

371

Anna Heidel Haskew, )  
Complainant. )  
-vs- )  
Clarence Frederick Haskew, )  
Respondent. )

IN THE CIRCUIT COURT - EQUITY SIDE  
STATE OF ALABAMA,  
BALDWIN COUNTY.

FINAL DECREE.

This cause, under order of the court made and duly entered on February 3rd, 1930, comes on to be heard and is submitted for final decree upon the Original Bill of Complaint, Answer of Respondent to Original Bill of Complaint and Testimony and evidence 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 her said bill; IT IS, THEREFORE,

ORDERED, ADJUDGED AND DECREED by the court that the bonds of matrimony heretofore existing between the complainant, Anna Heidel Haskew, and the respondent, Clarence Frederick Haskew, be and the same hereby are dissolved and the said Anna Heidel Haskew be and she hereby is forever divorced from the said Clarence Frederick Haskew for and on account of actual violence committed on her person, attended with danger to life or health, as alleged in the Bill of Complaint, IT IS FURTHER,

ORDERED, ADJUDGED AND DECREED that the complainant, Anna Heidel Haskew, have and she hereby is awarded the custody, care and control of Velma Haskew, Norman Haskew and Cleo Haskew, *until further orders of the Court,* she being by the court deemed and hereby adjudged to be a fit and proper person to have the care, custody and control of said children, and the said respondent being by the court deemed and is hereby adjudged to be an unfit person to have the custody, care and control of said children, IT IS FURTHER,

ORDERED, ADJUDGED AND DECREED that the said Anna Heidel Haskew be and she hereby is permitted to again contract the marriage relation, provided that she shall not again marry except to the said Clarence Frederick Haskew until sixty days after the date hereof,



(Page Two)

and provided further that if an appeal is taken within said sixty days, she shall not again marry, except to the said Clarence Frederick Haskeu, during the pendency of said appeal. IT IS FURTHER,

ORDERED, ADJUDGED AND DECREED that the said respondent pay the costs of this cause, for which execution may issue, but if such execution is returned "no property found", then the complainant shall pay such costs for which execution may issue against her.

Done at Chambers, Monroeville, Alabama, this February 20<sup>th</sup>,

1930.

*F. W. Hare*

Judge of the 21st Judicial Circuit.

LAW OFFICES  
WORBORNE STONE

Anna Heidel Haskew,  
Complainant,  
VS  
Clarence Frederick Haskew,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
EQUITY SIDE

FINAL DECREE

This cause, under order of the court made and duly entered on February 3rd, 1930, comes on to be heard and is submitted for final decree upon the Original Bill of Complaint, Answer of Respondent to Original Bill of Complaint and Testimony and evidence 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 her said bill; IT IS THEREFORE,

ORDERED, ADJUDGED AND DECREED by the court that the bonds of matrimony heretofore existing between the complainant, Anna Heidel Haskew, and the respondent, Clarence Frederick Haskew, be and the same hereby are dissolved and the said Anna Heidel Haskew be and she hereby is forever divorced from the said Clarence Frederick Haskew for and on account of actual violence committed on her person, attended with danger to life or health, as alleged in the Bill of Complaint, IT IS FURTHER,

ORDERED, ADJUDGED AND DECREED that the complainant, Anna Heidel Haskew, have and she hereby is awarded the custody, care and control of Velma Haskew, Norman Haskew and Cleo Haskew until further orders of the Court, she being by the court deemed and hereby adjudged to be a fit and proper person to have the care, custody and control of said children, and the said respondent being by the court deemed and is hereby adjudged to be an unfit person to have the custody, care and control of said children, IT IS FURTHER,

ORDERED, ADJUDGED AND DECREED that the said Anna Heidel Haskew be and she hereby is permitted to again contract the marriage relation, provided that she shall not again marry except to the said Clarence Frederick Haskew until sixty days after the date hereof, and provided further that if an appeal is taken within said sixty days, she shall not again marry, except to the said Clarence Frederick Haskew, during the pendency of said appeal. IT IS FURTHER,

ORDERED, ADJUDGED AND DECREED that the said respondent pay the costs of this cause, for which execution may issue, but if such execution is returned "no property found", then the complainant shall pay such costs for which execution may issue against her.

Done at Chambers, Monroeville, Alabama, this February 20th, 1930.

/s/ F. W. Hare  
Judge of the 21st Judicial  
Circuit



VS

EQUITY SIDE.

CLARENCE FREDERICK HASKEW .

To The Hon. John D Leigh, Judge of the Circuit Court, as Chancellor in Equity.

ONE

Your Oratrix Anna Heidel Haskew, respectfully represents that she is now and has been continuously for more than Three years next immediately preceding the filing of this Bill of Complaint, a Bona Fide resident of Baldwin County, State of Alabama; that she is over the age of 21 years, and that Clarence Frederick Haskew is a resident of Baldwin County, State of Alabama, and is over the age of 21 years.

TWO

That on to wit during the month of January 1917 at Abilene Texas, she was married to Respondent Clarence Frederick Haskew, and immediately removed to Stockton Baldwin County Alabama, where they have resided ever since.

THREE

That said respondent Clarence Frederick Haskew has repeatedly and often choked, beat, struck and abused Oratrix and has committed actual violence on her person attended with danger to life and health and that from his conduct towards her there is reasonable apprehension of actual violence on her person attended with danger to life and health.

FOUR.

That in May 1922 he choked and beat her almost into a state of insensibility, and that on December 23rd? 1922 he struck her repeatedly with his fist and bruised her severely, from the effects of which she was confined to her bed with fever.

FIVE

That there were born of said marriage the following children. Velma Haskew five years of age, Norman Haskew two years of age. Cleo Haskew one year old, all of whom reside with Oratrix .

Premises considered your Oratrix prays that a summons be issued directed to the said Clarence Frederick Haskew requiring him to appear, plead, answer or demur to this her bill of complaint within the time required by law; and that upon a final hearing Your Honor will grant Your Oratrix an absolute decree of divorce from the said



Clairence Frederick Haskew, and also grant and decree that Oratrix shall have the custody of said minor children Velma Haskew-- Norman Haskew -- and Cleo Haskew , and that such other relief may be granted to Your Orator as Your Honor may deem proper, just and meet, and as in duty bound she will ever pray. Etc.

Anna Heidel Haskew

Oratrix.

Stoue & Stoue

Solicitors for Oratrix

Foot Note.

The Respondent is required to answer each and every paragraph of the above bill of complaint from One to ~~five~~ inclusive. but not under oath as Oath is hereby expressly waived.

Stoue & Stoue

Solicitors for Oratrix.

-----



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 Clarence Frederick Haskew,

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 Anna Heidel Haskew,

against said Clarence Frederick Haskew,

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, T. W. Richerson, Register of said Circuit Court, this 2nd, day of Febuary,

.....1923,

*T. W. Richerson*

Register.

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



2 Original

Serve on \_\_\_\_\_  
Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

Anna Heidel Haskew,

vs.

Clarence Frederick Haskew.

*address*  
Baldwin Co Secy  
Recort.

RECORDED

Stone and Stone,  
Solicitor for Complainant

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

Received in office this 2nd,  
day of February, 1923.

*W. R. Stewart*  
Sheriff

Executed this 30 day of  
February 1923

by leaving a copy of the within summons with

*W. R. Stewart*  
Defendant  
Sheriff

By \_\_\_\_\_  
Deputy Sheriff







-----x  
 ANNA HEIDEL HASKEW,            )            IN THE CIRCUIT COURT-EQUITY SIDE.  
                   Complainant.            )            STATE OF ALABAMA.  
                   -vs-                    )            BALDWIN COUNTY.  
 CLARENCE F. HASKEW,            )            .  
                   Defendant.            )            .  
 -----x

TO THE HONORABLE, TL W. RICHERSON, REGISTER IN CHANCERY, CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY.

Comes the complainant, Anna Heidel Haskew, by Stone & Stone, her Solicitors of Record in the above styled cause, and prays leave of this court to amend the original bill of complaint in this cause filed by her by adding or inserting, after paragraph designated "FIVE" in original bill, the following paragraph, designated and in words and figures, as follows:-

"SIX. That the said respondent, Clarence Frederick Haskew is an able-bodied and healthy man and is able to and does earn a good living; that the complainant is without independent means of support and owing to the small children who require her constant attention she is unable to earn a living for herself and said children but that the respondent is well able to earn a living for himself and also able to properly support and maintain your oratrix and their said children in a manner suitable to their condition and state in life."

and also by inserting in the prayer, in the fourth line thereof on the first page of said original bill, after the words "required by law" and before the words "and that upon a final hearing, etc.,"

The following:-

".....; that your Honor will order and direct and decree that a reference be held by and before the Register of this Court to ascertain the value of the property and the earning capacity of the respondent, Clarence Frederick Haskew, and to ascertain a suitable amount to be paid by the said respondent to your Oratrix as alimony pendente lite, attorneys fees for the prosecution of this cause and permanent alimony and that such findings by the Register on this reference be reported to your Honor in accordance with the rules and practices of this Honorable Court; that your Honor will render, adjudge and decree to the Oratrix a suitable amount to be paid hereby the respondent as alimony pendente lite and as attorneys fees in this cause;"

and also by inserting in the prayer, in the third line thereof on the second page of said original bill, after the words "...and Cleo Haskew" and before the words "...and that such other relief may be granted", the following:-

".....and that your Honor will render adjudge and decree unto your Oratrix a suitable amount to be paid to her by the respondent, Clarence Frederick Haskew, or out of the estate of the respondent, Clarence Frederick Haskew, as permanent alimony and for



-page two-

the support of your Oratrix and the said children, such amount to be suitable to the condition and state in life of your Oratrix and the said children."

ORATRIX prays that a day be set for the hearing of this application to amend, that a copy of the proposed amendments together with notice of the hearing of this application be given to the opposite party, the said respondent, Clarence Frederick Haskew or Hon. Wm. S. Anderson, his Solicitor of Record.

*Howes Sec.*

Solicitors for Oratrix

RECORDED



TRANSCRIPT OF THE MINUTES OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, WEDNESDAY, JUNE 6TH, 1923.

No. 31. The State vs. Clarence Haskew (Assault & Battery) June 6, 1923

✓ Motion to strike the Complaint as filed by Solicitor, overruled.  
Demurrers based on same grounds overruled.

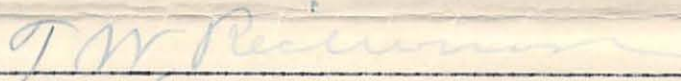
Cómes Hon. L. S. Biggs, Solicitor, who prosecutes for the State of Alabama, and also came the Defendant, in his own proper person and by attorney, and the said Defendant being duly arraigned upon said indictment, for his plea thereto, says Not Guilty.

Thereupon came a jury of good and lawful men, to-wit: D. P. Eddins and eleven others, who, being impaneled and sworn according to law, upon their oaths do say: We, the jury, find the Defendant guilty and assess a fine of Two Hundred and Fifty Dollars. Now comes the Defendant together with George W. Haskew and C. H. Bryars, all of whom confess themselves indebted to the State of Alabama in the sum of Two Hundred and Fifty Dollars for the fine and the costs of this cause, for which let execution issue, each waiving their exemptions to personal property.

-----  
THE STATE OF ALABAMA,  
BALDWIN COUNTY.

I, T. W. Richerson, Clerk of the Circuit Court of Baldwin County, Alabama, do hereby certify that the within is a true and correct copy of the judgment entry and sentence in the within stated cause, The State of Alabama vs. Clarence Haskew.

Witness my hand, this 30th day of August, 1929.

  
\_\_\_\_\_  
Clerk of the Circuit Court of Baldwin County.



THE STATE

--VS--

CLARENCE HASKEW.

*Offered by Law.  
pleaded and*

*Filed 8/30/29*

*Forfeiture  
Registered*

-----X  
ANNA HEIDEL HASKEW, )  
Complainant. ) IN THE CIRCUIT COURT-EQUITY SIDE.  
-vs- ) STATE OF ALABAMA.  
CLARENCE F. HASKEW, )  
Defendant. ) BALDWIN COUNTY.  
-----X

TO HONORABLE, WM. S. ANDERSON, SOLICITOR OF RECORD FOR RESPONDENT.

You are hereby notified that the undersigned Register allowed and filed the proposed amendment on the 17th., day of May, 1923, in every particular as proposed by the complainant, a copy of which said amendment was duly served upon you on the 11th., day of May, 1923, together with notices of a motion to amend the said original bill. You are further notified that you are required to appear and plead, answer or demur, to the said amendment within thirty days after the service of this notice upon you, And this you shall in no wise omit under penalty, etc., a copy of the said amendment is hereto attached.

Witness my hand this 21st, day of May, 1923.

T. W. Shelton  
Register.



-----X  
 ANNA HEIDEL HASKEW, )  
           Complainant. )  
                           ) IN THE CIRCUIT COURT<sup>2</sup>EQUITY SIDE.  
                           ) )  
           -vs-              ) STATE OF ALABAMA.  
                           ) )  
 CLARENCE F. HASKEW, )  
           Defendant.   ) BALDWIN COUNTY.  
 -----X

Comes the complainant, Anna Heidel Haskew, in the above styled cause, and by leave of court first had and obtained amends the original bill of complaint in this cause filed as follows:-

FIRST

By adding or inserting, after paragraph designated "FIVE" in original bill, the following paragraph, designated and in words and figures, as follows:-

"SIX. That the said respondent, Clarence Frederick Haskew is an ablebodied and healthy man and is able to and does earn a good living; that the complainant is without independent means of support and owing to the small children who require her constant attention she is unable to earn a living for herself and said children but that the respondent is well able to earn a living for himself and also able to properly support and maintain your oratrix and their said children in a manner suitable to their condition and state in life."

SECOND

By inserting in the prayer, in the fourth line thereof on the first page of said original bill, after the words "required by law" and before the words "and that upon a final hearing, etc.," the following:-

"....; that your Honor will order and direct and decree that a reference be hold by and before the Register of this Court to ascertain the value of the property and the earning capacity of the respondent, Clarence Frederick Haskew, and to ascertain a suitable amount to be paid by the said respondent to your Oratrix as alimony pendente lite, attorneys fees for the prosecution of this cause and permanent alimony and that such findings by the Register on this reference be reported to your Honor in accordance with the rules and practices of this Honorable Court; that your Honor will render, adjudge and decree to the oratrix a suitable amount to be paid hereby the respondent as alimony pendente lite and as attorneys fees in this cause;"

By inserting in the prayer, in the third line thereof on the second page of said original bill, after the words "...and Cleo Haskew" and before the words "...and that such other relief may be granted", the following:-

"....and that your Honor will render adjudge and decree unto your Oratrix a suitable amount to be paid to her by



the respondent, Clarence Frederick Haskew, or out of the estate of the respondent, Clarence Frederick Haskew, as permanent alimony and for the support of your Oratrix and the said children, such amount to be suitable to the condition and state in life of your Oratrix and the said children."

Henry Stone  
Solicitor for Complainant.

*Handwritten notes on the left margin, including the name "James P. ..."*

*Handwritten notes in the middle-left margin.*

RECORDED

*Handwritten notes in the middle margin.*

*Handwritten notes in the middle margin.*

*Handwritten notes in the middle-right margin.*

*Handwritten notes on the right margin.*



-----X	)	
ANNA HEIDEL HASKEW,	)	IN THE CIRCUIT COURT <sup>2</sup> EQUITY SIDE.
Complainant.	)	
	)	STATE OF ALABAMA.
-vs-	)	
	)	BALDWIN COUNTY.
CLARENCE F. HASKEW,	)	
Defendant.	)	
-----X	)	

Comes the complainant, Anna Heidel Haskew, in the above styled cause, and by leave of court first had and obtained amends the original bill of complaint in this cause filed as follows:-

FIRST

By adding or inserting, after paragraph designated "FIVE" in original bill, the following paragraph, designated and in words and figures, as follows:-

"SIX. That the said respondent, Clarence Frederick Haskew is an ablebodied and healthy man and is able to and does earn a good living; that the complainant is without independent means of support and owing to the small children who requize her constant attention she is unable to earn a living for herself and said children but that the respondent is well able to earn a living for himself and also able to properly support and maintain your oratrix and their said children in a manner suitable to their condition and state in life."

SECOND

By inserting in the prayer, in the fourth line thereof on the first page of said original bill, after the words "required by law" and before the words "and that upon a final hearing, etc.," the following:-

"....; that your Honor will order and direct and decree that a reference be held by and before the Register of this Court to ascertain the value of the property and the earning capacity of the respondent, Clarence Frederick Haskew, and to ascertain a suitable amount to be paid by the said respondent to your Oratrix asalimony pendente lite, attorneys fees for the prosecution of this cause and permanent alimony and that such findings by the Register on this reference be reported to your Honor in accordance with the rules and practices of this Honorable Court; that your Honor will render, adjudge and decree to the oratrix a suitable amount to be paid hereby the respondent as alimony pendente lite and as attorneys fees in this cause;"

By inserting in the prayer, in the third line thereof on the second page of said original bill, after the words "...and Cleo Haskew" and before the words "...and that such other relief may be granted", the following:-

".....and that your Honor will render adjudge and decree unto your Oratrix a suitable amount to be paid to her by



the respondent, Clarence Frederick Haskew, or out of the estate of the respondent, Clarence Frederick Haskew, as permanent alimony and for the support of your Oratrix and the said children, such amount to be suitable to the condition and state in life of your Oratrix and the said children."

*Haus Haus*

Solicitor for Complainant.

RECORDED

*Clarence F. Haskew*  
*Respondent*

*1892/4*

*1892/4*

*1892/4*

*1892/4*



ANNA HEIDEL HASKEW

VS

CLARENCE FREDERICK HASKEW

Circuit Court- Equity Side.

Comes the Complainant Anna Heidel Haskew by Stone & Stone her solicitors and moves the Court to order the Register of this Court to set a day and hold a reference to ascertain the amount of Attorneys fees and Alimony Pendente Lite prayed for in the amended complaint in this cause.

*Stone & Stone*  
Stone & Stone

Solicitors for Complainant.

*I accept notice of the above notice  
This 3<sup>rd</sup> day of July 1924*

*W. S. Anderson  
Solr for Deft.*



The State of Alabama,  
Baldwin County.

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

*Anna Huel Hasbaw* Complainant.

VS.

*Clarence Fredrick Hasbaw* Respondent.

*J W Richerson*

I

as Register and Commissioner

have called and caused to come before me

*Anna Huel Hasbaw*

witness named in the Requirement for Oral Examination, on the

*11* day of *January*

192*7*, at the office of

*J W Richerson, Register*

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

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

*witness*

doth depose and say as follows:

.....



ANNA HEIDEL HASKEW, the complainant and a witness for complainant, upon being duly sworn, testifies as follows:-

My name is Anna Heidel Haskew and I am the complainant in the above cause now pending in the Circuit Court-Equity Side Baldwin County, Alabama, and wherein my husband, Clarence Fredrick Haskew is the defendant. Both I and my husband, the said defendant, were at the time of the filing of the Bill of Complaint, over the age of 21 years and were bona fide residents of Baldwin County, Alabama, where we both had resided for something like six years <sup>continuously</sup> prior to the filing of the Bill of Complaint. I and the said Clarence Fredrick Haskew were married in January, 1917 in Abeline, Texas and we lived together as man and wife until sometime during the latter part of 1922 when on account of the matters hereinafter complained of, I was compelled to separate from him. That for several months prior to our separation the said Clarence Fredrick Haskew on numerous occasions treated me in a cruel and inhuman manner. He would choke me, beat and abuse me, he struck me with his fist and would slap me. During the month of May, 1922 he choked and beat me until I was almost unconscious. In December 1922 he beat me with his fist and bruised me badly and I was confined to my bed with fever. This is the assault that he was prosecuted for and convicted of in the Circuit Court of Baldwin County, Alabama.

There were born to us by said marriage the following children: Velma Haskew, Norman Haskew and Cleo Haskew all of whom reside with me at the time of the institution of this cause and who still reside with me, I having taken care of, maintained, supported and educated them entirely and without any help from Mr. Haskew since our separation.

The said Clarence Fredrick Haskew by reason of his cruel and ungovernable disposition, is not a fit and proper person in any respect to have the custody, care or control of said children. I think I am a fit and proper person to have their custody and control. Even before we separated my husband treated our children in a brutal manner at times.

Mrs. Anna Heidel Haskew



ORAL EXAMINATION.

I, J. W. Richerson, 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 and read over to her and she signed the same in the presence of myself and Norman Stone

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 11 day of January 1927

(L. S.)

NO. PAGE

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Shoemaker

vs.

Complainant

Shoemaker

Respondent.

Oral Deposition

Filed 1-11-, 1927

Recorded in \_\_\_\_\_, Register.

Recorded in

Record \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_

\_\_\_\_\_, Register



Anna Heidel Haskew,  
Complainant.

-vs-

Clarence Frederick Haskew,  
Respondent.

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

NOTE OF TESTIMONY.

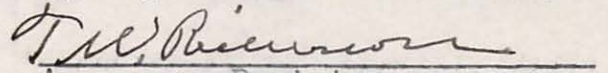
This cause is submitted on behalf of the complainant on

1. Original Bill of Complaint as filed on February 2nd, 1923.
2. Testimony of Complainant, Anna Heidel Haskew, a witness for complaint, as taken orally before the Register.
3. Certified copy of the Judgment entry and sentence in the case of the State vs. Clarence Frederick Haskew, Assault and Battery, Circuit Court, Baldwin County, Alabama.

This cause is submitted on behalf of the respondent on

- (a) Answer to the Original Bill of Complaint.
- (b) Answer to the Amended Bill of Complaint.

I hereby certify that the foregoing is true and correct.

  
Register.



Anna Heidel Haskew, )  
Complainant, )  
vs. )  
Clarence F. Haskew, )  
Defendant. )

In CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.

In Equity.

Now comes the defendant in the above stated cause and for answer to the amendment to Complainants Bill, numbered Six, Says:

He denies the allegations in said amendment, that he does earn a good living, on the contrary he says, he earns barely enough to pay for his board and clothing, and that he is in debt for money that he owes. Further answering said paragraph, Respondent says that Complainant has taken possession of the place he rented, that she has possession not only of the premises, but has possession of every thing he owns, including his household goods and his wearing apparel; that she refuses to let him have his wearing apparel, and has driven him from his home and his children. All that Respondent owns is now and has been in her possession for the past five or six months. Respondent says he is not able to earn a living for complainant and said children, while she retains possession of his property.

Respondent says it is true so far as he knows that Complainant has no independent means, and is unable to earn a living for herself and said children, but Respondent says she has herself to blame for the unhappy conditions, which she herself has brought about.

Further answering said amended paragraph, Respondent says that last Summer Complainant left him taking with her the children and spent some time at Bay Minette, during which time he paid out for her and the children, something like Eighty five Dollars; that he is informed that she tried to get a divorce from him, but she could find no legal ground for such divorce, as he had done nothing to entitle her to a divorce; that some time last Fall she returned to respondents home with the children and lived with him, until she made up a fictitious charge of assault and battery against him, for which she has had him convicted, but most unjustly, as the whole story of such assault is a fabrication, without the least foundation in fact, and rests on her unsupported statements. Respondent has been fined the sum of \$250.00 and the costs amounting to \$84.34. That he has confessed judgment for such fine and costs, which he will have to pay. This will take more than he



will be able to earn during the time within which it must be paid.

That he has no independent means of his own.

Clarence F. Haskew

State of Alabama )

Baldwin County. ) Before me T. W. Richerson, Clerk of the Circuit Court  
of Baldwin County, Alabama, personally appeared Clarence F. Haskew, who  
is known to me, and who is the defendant in the above stated case, who  
after being by me first duly sworn deposes and says, that the facts  
stated in the foregoing answer of his own knowledge are true, and those  
stated on the information of others he believes to be true.

Subscribed and sworn to before me )  
this 20<sup>th</sup> day of June 1923. )

T. W. Richerson  
Clerk Circuit Court,

Clarence F. Haskew

RECORDED



----- X  
ANNA HEIDEL HASKEW,  
Complainant.

-vs-

CLARENCE FREDERICK HASKEW,  
Defendant.  
----- X

IN THE CIRCUIT COURT-EQUITY SIDE,  
STATE OF ALABAMA.  
BALDWIN COUNTY.

This cause coming on to be heard upon motion of the complainant for an order of reference to ascertain the amount of attorneys fees and alimony pendente lite as prayed for in the amended complaint in this cause and it appearing to the Court that said motion was filed July 3rd., 1924, and that notice thereof was accepted by the Solicitors for defendant on said date and it further appearing to the Court that said motion should be granted;

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that the Register be and he is hereby ordered and directed to hold a reference in this cause to ascertain the value of the property and the earning capacity of the defendant, Clarence Frederick Haskew and to ascertain a suitable amount to be paid by the said defendant to your complainant as alimony pendente lite and attorneys fees for the prosecution of this cause and that the findings on the reference be duly reported in accordance with the rules and practice of this Court.

Done this 16<sup>th</sup> day of August, 1924.

*John D. Lusk*  
Register.  
Judge.



-----X  
ANNA HEIDEL HASKEW, )  
Complainant. )  
-vs- )  
CLARENCE F. HASKEW, )  
Defendant. )  
-----X

IN THE CIRCUIT COURT-EQUITY SIDE.  
STATE OF ALABAMA.  
BALDWIN COUNTY.

TO THE HONORABLE, T. W. RICHEYSON, REGISTER IN CHANCERY, CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY.

Comes the complainant, Anna Heidel HaskeW, by Stone & Stone, her Solicitors of Record in the above styled cause, and prays leave of this court to amend the original bill of complaint in this cause filed by her <sup>1st #</sup> by adding or inserting, after paragraph designated "FIVE" in original bill, the following paragraph, designated and in words and figures, as follows:-

"SIX. That the said respondent, Clarence Frederick HaskeW is an able-bodied and healthy man and is able to and does earn a good living; that the complainant is without independent means of support and owing to the small children who require her constant attention she is unable to earn a living for herself and said children but that the respondent is well able to earn a living for himself and also able to properly support and maintain your oratrix and their said children in a manner suitable to their condition and state in life."

<sup>2 #</sup> and also by inserting in the prayer, in the fourth line thereof on the first page of said original bill, after the words "required by law" and before the words "and that upon a final hearing, etc.", the following:-

"....; that your Honor will order and direct and decree that a reference be held by and before the Register of this Court to ascertain the value of the property and the earning capacity of the respondent, Clarence Frederick HaskeW, and to ascertain a suitable amount to be paid by the said respondent to your Oratrix as alimony pendente lite, attorneys fees for the prosecution of this cause and permanent alimony and that such findings by the Register on this reference be reported to your Honor in accordance with the rules and practices of this Honorable Court; that your Honor will render, adjudge and decree to the oratrix a suitable amount to be paid herby the respondent as alimony pendente lite and as attorneys fees in this cause;"

<sup>3 #</sup> and also by inserting in the prayer, in the third line thereof on the second page of said original bill, after the words "...and Cleo HaskeW" and before the words "...and that such other relief may be granted", the following:-

".....and that your Honor will render adjudge and decree unto your Oratrix a suitable amount to be paid to her by the respondent, Clarence Frederick HaskeW, or out of the estate of the respondent, Clarence Frederick HaskeW, as permanent alimony and for



the support of your Oratrix and the said children, such amount to be suitable to the condition and state in life of your Oratrix and the said children."

ORATRIX prays that a day be set for the hearing of this application to amend, that a copy of the proposed amendments together with notice of the hearing of this application be given to the opposite party, the said respondent, Clarence Frederick Haskew or Hon. Wm. S. Anderson, his Solicitor of Record.

*Stanley Stan*  
Solicitors for Oratrix.

*[Faint handwritten notes and signatures in the lower right quadrant of the page.]*



ANANA HEIDEL HASKEW,  
Complainant.

-vs-

CLARENCE FREDERICK HASKEW,  
Defendant.

CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

NOTICE OF APPLICATION TO AMEND ORIGINAL BILL AFTER ANSWER  
TO THE HON. WM. S. ANDERSON, SOLICITOR OF RECORD FOR RESPONDENT.

You are hereby notified that the Complainant, Anna Heidel Haskew, by her Solicitors of Records, Stone & Stone, have filed with me as Register of this Court and in the above styled cause, an application to amend the original bill in this cause filed by complainant and to which original bill answer has already been made by you, a copy of such application setting out the proposed amendments being attached to this notice. You are further notified that such application will be heard by and before me at the office of the Register in Chancery in Bay Minette, Alabama, on the 15 day of May, 1923 at 10 o'clock, A. M.

T. W. Reiman  
Register.



Anna Heidel Haskew, )  
Complainant, ) CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.  
vs. ) In Equity.  
Clarence F. Haskew, )  
Defendent. )

The Answer of Clarence F. Haskew to the Bill of Complaint filed against him in the above stated cause.

1.

Respondent admits the allegations contained in the First paragraph of the Bill.

2.

Respondent admits the allegations contained in the Second paragraph of the Bill

3.

Respondent expressly denies each allegation in the Third paragraph of the Bill, and says they are untrue.

4.

Respondent says the allegations in the Fourth Paragraph of the Bill are absolutely untrue.

5.

Respondent admits the allegations in the Fifth Paragraph of the Bill as to the names and ages of the children.

6.

Further answering the Bill of Complaint Respondent says that Complainant is not a fit or proper person to have the care and custody of the children, such care and custody should be given to Respondent.

*R. S. Anderson*  
*Solicitor for Respondent*