

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 Minnie Lee Salter

( Six miles East of Summerdale on Greenwood School House Road. )

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 H. A. Salter

against said Minnie Lee Salter

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, M. A. Stone, Register of said Circuit Court, this 14th day of

November 1934

M. A. Stone Register

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

AMX Reg 91

~~NOV 10 1934~~

SERVE ON \_\_\_\_\_  
Circuit Court of Baldwin County  
IN EQUITY

No. 95  
SUMMONS

H. A. Salter

VS.

Winnie Lee Salter

A. H. Crockett  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

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THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this \_\_\_\_\_

day of ~~NOVEMBER 10~~ 193 \_\_\_\_\_

SHERIFF

Executed this 16th day of  
November 1934  
by leaving a copy of the within Summons with

Winnie Lee Salter

Defendant

Wm Stewart  
Sheriff

By W. H. Wilkerson  
Deputy Sheriff

H. A. SALTER,  
Complainant,  
VS.  
MINNIE LEE SALTER,  
Respondent.

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

And now come BEEBE & HALL, Solicitors of record  
for the Respondent and Cross Complainant, and hereby with-  
draw their appearance and pleadings in the above cause.

Beebe & Hall  
Solicitors for Respondent.

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~~XXXXXXXXXX~~  
XXXXXX

Miss

February 28 1935

Richard S. Duerk  
Hagerstown

H. A. SALTER,  
 Complainant,  
 VS.  
 MINNIE LEE SALTER,  
 Respondent.

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

This cause coming on to be heard was submitted on the original bill of complaint on behalf of the Complainant, answer of the Respondent and testimony and pleadings 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 the Respondent be and the same are hereby dissolved and the complainant is forever divorced from the Respondent on the ground of voluntary abandonment.

IT IS FURTHER ORDERED that the said H. A. SALTER and/or MINNIE LEE SALTER be and they are hereby permitted to again contract marriage upon the payment of the cost of court in this cause.

IT IS FURTHER ORDERED that the said H. A. SALTER pay the cost herein taxed, for which execution may issue.

IT IS FURTHER ORDERED that the said H. A. SALTER shall not again marry, except to the said Minnie Lee Salter, until sixty days after this date, and that if an appeal is taken within sixty days, he shall not marry again, except to said Minnie Lee Salter, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, this \_\_\_\_\_ day of February, 1935.

Judge of the Circuit Court of  
 Baldwin County, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY.

I, ROBERT S. DUCK, Clerk of the Circuit Court of Baldwin County, Alabama, and Register in Chancery, hereby certify that the foregoing is a full, true, correct and complete copy of the decree of divorce in the case of H. A. Salter vs. Minnie Lee Salter, as the same appears of record in my office.

IN WITNESS WHEREOF, I have hereunto set my hand and seal of office on this the \_\_\_\_\_ day of \_\_\_\_\_, 1935.

Clerk of the Circuit Court  
of Baldwin County, Alabama,  
and Register in Chancery.

H.A. Salter

vs.

Minnie Lee Salter

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, \_\_\_\_\_  
Oral Depositions of H. A. Salter and Robert Nims

and in behalf of Defendant upon \_\_\_\_\_  
Demurrer and Cross Bill

*Robert J. Deak*  
Register.

STATE OF ALABAMA  
COUNTY OF BALDWIN.

In the Circuit Court of Baldwin County.

H. A. Salter

vs.

Minnie Lee Salter.

Bill for Divorce.

To the Honorable F. W. Hare, Judge of the Circuit Court of Baldwin County, Alabama. In Equity sitting.

Now comes W. A. Salter and humbly complaining against Minnie Lee Salter respectfully shows unto your Honor as follows:

First.

That your complainant and the defendant herein, Minnie Lee Salter, are both over the age of twenty one years. That they are residents of Baldwin County,, Alabama.

Second.

That on the 1<sup>st</sup> day of October, 1917, your complainant and the said Minnie Lee Salter, the defendant herein, intermarried in due form of law and have been ever since, and now are, husband and wife. That during the month of October 1930, defendant left, deserted and abandoned complainant without just cause, and has since that time continuously remained away from him.

Wherefore, the premises considered, your complainant prays that the bonds of matrimony between him and the defendant, Minnie Lee Salter, be dissolved; and for such other and further relief as to your Honor may seem right and proper.

  
Attorney for Complainant.

The defendant, Minnie Lee Salter, is required to answer every allegation of the foregoing complaint, but not under oath. Oath is hereby expressly waived.

  
Attorney for Complainant.



Copy  
J. J. J.

Mrs. Delta lives six  
miles east of Sumner Delta  
in Government Suburb House  
Road.

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Filed Apr. 14-1934  
Mr. A. J. Brown  
Progr. 100

H. A. SALTER,  
Complainant,  
VS.  
MINNIE LEE SALTER,  
Respondent.

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

This cause coming on to be heard was submitted on the original bill of complaint on behalf of the Complainant, answer of the Respondent and testimony and pleadings 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 the Respondent be and the same are hereby dissolved and the complainant is forever divorced from the Respondent on the ground of voluntary abandonment.

IT IS FURTHER ORDERED that the said H. A. SALTER and/or MINNIE LEE SALTER be and they are hereby permitted to again contract marriage upon the payment of the cost of court in this cause.

IT IS FURTHER ORDERED that the said H. A. SALTER pay the cost herein taxed, for which execution may issue.

IT IS FURTHER ORDERED that the said H. A. SALTER shall not again marry, except to the said Minnie Lee Salter, until sixty days after this date, and that if an appeal is taken within sixty days, he shall not marry again, except to said Minnie Lee Salter, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, this 28<sup>th</sup> day of February, 1935.

  
Judge of the Circuit Court of  
Baldwin County, Alabama.

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~~\_\_\_\_\_~~  
purch

H. A. SALTER,

Complainant,

VS.

LETTIE LEE SALTER,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN CHANCERY.

DECREE OF DIVORCE.

Filed this 28 day of Feb.  
1935  
Robert L. Shuler  
CLERK.

*Decree.*

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STATE OF ALABAMA  
COUNTY OF BALDWIN.

In the Circuit Court of Baldwin County.

H. A. Salter  
vs.  
Minnie Lee Salter.

Bill for Divorce.

To the Honorable F. W. Hare, Judge of the Circuit Court of Baldwin County, Alabama. In Equity sitting.

Now comes W. A. Salter and humbly complaining against Minnie Lee Salter respectfully shows unto your Honor as follows:

First.

That your complainant and the defendant herein, Minnie Lee Salter, are both over the age of twenty one years. That they are residents of Baldwin County, Alabama, *and have been for more than seven years.*

Second.

That on <sup>or about</sup> the 1<sup>st</sup> day of October, 1917, your complainant and the said Minnie Lee Salter, the defendant herein, intermarried in due form of law and have been ever since, and now are, husband and wife. That during the month of October 1930, defendant left, deserted and abandoned complainant without just cause, and has since that time continuously remained away from him.

Wherefore, the premises considered, your complainant prays that the bonds of matrimony between him and the defendant, Minnie Lee Salter, be dissolved; and for such other and further relief as to your Honor may seem right and proper.

*A. H. Smith*  
Attorney for Complainant.

The defendant, Minnie Lee Salter, is required to answer every allegation of the foregoing complaint, but not under oath. Oath is hereby expressly waived.

*A. H. Smith*  
Attorney for Complainant.

Mr. ~~Wright~~  
Belmont County, Ohio.

N. D. Dalton  
H.  
Minnie Lee Dalton.  
Bill for Dinner.

Oct. 20, 14-1904  
Mr. A. Stone  
Weymouth

A. W. Bennett

Attorney for Compliments.

The State of Alabama }  
 Baldwin County } Circuit Court of Baldwin County, Alabama,  
 (In Equity)

H. A. Salter COMPLAINANT

vs.

Minnie Lee Salter RESPONDENT

I, Anna Belle Hand

as Register and Commissioner

have called and caused to come before me H. A. Salter and Robert Nims

witnesses named in the requirement for Oral Examination, on the 18th day of February  
 1935, at the office of Robert S. Duck, Register.,  
 in Bay Minette, Alabama, and having first sworn said witnesses to speak the  
 truth, the whole truth, and nothing but the truth, the said  
 H. A. Salter doth depose and say as follows:

H. A. Salter:

*My name is*  
 My H. A. Salter. I am the complainant in the  
 above cause. I am over 21 years of age and a resident of Baldwin  
 County, and have been for more than three years next proceeding the  
 filing of the bill of complaint in this cause. The Respondent,  
 Minnie Lee Salter, is over 21 years of age and a resident of  
 Baldwin County Alabama. Minnie Lee Salter and I were married on  
 October 1st, 1917, and lived together until October, 1930 when  
 the said Minnie Lee Salter voluntarily deserted and abandoned me,  
 and that she has remained away voluntarily and continuously since  
 that time. We were living in Baldwin County at the time she went  
 away. Robert Nims

*H. A. Salter*  
 \_\_\_\_\_

ORAL EXAMINATION

I, Anna Belle Hand ~~as Register and~~ Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and A.H. Crovatt, and H. 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 18th day of February 1935.

Anna Belle Hand (L. S.)

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No. 95 Page

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

A. O. Salter

COMPLAINANT

VS.

Minnie Lee Salter

RESPONDENT

ORAL DEPOSITION

Filed February 18, 1935

Robert S. Dwyer, Register.

RECORDED IN

Record

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Register

Robert Nims, a witness for the Complainant

being first duly sworn, says:

My name is Robert Nims. I live at Summerdale ,  
in Baldwin County, Alabama. I know H. A. Salter and Minnie Lee  
Salter and have known them for about seven years. I know that H. A.  
Salter and Minnie Lee Salter lived together as Husband and Wife  
near Summerdale in Baldwin County, Alabama until the latter part of  
the year 1930; That the said Minnie Lee Salter at that time left  
H. A. Salter , and has lived separate from him <sup>since</sup> at that time. I  
know that they have not lived together as husband and wife since 1930.

Robert Nims



H. A. SALTER,  
Complainant,  
VS.  
MINNIE LEE SALTER,  
Respondent.

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

Comes the Respondent in the above styled cause and demurs to the Plaintiff's complaint heretofore filed in this cause and for grounds thereof says:

ONE:

That there is no equity in the bill.

TWO:

That it is not alleged how long the parties have been residents of Baldwin County, Alabama.

The Respondent, without waiving the above, demurrers but insisting thereon separately and severally, for answer to the Complainant's bill of complaint and to each count thereof separately and severally says:

FIRST:

That she admits that both she and the complainant are residents of Baldwin County, Alabama, over twenty one years of age.

SECOND:

That she admits that she and the complainant are husband and wife, having married on or about, to-wit, October 1st, 1917; that she denies the allegation that she, in October, 1930, deserted and/or abandoned the complaint/<sup>ant</sup>without just cause and/or she has remained away voluntarily since that time.

THIRD:

That she denies each and every allegation contained in Complainant's bill of complaint, not herein specifically admitted,

and demands strict proof of the same.

And further answering the Complainant's bill of complaint, the Respondent says:

(a) That she is now and has been for several years living near Summerdale, in Baldwin County, Alabama; that she has no means of supporting herself and the three minor children by the complainant, and that she has no money with which to employ counsel to represent her in this cause.

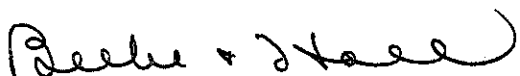
(b) That the three minor children are now, and have been all their lives, living with the complainant, and that she has no way to care and provide for them.

(c) That the Respondent is an able bodied man, capable of providing for himself, Complainant, and their minor children (3).

WHEREFORE the premises considered, Respondent prays that your Honor will make and accept this as her cross bill and by proper process make the Complainant, H. A. SALTER, Cross Respondent to the Complainant's cross bill and require him to plead, answer or demur to the same within the time and under the penalties prescribed by law;

That your Honor will order a reference to determine what is just and reasonable alimony pendente lite to be paid to the Complainant, and also a reasonable attorney's fee.

Complainant further prays that upon the final hearing of this cause your Honor will give and grant unto her such permanent alimony as may seem meet and proper. Complainant prays for 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.

  
Solicitors for Respondent and  
Cross Complainant.

FOOT NOTE:

The Complainant and Cross Respondent is required to answer each and every allegation contained in the Respondent's Cross Bill, in paragraphs (a) to (c), inclusive, but not under oath, oath being hereby expressly waived.

*Reelie + Hall*

Solicitors for Respondent  
and Cross Complainant.

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~~CONFIDENTIAL~~  
copy

H. A. SALLER,  
Complainant,

VS.

MINNIE LEE SALLER,  
Respondent.

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

DEMURRER AND CROSS BILL.

Filed this the 14 day of  
December, 1934.  
*J. O. Stone*  
Clerk.