

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

Comes CARRIE LEE DODSON and humbly complaining against
HENRY DODSON, respectfully shows unto your Honor as follows:

FIRST:

That your complainant, Carrie Lee Dodson, and the said
Henry Dodson are both over the age of twenty-one years and your
complainant is a resident of Bay Minette, Baldwin County, Alabama,
having resided in Baldwin County for more than six years next pre-
ceding the filing of this bill of complaint; that Henry Dodson is
at present living in Mobile, Mobile County, Alabama, his street
address being 57 N. Water Street.

SECOND:

That your complainant and the said defendant were married
February 19, 1918, in Mobile, Alabama, and lived together as husband
and wife until about 1928, when the said Henry Dodson voluntarily
and without just cause abandoned your complainant and refused to
live with your complainant thereafter, and since said abandonment
has failed and refuses to support your complainant.

WHEREFORE, your complainant prays that your Honorable
Court will take jurisdiction of this cause and by appropriate pro-
cess make the said Henry Dodson a party defendant hereto, and re-
quire 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 upon a final hearing of
this cause your Honor will make and enter a decree, forever dis-
solving the bonds of matrimony existing between your complainant
and the said Henry Dodson, and your complainant prays for such
other, further or different relief as in equity and good con-
science she is entitled to receive.

Beebe Hall & Beebe
Solicitors for Complainant.

FOOT NOTE:

The defendant is required to answer each and every alle-

gation contained in this bill of complaint, from Paragraph
FIRST to SECOND inclusive, but not under oath, oath being hereby
expressly waived.

Beche Hall & Beche
Solicitors for Complainant.

FILED
F. B. DODGE
CLERK - REGISTER
APR 12 1938

551

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon HENRY DODSON

57 N. Water Street, Mobile, Ala.,
of Mobile 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

CARRIE LEE DODSON

against said HENRY DODSON

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 19th day of

June, 1939.

R. S. DUCK
clerk, - register

By Pauline Thompson, Register
Deputy

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

**CHANCERY EXECUTION
BILL OF COSTS**

Carrie Lee Dodson

No. 551

Vs.

Plaintiff

Henry Dodson

Defendant

FEES OF REGISTER		Dollars	Cents	Brought Forward	\$
Filing each bill and other papers	\$ 10		80	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 subpoena	50		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Issuing each copy thereof	40			Each notice sent by mail to creditor	15
Entering each return thereof	15		15	Filing, receipting for and docketing each claim, etc.	25
For each order of publication	1 00			For all entries on subpoena docket, etc.	50
Issuing writ of injunction	1 50			For all entries on commission docket, etc.	50
For each copy thereof	50			Making final record, per 100 words	15
Entering each return thereof	15			Certified copy of decree	1 00
Issuing Writ of Attachment	1 00			Report of divorce to State Health Office (Acts 1915)	50
Entering each return thereof	15			Total Fees of Register	9 80
Docketing each case	1 00	1 00		FEES OF SHERIFF	
Entering each appearance	25		25	<i>W.R. Stuart</i> Serving and returning subpoena on deft.	\$ 1 50
Issuing each decree pro confesso on per. ser.	1 00			Serving and returning subpoena for witness	65
Issuing each decree pro confesso on publica.	1 00			Levying attachment	3 00
Each order appointing guardian	1 00			Entering and returning same	25
Any other order by Register	50			Selling property attached	
Issuing commission to take testimony	50			Impanelling Jury	75
Receiving and filing	10			Executing writ of possession	2 50
Endorsing each package	10			Collecting execution for costs	1 50
Entering order submitting cause	50		50	Serving and returning sci. fa., each	65
Entering any other order of court	25			Serving and returning notice	65
Noting all testimony	50		50	Serving and returning writ of injunction	1 50
Abstract of cause, etc.	1 00		75	Serving and returning writ of exeat	1 50
Entering each decree	75			Taking and approving bonds, each	75
For every 100 words over 500	15			Collecting money on execution	
Taking account, etc.	3 00		1 80	Making deed	2 50
Taking testimony, etc.	15			Serving and returning application, etc.	1 00
Each report, 500 words or less	2 50			Serving attachment, contempt of court	1 50
For every 100 words over 500	15			Total Fees of Sheriff	3 25
Amount claimed less than \$500, etc.	2 00			RECAPITULATION	
Issuing each subpoena	25			Register's Fees	9 80
Witness certificate, each	25			Sheriff's Fees	3 25
Issuing execution, each	75		75	Commissioner's Fees	
Entering each return	15		15	Solicitor's Fees	
Taking and approving bond, each	1 00			Witness Fees	
Making copy of bill, etc.	15			Guardian Ad Litem	
Each notice not otherwise provided for	50			Printer's Fees	
Each certificate or affidavit, with seal	50			Trial Tax	3 00
Each certificate or affidavit, no seal	25			Recording Decree in Probate Court	
Hearing and passing on application, etc.	3 00			Total	\$ 16 05
Each settlement with receiver, etc.	3 00				
Examining each voucher of Receiver, etc.	10				
Examining each answer, etc.	3 00				
Recording resignation, etc.	75				
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 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 over \$20,000, 1-4 of 1 per ct.					
Sub Total Carried Forward					

The State of Alabama,

No. _____

Baldwin County.

Circuit Court, In Equity *Feb 17* Term, 19*40*

To Any Sheriff of the State of Alabama—GREETING:

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

Carrie Lee Dodson, Complainant, Defendant

you cause to be made the sum of *Sixteen & 05/100* Dollars,

which *was* Plaintiff

recovered of *Complainant* on the *18th* day of *December* 19*39*

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of *in cause of*

Carrie Lee Dodson vs Henry Dodson, Respondent as Dollars,

costs of suit, and have the same to render to the said *R B Duck, Register* and make return of this Writ and the execution thereof, according to law.

Interest from *193* to date of collection.

Witness my hand, this *17th* day of *February* 19*40*

R B Duck, Register.
By NE Smith, Deputy

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

Comes CARRIE LEE DODSON and humbly complaining against
HENRY DODSON, respectfully shows unto your Honor as follows:

FIRST:

That your complainant, Carrie Lee Dodson, and the said
Henry Dodson are both over the age of twenty-one years and your
complainant is a resident of Bay Minette, Baldwin County, Alabama,
having resided in Baldwin County for more than six years next pre-
ceding the filing of this bill of complaint; that Henry Dodson is
at present living in Mobile, Mobile County, Alabama, his street
address being 57 N. Water Street.

SECOND:

That your complainant and the said defendant were married
February 19, 1918, in Mobile, Alabama, and lived together as husband
and wife until about 1928, when the said Henry Dodson voluntarily
and without just cause abandoned your complainant and refused to
live with your complainant thereafter, and since said abandonment
has failed and refuses to support your complainant.

WHEREFORE, your complainant prays that your Honorable
Court will take jurisdiction of this cause and by appropriate pro-
cess make the said Henry Dodson a party defendant hereto, and re-
quire 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 upon a final hearing of
this cause your Honor will make and enter a decree, forever dis-
solving the bonds of matrimony existing between your complainant
and the said Henry Dodson, and your complainant prays for such
other, further or different relief as in equity and good con-
science she is entitled to receive.

Beebe Hall & Beebe
Solicitors for Complainant.

FOOT NOTE:

The defendant is required to answer each and every alle-

gation contained in this bill of complaint, from Paragraph
FIRST to SECOND inclusive, but not under oath, oath being hereby
expressly waived.

Beebe Hall & Beebe
Solicitors for Complainant.

CARRIE LEE DODSON,
Complainant,
vs.
HENRY DODSON,
Defendant.

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

Comes the defendant, Henry Dodson, and accepts service in the above entitled cause, and agrees hereby that the same may be set down for hearing without further notice to him. The defendant denies each and every allegation set out in the complainant's bill of complaint and demands strict proof thereof.

Henry Dodson
Defendant.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

CARRIE LEE DODSON, Complainant

vs.

HENRY DODSON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ ~~on~~ answer and waiver of notice and Testimony as noted by the Register, and upon consideration thereof, the Court is of the 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 that the said Carrie Lee Dodson is forever divorced from the said

Henry Dodson

for and on account of Abandonment

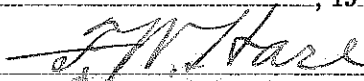
It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that CARRIE LEE DODSON, be, and she is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that complainant

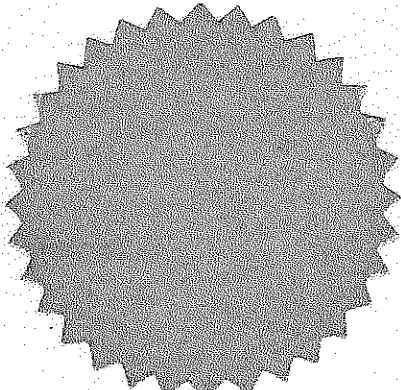
~~###~~ pay the cost herein to be taxed, for which execution may issue.

This 18th day of December, 19 39



Judge Circuit Court, in Equity.

I, R. S. DICK, Register of the Circuit Court for Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.



Witness my hand and seal this the 18th day

of _____, 19 _____

Register of Circuit Court, in Equity.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

~~CARRIE LEE DODSON,~~

Complainant

vs.

~~HENRY DODSON,~~

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~
~~and answer and waiver of notice~~ and Testimony as noted by the Register, and upon
consideration thereof, the Court is of the 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 here-
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and
that the said Carrie Lee Dodson
is forever divorced from the said

Henry Dodson

for and on account of Abandonment

It is further ordered, adjudged and decreed that neither party to this suit shall again marry
except to each other until sixty days after the rendition of this decree, and that if appeal is taken
within sixty days, neither party shall again marry except to each other during the pendency of said
appeal.

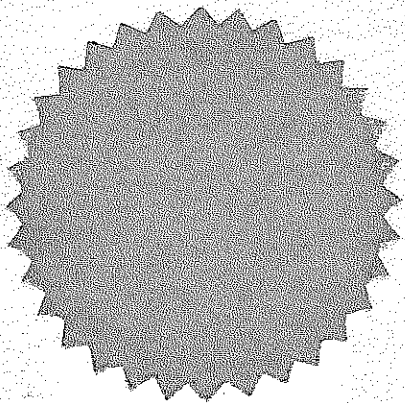
It is further ordered that CARRIE LEE DODSON,
be, and ~~she is~~ hereby permitted to again contract marriage upon the payment of the cost of
this suit.

It is further ordered that complainant
~~that~~ pay the cost herein to be taxed, for which execution may issue.

This _____ day of December, 19 30

Judge Circuit Court, in Equity.

I, R. S. DUCK, Register of the Circuit
Court for Baldwin County, Alabama, do hereby certify that the
foregoing is a correct copy of the original decree rendered by the
Judge of the Circuit Court in the above stated cause, which said
decree is on file and enrolled in my office.



Witness my hand and seal this the ~~23rd~~ _____ day
of _____, 19 _____

Register of Circuit Court, in Equity.

RECORDED 2-2-85

No. 551 Page

The State of Alabama
Baldwin County

In Circuit Court, In Equity

CARRIE LEE DODSON

vs. Complainant.

HENRY DODSON

Respondent.

DIVORCE DECREE

*Filed December 19, 1935
R. S. Dreck, Register*

Faint, illegible text from the reverse side of the document, appearing as bleed-through.

ANSWER

Answer.

Filed July 6th, 1939
R. S. DICK, Register;
BY: *Walter Morgan* Deputy

*Provision
Expenditure*

Receipt

RECORDED

Bill of Complaint

Filed June 19, 1939
R. S. DUCK

clerk, - register

By *Walter H. ...*
Deputy

FEB 17 1940

No. 551

The State of Alabama,
Baldwin County.

Circuit Court, In Equity.

Carrie Lee Dodson
My Mother

vs.

Jenny Dodson

CHANCERY EXECUTION
Fi. Fa.

Costs \$ 16.05

Total \$ 16.05

Fee Book _____ Page _____

Execution Docket _____ Page _____

Beale, Halls & Beale
Complainant's Solicitor.

FEB 17 1940

The State of Alabama,
Baldwin County.

ha..... 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 17th

day of February 1940

W. B. Steland
Sheriff

Execution Docket..... Page.....

Returned 4/17/40 200

Property of Carrie Lee
Dodson the Plaintiff

Award in Baldwin County
by W. B. Steland Sheriff

By Mrs. Steland

MOORE PRINTING CO., DAYTON, OHIO

The State of Alabama, }
Baldwin County.

By virtue of the within execution I have levied

Series of horizontal lines for recording details of the execution process.

57 Original
W. H. Hester

Henry Dodson, Speciality Co.,
% Marine Street,
Mobile, Ala.
Serve On 57 N. Water Street
Circuit Court of Baldwin County
IN EQUITY

THE STATE OF ALABAMA,
Baldwin County

No. 551

Received in office this 20th

day of June 1939

W. H. Hester
Sheriff.

Summons

Executed this 1 day of

CARRIE LEE DODSON,
Complainant,

July, 1939
by leaving a copy of the Summons with
Henry Dodson

VS.

Defendant

HENRY DODSON,
Respondent.

W. H. Hester
Sheriff

By Wm. Bennett
Deputy Sheriff

BEEBE, HALL & BEEBE
Solicitor for Complainant

Recorded in Vol. _____ Page _____

action contained in this bill of complaint, from paragraph
FIRST to SECOND inclusive, but not under oath, oath being hereby
expressly waived.

Barbara A. H. Jones

Solicitor for complainant.

Filed June 19 1939
R. S. DODK
clerk - register
By *William J. ...*
Deputy

THE STATE OF ALABAMA }
Baldwin County

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

CARRIE LEE DODSON

COMPLAINANT

VS.

HENRY DODSON

RESPONDENT

I, R. S. DUCK

as Register and Commissioner

have called and caused to come before me CARRIE LEE DODSON and OPHELIA MASSEY

witness^{es} named in the Requirement for Oral Examination, on the 16 day of Dec.
19 39, at the office of Register
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 CARRIE LEE DODSON and

OPHELIA MASSEY doth depose and say as follows:

My name is Carrie Lee Dodson. I am 36 yrs. old and a resident of Bay Minette, Baldwin County, Alabama and I have lived here continuously for more than eighteen years next preceding the filing of the bill of ~~the~~ complaint against Henry Dodson. I married Henry Dodson in Mobile, on 19th day of February, 1918 and we lived together as husband and wife continuously until on or about sometime in 1928 when he voluntarily and without just cause abandoned me and left Bay Minette and went Biloxi. I did not give him any reason whatsoever to leave me and even though he promised to send me he never did and he has never supported ~~me~~ since 1928. I have never refused to allow him to return and live with me as husband and wife since that date, however he has never offered to return, Nor send me money for support for me and my two children. The children were born to us during the time we lived together as husband and wife.

Carrie Lee Dodson

My name is Ophelia Massey. I am the mother of Carrie Lee Dodson and am a resident of Bay Minette, Baldwin County, Alabama. Carrie and Henry Dodson married at my home on February 19th, 1918, and there were born to the union two children. The oldest child being a girl about 18 and the youngest a boy about 12. Sometime in about 1928 Henry Dodson left Carrie Lee while they lived Bay Minette and went to Biloxi. He told Carrie at the time he would later send for her but he never did. He left Carrie Lee without just cause and voluntarily. Ever since he has been gone being more than ten years ago he has failed to give her any money or support of herself or her two children. Since then ~~has~~ Carrie and her two children have lived with me in my home. There was no reason or cause on the part of Carrie Lee for Henry to leave her. He did it voluntarily and since ~~then~~ he has been gone he has refused to return to her or to send for her and has also any financial help.

Ophelia Massey

ORAL EXAMINATION

I, R. S. DUCK, 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 witness ~~s~~ and read over to them and they signed the same in the presence of myself _____ at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness— or had proof made before me of the identity of said witness—; 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 16 day of December, 1939.

R. S. Duck

(L. S.)

No. 551 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

CARRIE LEE DODSON,

Complainant

Vs.

HENRY DODSON,

Respondent

ORAL DEPOSITION

Filed December 16, 1939

R. S. DUCK, Register

RECORDED IN

Record

Vol. _____ Page _____

Register

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. 551

Fall

Term, 1939

CARRIE LEE DODSON

, Complainant

Vs.

HENRY DODSON

, Defendant

To R. S. DUCK, 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.

CARRIE LEE DODSON,
Complainant.

vs.

HENRY DODSON,
Respondent.

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, _____
Testimony of Complainant and witness, Ophelia Massey; Request for
Decree in Vacation.

and in behalf of Defendant upon Answer and waiver

R. B. Duak

Register.

By I. E. Smith Deputy.

The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY

Carrie Lee Dodson,

Complainant,

Vs.

Harry Dodson,

Respondent.

**REQUEST FOR DECREE IN
~~VACATION~~**

Filed Dec. 16, 1939

R. S. DUCK

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

CARRIE LEE DODSON,

Complainant.

vs.

HENRY DODSON,

Respondent.

NOTE OF TESTIMONY

Filed in ~~Open~~ Court this 16th
day of December 1939

R. S. DICK

R. S. Dick

REGISTER