

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.

  
~~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.

Myrtle Stoll

Sworn to and subscribed before me  
this 28th day of January A. D. 1921.

Georgia Padgett  
NOTARY PUBLIC.



R. P. Reese

Attorney at Law

Pensacola, Florida

January 28th, 1921.

Clerk of the Circuit Court,  
Bay Minnette, Alabama.

Dear Sir:-

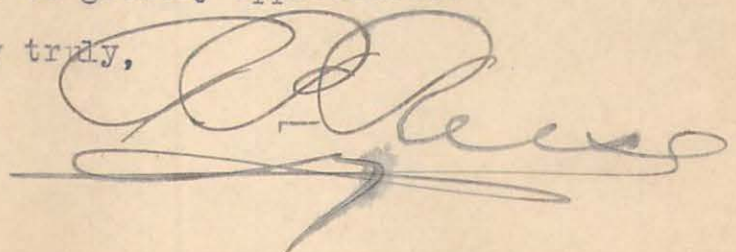
Several days ago I wrote you with reference to the divorce proceeding now pending in the Chancery Court of your county, between Fred Stoll and Myrtle Stoll. In your letter you advised me that the case was in the hands of the Chancellor and undisposed of.

I am sending you a petition to be filed in your Court, asking for the Court to deny the divorce or if the divorce has been granted to set the same aside on the grounds set forth in the petition. I have written to the Judge advising him of the facts and also inclosing him a copy of the petition.

Will you kindly advise me at once if the divorce has been granted. Please also advise me what costs will be required to be deposited. Will you kindly advise me the name of the attorney for Fred Stoll?

An early reply will be greatly appreciated.

Yours very truly,



RPR/P.  
Incls.