

596

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 **CLAY K. HUNT**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

~~% Marine Hospital, Norfolk, Va.~~  
of \_\_\_\_\_ 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

**GUSSIE HUNT**  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**CLAY K. HUNT**  
against said \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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 **28th** day of **November** **9**, 19**3**\_\_\_\_\_.

\_\_\_\_\_  
*R. S. Duck*, Register

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

GUSSIE HUNT,  
Complainant,  
VS.  
CLAY K. HUNT,  
Respondent.

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

Comes your Complainant, GUSSIE HUNT, and humbly complaining against the Respondent, CLAY K. HUNT, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant and Respondent are both bona fide residents of Baldwin County, Alabama, but that the Respondent is temporarily located at the Marine Hospital, Norfolk, Virginia; that they are both over twenty-one years of age.
2. That your Complainant and Respondent were married at Bay Minette, in Baldwin County, Alabama, on May 20th, 1934, and lived together as husband and wife, in Baldwin County, Alabama, until October 1st, 1939.
3. That on to-wit, October 1st, 1939, the Respondent cursed, threatened and abused the Complainant and threatened to do violence to her person; that the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him, he would carry out his threats and do violence to her person, which would necessarily endanger her life and health.
4. That there was born to said marriage between the Complainant and the Respondent two children: Vivian Hunt and Jerry Hunt, ages four and two respectively; that said children are now and have been all of their lives with your Complainant; that your Complainant is ready, able and willing to care and provide for said children; that the Respondent works on a boat and has no place to keep the children.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said CLAY K. HUNT 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 Respondant, CLAY K. HUNT; that a further decree may be made and entered awarding to your Complainant the custody, care and control of said minor children, namely: Vivian Hunt and Jerry Hunt; 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.

*Beulah Dore Dore*  
 Solicitors for Complainant.

FOOT NOTE:

The Respondent, CLAY K. HUNT, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 4, inclusive, but not under oath, oath being hereby expressly waived.

BILL OF COMPLAINT

CLAY K. HUNT,

vs.

CLAY K. HUNT,

Respondent.

Complainant.

*Beulah Dore Dore*  
 Solicitors for Complainant.

IN THE DISTRICT COURT OF  
 BATHING BEACH, VIRGINIA,  
 COUNTY OF  
 CHESAPEAKE.

*13 E. C. 200*  
*14 E. C. 200*  
*15 E. C. 200*  
*16 E. C. 200*  
*17 E. C. 200*  
*18 E. C. 200*  
*19 E. C. 200*  
*20 E. C. 200*

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

To Any Sheriff of the State of Alabama—GREETING:

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% Marine Hospital, Norfolk, Va.  
of \_\_\_\_\_ 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

GUSSIE HUNT

against said CLAY K. HUNT

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 28th day of November, 193 9.

R. S. Duck, Register

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

STATE OF ALABAMA,     )  
                                  )  
BALDWIN COUNTY.        )

Before me, the undersigned authority, in and for said County, in said State, personally appeared GUSSIE HUNT, who is known to me and who having been by me first duly sworn, deposes and says, that she is the Complainant in the case of Gussie Hunt vs. Clay K. Hunt, in the Circuit Court of Baldwin County, Alabama, in Equity; that the said Clay K. Hunt is over twenty-one years of age and a non-resident of the State of Alabama, his present address being C/o Marine Hospital, Norfolk, Virginia.

Gussie Hunt

Sworn to and subscribed before me  
this 23<sup>rd</sup> day of November,  
1939.

W. B. Jones  
Notary Public, Baldwin County, Ala.

GUSSIE HUNT,  
Complainant,  
VS.  
CLAY K. HUNT,  
Respondent.

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

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Solicitors for Complainant.

FOOT NOTE:

The Respondent, CLAY K. HUNT, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 4, inclusive, but not under oath, oath being hereby expressly waived.

  
Solicitors for Complainant.

# CHANCERY EXECUTION

## BILL OF COSTS

No. **596. Gussie Hunt** Vs. **Clay K Hunt.** Plaintiff  
Defendant

FEES OF REGISTER	Dollars	Cents	Brought Forward	\$	¢
Filing each bill and other papers.....	\$	10		4	30.
Issuing each subpoena.....		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	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.		
Entering each return thereof.....		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	3 45
Issuing Writ of Attachment.....	1	00	Certified copy of decree.....	1	00
Entering each return thereof.....		15	Report of divorce to State Health Office .....	50	
Docketing each case.....	1	00	(Acts 1915)		
Entering each appearance.....		25	Total Fees of Register.....	8	75,
Issuing each decree pro confesso on per. ser. ....	1	00	FEES OF SHERIFF		
Issuing each decree pro confesso on publication .....	1	00	Serving and returning subpoena on deft. ....	\$1	50
Each order appointing guardian.....	1	00	Serving and returning subpoena for witness .....	65	
Any other order by Register.....		50	Levying attachment.....	3	00
Issuing commission to take testimony....		50	Entering and returning same.....	25	
Receiving and filing.....		10	Selling property attached.....		75
Endorsing each package.....		10	Impaneling Jury.....	75	
Entering order submitting cause.....		50	Executing writ of possession.....	2	50
Entering any other order of court.....		25	Collecting execution for costs.....	1	50
Noting all testimony.....		50	Serving and returning sci. fa., each	65	1 50
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.....		2 50
Each report, 500 words or less.....	2	50	Making deed .....	2	50
For every 100 words over 500.....		15	Serving and returning application, etc. ....	1	00
Amount claimed less than \$500, etc.....	2	00	Serving attachment, contempt of court .....	1	50
Issuing each subpoena.....		25	Total Fees of Sheriff.....	1	50.
Witness certificate, each.....		25	RECAPITULATION		
Issuing execution, each .....		75	Register's Fees .....	8	75.
Entering each return .....		15	Sheriff's Fees .....	1	50.
Taking and approving bond, each .....	1	00	Commissioner's Fees .....		
Making copy of bill, etc.....		15	Solicitor's Fees .....		
Each notice not otherwise provided for		50	Witness Fees .....		
Each certificate or affidavit, with seal...		50	Guardian Ad Litem.....		
Each certificate or affidavit, no seal.....		25	Printer's Fees .....		
Hearing and passing on application, etc.	3	00	Trial Tax .....	3	00
Each settlement with receiver, etc.....	3	00	Recording Decree in Probate Court....		
Examining each voucher of Receiver, etc.		10	Total.....	13	35
Examining each answer, etc.....	3	00			
Recording resignation, etc.....		75			
Entering each cert. 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, 1½ per ct.; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, ¼ of 1 per ct.					
Sub Total Carried Forward.....	43	0			

**The State of Alabama, } No. 596.**  
**Baldwin County. } Circuit Court, In Equity S<sup>up</sup>rt. Term, 194 2**

To Any Sheriff of the State of Alabama—GREETINGS:  
 You are hereby commanded, That of the goods and chattels, lands and tenements of \_\_\_\_\_  
Gussie Hunt. Compt. Defendant.....  
 you cause to be made the sum of 13 35 Costs only Dollars,  
 which Case Dismissed. Plaintiff.....  
 recovered of \_\_\_\_\_ on the 28th day of Sept. 194 2  
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of \_\_\_\_\_  
\$13 35 Dollars,  
 costs of suit, and have the same to render to the said R S Duck.  
 and make return of this Writ and the execution thereof, according to law.  
 Interest from \_\_\_\_\_ 194 \_\_\_\_\_ to date of collection.  
 Witness my hand, this 23 day of Sept. 194 2  
R S Duck, Register.