

548

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 ERICE KNOWLES,

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

TENIE KNOWLES,

against said ERICE KNOWLES,

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 9th day of June, 193 9.

R. S. DUCK
clerk. - register

By *[Signature]* Deputy Register

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

CHANCERY EXECUTION

BILL OF COSTS

No. 548

Teenie Knowles
VS.

Eric Knowles

PLAINTIFF

DEFENDANT

FEES OF REGISTER		Dollars	Cents	Brought Forward	\$
Filing each bill and other papers	\$ 10		60		6 00
Issuing each subpoena	50		50	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	40		40	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Entering each return thereof	15		15	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	50			For all entries on commission docket, etc.	50
Entering each return thereof	15			Making final record, per 100 words	15
Issuing Writ of Attachment	1 00			Certified copy of decree	1 00
Entering each return thereof	15			Report of divorce to State Health Office (Acts 1915)	50
Docketing each case	1 00	1 00			2 00
Entering each appearance	25		25	TOTAL FEES OF REGISTER	\$ 9 50
Issuing each decree pro confesso on per ser.	1 00		1 00	FEES OF SHERIFF	
Issuing each decree pro confesso on publica	1 00		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			Levyng attachment	3 00
Issuing Commission to take testimony	50		50	Entering and returning same	25
Receiving and filing	10		10	Selling property attached	
Endorsing each package	10		10	Impaneling Jury	75
Entering order submitting cause	50		50	Executing Writ of possession	2 50
Entering any other order of court	25		25	Collecting execution for costs	1 50
Noting all testimony	50		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				
Witness certificate, each	25			TOTAL FEES OF SHERIFF	\$ 3 00
Issuing execution, each	75		75	RECAPITULATION	
Entering each return	15		15	Register's Fees	9 50
Taking and approving bond, each	1 00			Sheriff's Fees	3 00
Making copy of bill, etc.	15			Commissioner's Fees	
Each notice not otherwise provided for	50			Solicitor's Fees	
Each certificate or affidavit, with seal	50			Witness Fees	
Each certificate or affidavit, no seal	25			Guardian Ad Litem	
Hearing and passing on application, etc.	3 00			Printer's Fees	
Each settlement with Receiver, etc.	3 00			Trial Tax	3 00
Examining each voucher of Receiver, etc.	10			Recording Decree in Probate Court	3 00
Examining each answer, etc.	3 00				
Recording resignation, etc.	75			TOTAL	\$ 15 50
Entering each certificate to Supreme Court	50				
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 fee as in similar cases.					
Commission on sales, etc: 1st \$100, 2 per cent; all over \$100 and not exceeding \$1,000, 1 1-2 per cent; all over \$1,000, and not exceeding \$20,000, 1 per ct; all over 20,000, 1-4 of 1 per cent					
Sub Total Carried Forward		6 00			

The State of Alabama, { No. 548
Baldwin County } Circuit Court, In Equity Term, 1939

To any Sheriff of the State of Alabama—GREETING:
 You are hereby commanded, That of the goods and chattels, lands and tenements of Teenie Knowles Defendant
 you cause to be made the sum of Fifteen & 50/100 Dollars,
 which costs of suit in above entitled cause Plaintiff
 recovered of complainant on the 15th day of July 1939
 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 R. B. Duval, Register
 and make return of this Writ and the execution thereof, according to law.

Interest from _____ 1939 to date of collection.
 Witness my hand, this 10 day of Feb 1940
R. B. Duval Register
B. J. Smith Depute

TENNIE KNOWLES,
Complainant,
VS.
ERICE KNOWLES,
Respondent.

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

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

And now comes your Complainant, TENNIE KNOWLES, and humbly complain-
ing against the Respondent, ERICE KNOWLES, respectfully represents and shows
unto your Honor and this Honorable Court as follows:

1. That your Complainant and Respondent are bona fide residents
of Baldwin County, Alabama, and over twenty-one years of age.
2. That your Complainant and the Respondent were married at Seminole,
in Baldwin County, Alabama, on June 20th, 1932, and lived together as husband
and wife, in Baldwin County, Alabama, until on to-wit, June 1st, 1938.
3. That on to-wit, June 1st, 1938, and various times prior thereto,
the Respondent cursed, abused and threatened the Complainant, and on various
occasions did actual violence to her person by striking her; that the conduct
of the Respondent was such as to give your Complainant reasonable apprehension
to believe and she does actually believe that if she had continued to live with
him, he would have carried out his threats and done further violence to her per-
son, which would have necessarily endangered her life and health.

WHEREFORE, the premises considered, Complainant prays that your Honor
will, by proper process, make the said ERICE KNOWLES party respondent to this
Bill of Complaint, requiring him 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 give and grant unto her a decree of absolute divorce, forever
barring the bonds of matrimony existing between her and the Respondent, ERICE
KNOWLES; that your Honor will give and grant unto her such other, further, dif-
ferent or general relief as she may be in equity and good conscience entitled
to receive, and as in duty bound she will ever pray.


Solicitors for Complainant.

FOOT NOTE:

The Respondent, ERICH KNOWLES, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 3, inclusive, but not under oath, oath being hereby expressly waived.

Beale, Scott & Beale
Attorneys for Complainant.

BILL OF COMPLAINT

ERICH KNOWLES,

Complainant,

vs.

ERICH KNOWLES,

Respondent.

IN THE CIRCUIT COURT OF

BRITAIN COUNTY, VIRGINIA.

FILED

RECORDED
INDEXED
10/15/00
CLERK OF COURT
BRITAIN COUNTY, VIRGINIA

TENIE KNOWLES,
Complainant,
VS.
ERICE KNOWLES,
Respondent.

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

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

And now comes your Complainant, TENIE KNOWLES, and humbly complaining against the Respondent, ERICE KNOWLES, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant and Respondent are bona fide residents of Baldwin County, Alabama, and over twenty-one years of age.
2. That your Complainant and the Respondent were married at Seminole, in Baldwin County, Alabama, on June 20th, 1932, and lived together as husband and wife, in Baldwin County, Alabama, until on to-wit, June 1st, 1938.
3. That on to-wit, June 1st, 1938, and various times prior thereto, the Respondent cursed, abused and threatened the Complainant, and on various occasions did actual violence to her person by striking her; that the conduct of the Respondent was such as to give your Complainant reasonable apprehension to believe and she does actually believe that if she had continued to live with him, he would have carried out his threats and done further violence to her person, which would have necessarily endangered her life and health.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said ERICE KNOWLES party respondent to this Bill of Complaint, requiring him 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 give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent, ERICE KNOWLES; that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Bullock & Baker
Solicitors for Complainant.

FOOT NOTE:

The Respondent, ERICE KNOWLES, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 3, inclusive, but not under oath, oath being hereby expressly waived.

Debra J. Rader
Solicitors for Complainant.

The State of Alabama,
Baldwin County.

No. _____ CIRCUIT COURT IN EQUITY.

TENIE KNOWLES _____ Complainant
vs.

ERICA KNOWLES _____ Defendant

In this cause it appears to the Register
that a summons requiring the Defendant, ERICA KNOWLES
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to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days
after the service of said Summons upon the Defendant
was served upon him _____ by the Sheriff of Escambia _____ County, Alabama, on the
13th day of June _____ 1939.

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint
to this date, 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 Defendant

Defendant aforesaid.

This 13th day of July 1939.

R. S. Dush Register.
By: *Wendell Thompson*, Deputy

The State of Alabama, {
Baldwin County

CIRCUIT COURT

To O'BYRNE JONES

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Tenie Knowles and O. Givens

as witnesses in behalf of Tenie Knowles in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Tenie Knowles is

Complainant

and Erice Knowles is

Defendant,

on oath to be by you administered, upon _____ to take and certify the deposition s. of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness 13th day of July 1939

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

R. S. Duch
By Handliss Thompson,
Deputy
REGISTER

TENIE KNOWLES,
Complainant,
VS.
ERICE KNOWLES,
Respondent.

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

This cause coming on to be heard is submitted upon the original Bill of Complaint and Pleadings and Proof as noted by the Register, and the Court, after due consideration thereof, is of the opinion that the Complainant is entitled to the relief prayed for:


IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant be and she is hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED that the Complainant pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said TENIE KNOWLES shall not again marry, except to the said ERICE KNOWLES, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said ERICE KNOWLES, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, this 15th day of July, 1959.


Judge of the Circuit Court of Baldwin
County, Alabama.

FILED 10 1940
No. 5748
KMN

THE STATE OF ALABAMA
Baldwin County.

Circuit Court, In Equity

Terrie Turner

vs.

Bess Turner

CHANCERY EXECUTION
Fi. Fa.

\$1550

Total \$1550

Fee Book _____ Page _____

Execution Docket _____ Page _____

Reube Hall & Beale
Complainant's Solicitor

THE STATE OF ALABAMA
Baldwin County.

he _____ duly waived _____ right
to the exemption of personal property as to
the collection of the debt for which this execu-
tion is issued.

Register.

Received in office this 10

day of February 1940

M. H. Stewart
Sheriff

Execution Docket _____ Page _____

*Returns & No property
of Terrie Turner
found in Baldwin
County 5/10 1940*

MOORE PRINTING CO., BAY MINISTERS, ALA.

The State of Alabama, }
Baldwin County

By virtue of the within execution I have levied _____

(021)

Serve On Erice Knowles, Flomaton, Ala.

**Circuit Court of Baldwin County
IN EQUITY**

No. 548

Summons

ERICE KNOWLES,
Complainant,

VS.

ERICE KNOWLES,
Respondent.

THE STATE OF ALABAMA,

Baldwin County

Received in office this 6-10-39

day of _____, 1939

W.P. Stewart,

Sheriff.

Executed this 13 day of

June, 1939

by leaving a copy of the Summons with

Erice Knowles

Defendant

Erice Knowles
Sheriff

By Erice Knowles
Deputy Sheriff

Beebe, Hall & Beebe,
Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED

BILL OF COMPLAINT

TENIE KNOWLES,

Complainant,

VS.

ERICE KNOWLES,

Respondent.

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

Filed June 9, 1939
R. S. DICK

clerk - registrar

By *Charles W. ...*
Deputy.

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

TENNIE KNOWLES

Complainant

vs.

ETIOP KNOWLES

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

O'Byrne Jones

WITNESSES:

Tennie Knowles and O. C. Givens

RECORDED

No.

Page

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

LENIE KNOWLES,

VS.

ERICE KNOWLES

**DECREE PRO CONFESSO ON
PERSONAL SERVICE**

Issued July 13, 1929

R. S. Dault

Register.

W. Miller Thompson
Meoy's Printing Company, Bay Mettelle, Ala.

RECORDED

FINAL DECREE OF DIVORCE

JENNIE KNOWLES,

Complainant,

VS.

ERICE KNOWLES,

Respondent.

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

Filed July 19, 1939
R. S. DICK

clerk - register

By *William D. ...*
Deputy

The State of Alabama }
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

TENNIE KNOWLES

COMPLAINANT

VS.

ERICE KNOWLES

RESPONDENT

I, O'BYRNE JONES

~~as Register and~~ Commissioner

have called and caused to come before me Tennie Knowles and O. Givens

witness es named in the Requirement for Oral Examination, on the 13th day of July

19 39, at the office of Beebe, Hall & Beebe,

in Bay Minette, Alabama, and having first sworn said witness es to speak the

truth, the whole truth, and nothing but the truth, the said Tennie Knowles

doth depose and say as follows:

My name is Tenie Knowles. I am a resident of Seminole, in Baldwin County, Alabama, and am over twenty-one years of age. The Respondent, Erice Knowles, is over twenty-one years of age and a resident of Baldwin County, Alabama.

The Respondent and I were married at Seminole, in Baldwin County, Alabama, on June 20th, 1932, and we lived together as husband and wife, in Baldwin County, Alabama, until June 1st, 1938; that sometime after we were married the Respondent began drinking rather heavily and began to curse and abuse me, which condition grew worse from time to time; that on several occasions, during one of his fits, he would slap or knock me, and on one particular occasion whipped me with a leather belt; that his conduct was such as to render it absolutely impossible for me to live with him; I often talked and pleaded with him to change, so that we could go ahead and live together in peace, but in spite of this he continued; that his conduct was such that I knew that if I lived with him longer, he would continue to abuse and do further violence to my person, which would, of course, necessarily endanger my life and health;

We have no children. Since June 1st, 1938, the Respondent has contributed absolutely nothing toward my support.

Tennie Knowles

ORAL EXAMINATION

I, O'BYRNE JONES, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition s. on Oral Examination was taken down in writing by me in the words of the witnesss and read over to them and they signed the same in the presence of myself and Hubert M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proof made before me of the identity of said witnesses; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 13th day of July 1939.

O'Byrne Jones (L. S.)
Commissioner.

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

TENITE KNOWLES,

COMPLAINANT

vs.

ERICA KNOWLES,

RESPONDENT

ORAL DEPOSITION

Filed July 13, 1939

R. S. Duck Register
By - Pauline Thompson, Deputy
RECORDED IN

Record _____

Vol. _____ Page _____

Register _____

O. GIVENS, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES
AND SAYS:

My name is O. Givens. I live at Seminole, in Baldwin County, Alabama. I have known the Complainant and the Respondent, in the above cause, during the past nine or ten years. I knew them while they lived together as husband and wife, within about four miles from my place in Seminole. The Respondent was, at that time, working with my brother, E. L. Givens. I have had occasions to visit around where they lived, and while I have never seen the Respondent actually abuse or strike the Complainant, I have, on several occasions, heard of him abusing and actually striking the Complainant. I know that he has been away from Seminole something like a year now. The Complainant is now living with her father, at Seminole.

O. Givens

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 193_____

TENIE KNOWLES _____, Complainant

Vs.

ERICE KNOWLES _____, Defendant

To R. S. DICK _____, Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Beebe, Hall & Beebe,

_____ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Beebe, Hall & Beebe
Solicitor for Complainant.

TENNIE KNOWLES

vs.

ERICE KNOWLES

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,
and testimony of Tennie Knowles and O. Givens, and Request for Decree in
Vacation.

and in behalf of Defendant upon Decree Pro Confesso on Personal Service

R. S. Dorch

Register.

By: Sandliss Thompson, Deputy

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

TENIE KNOWLES,

vs.

ERICE KNOWLES,

NOTE OF TESTIMONY

Filed in Open Court this 13

day of July 1939

R. B. Ditch

REGISTER

MOORE PRINTING CO., EAY BINETTE, ALA. By: Raulice Thompson

RECORDED

No. _____ Page _____

The State of Alabama,
Baldwin County.
CIRCUIT COURT, IN EQUITY

TENIE KNOWLES

Vs.

ERICE KNOWLES

**REQUEST FOR DECREE IN
VACATION**

Filed July 13, _____, 1939

R. S. Duch

Register.

By: Pauline Thompson
Deputy

Recorded in _____ Record

Vol. _____ Page _____

Register.