>2 "</i>	<i>150 " "</i>	<i>\$ 3 00</i>
<i>Process served</i>	<i>2 witnesses</i>	<i>1 00 per</i>	<i>\$ 2 00</i>
<i>Reporter</i>			<i>\$ 15 00</i>
<i>Commissioners fee</i>			<i>\$ 25 00</i>
			<i>48 00</i>

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 Paul Hegedus, Jr., John Hegedus,
Joseph Heggedus, and Paul Hegedus, Sr.,

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 ^{Cross, /} Bill of Complaint lately exhibited by

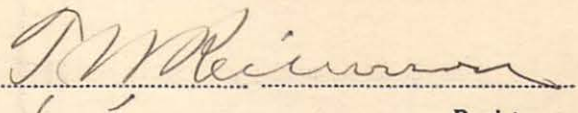
Hermina Hegedus,

against said Paul Hegedus, Jr, ~~Joseph Heggedus~~, John Gegedus, Joseph Hegedus,
and Paul Hegedus, Sr,

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 10th, day of June,

3.
192


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

~~Hermine Hegodus,~~

vs.

~~Paul Hegodus, Jr., et al.~~

*Serve Copies on
Stone & Stone
Attys for Def's*

Jesse F. Hogan,
Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this
day of 192

Sheriff

Executed this *13th* day of
June 192 *3*

by leaving a copy of the within summons with
NC Stone Atty

Defendant

MR Stewart

Sheriff

By
Deputy Sheriff

----- X
 HERMINA HEGEDUS,)
 Complainant.)
) IN THE CIRCUIT COURT-EQUITY SIDE
 -vs-) STATE OF ALABAMA
) BALDWIN COUNTY.
 PAUL HEGEDUS, Jr., JOHN)
 HEGEDUS, JOSEPH HEGEDUS)
 and PAUL HEGEDUS, SR.,)
 ----- X

Comes the defendants, Paul Hegedus, Jr., John Hegedus, and Joseph Hegedus and demur to the Bill of Complaint as amended and filed in this cause on June 8th., 1923 and for grounds of demurrer show:-

FIRST.

That said bill, of complaint as amended is without equity.

SECOND.

That said bill of complaint as amended is a departure from original bill in this cause filed.

THIRD.

That said bill of complaint as amended is a departure from the facts and matters alleged and relief sought in original bill in this cause filed.

FOURTH.

That said bill of complaint as amended is a departure from the original bill in this cause filed by complainant in that, complainant by original bill sought the establishment of the title to the lands in question in ~~the~~ Paul Hegedus, Sr., but now by the amended bill seeks establishment of title to same lands in complainant.

FIFTH.

That said bill of complaint as amended is a departure from the original bill in this cause filed in that a new and distinct and different cause of action is alleged and different relief sought in this:- That by original bill complaint sought establishment of title to real property in Paul Hegedus, Sr., but by this amended bill seeks establishment of title to said real property and in addition thereto to certain personal property in complainant and against the said Paul Hegedus, Sr.,

Wherefore these defendants, Paul Hegedus, Jr., John Hegedus and Joseph Hegedus demur to said bill as amended and to all matters and things therein contained and pray judgment of this honorable court whether they shall be compelled to answer further and pray to be dismissed with their reasonable costs sustained.

*None of them
Solicitors for above defendant*

