

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 Frank P Redmond,

of Brinkley Arkansas, ~~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

Katie Redmond,

against said Frank P Redmond,

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 28th. day of February, 1923.

T. W. Richerson
Register.

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

Original

Serve on -----

Circuit Court of Baldwin County
In Equity

No. -----

SUMMONS

Katie Redmond.

vs.

Frank P Redmond.

Page and Moorer.

Solicitor for Complainant

Recorded in Vol. ----- Page -----

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this -----

day of ----- 192-----

Sheriff

Executed this ----- day of

----- 192-----

by leaving a copy of the within summons with

Defendant

Sheriff

By -----

Deputy Sheriff

*Copy of Summons
and Copy of
Complaint sent by
Registered Mail
to Frank P Redmond
Brimley, Arkansas.*

*J. McInnis
Register*

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

J.P. Brown

(Signature or name of addressee.)

J.P. Brown

(Signature of addressee's agent.)

Filed
Mar 10/923
J.P. Brown
Date of delivery, -----, 19 .

Form 3811

C 5-8116

Post Office Department

OFFICIAL BUSINESS

REGISTERED ARTICLE

No. 1022

INSURED PARCEL

No. _____

Return to

J. W. Richerson

(NAME OF SENDER)

Street and Number,
or Post Office Box,

Post Office at

BAY MINETTE, ALA.

State

PENALTY FOR PRIVATE USE
TO AVOID PAYMENT OF
POSTAGE, \$300.

POSTMARK OF DELIVERING OFFICE
MAR 8
1230PM
ARK.
1923
AND DATE OF DELIVERY



Katie Redmond

.....
.....
.....

vs.

Frank P Redmond,

.....
.....
.....

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,
decree pro confesso and testimony, of Katie Redmond and W.R. Stuart,
also copy of Judgment entry in County Court.

and in behalf of Defendant upon.....

.....
.....
.....

J. W. Peterson

Register

No.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Katie Redmond

vs.

Frank P Redmond.

NOTE OF TESTIMONY.

Filed in Open Court this 27th,

day of April 1923.

J. W. Peterson
Register

IN THE CIRCUIT COURT, Baldwin COUNTY, IN EQUITY.

Katie Redmond, Complainant.

vs.

Frank P Redmond, Respondent.

I, T.W.Richerson,

as Register,

have called and caused to come before me Katie Redmond, and ~~Frank P. Redmond~~

W.R.Stuart,

witnesses named in the Requirement for Oral Examination, on the 27 day of April

1923 at the office of Bay Minette Alabama Register of Circuit Court

in Bay Minette Alabama, Alabama, and having first sworn said witnesses to speak the truth, the whole truth, and nothing but the truth, the said

doth depose and say as follows:

Testimony of Katie Redmond:

My name is Katie Redmond, I am a resident citizen of Baldwin County, Alabama, residing at Rabon in said County and am over the age of twenty-one years. Frank P. Redmond is a resident of Baldwin County, Alabama, residing at or near Rabon in Baldwin County, Alabama, but he is temporarily out of the State of Alabama. He is over the age of twenty-one years.

Frank P. Redmond and myself were lawfully married and lived together as man and wife until or or about Novmber 16th, 1922, at which time the said Frank P. Redmond beat me so as to endanger my health and life, and that from the said acts of the said Frank P. Redmond I had reasonable a prehension that my life and health was endangered.

I am the mother of one child, Frank P. Redmond, Jr. which is only about 13 months old. I am now the mother of an unborn child and both of the children are the children of Frank P. Redmond. Frank P. Redmond beat me and left me at the mercy of the world taking all of our property, a portion of which is owned absolutely by me and kept me from having the use of any of it. I have no income at all not has Frank P. Redmond provided for me or our infant child, nor has he given me any money or attention or assisted in caring for me since I became pregnant. He has gone from Baldwin County, Alabama. He left Baldwin County according to my information and beleif so that process of this court could not be had upon him; that he left the State of Alabama for the purpose of secreting and concealing himself so that service could not be had upon him. He has not at any time given me his address so that I might communicate with him or plead with him for support of myself and infant child and my unborn child. The separation took place at or near Rabon in Baldwin County, Alabama. He beat me in Baldwin County, Alabama.

Frank P. Redmond is an able bodied man earning more than a good living and is capable of supporting his wife and children. Frank P. Redmond makes from \$150.00 to \$200.00 per month. I know the handwriting of Frank P. Redmond when I see it. I saw a letter the other day from him to my sister saying that he was making \$200. per month now.

In my present condition I am unable to work and am compelled to stay with my infant child. As I am now ~~pregnant~~ pregnant I am not able to work and am greatly in need of support for myself and child and am in need of the necessities to care for my unborn child. I am compelled to have the service of a Doctor and to have the necessary articles to care for myself and child and unborn child. I am without money to pay my board. It cost about \$60.00 per month to care for myself and child and as I am now in such a condition as to need more medical service it will naturally cost a great deal more. For the next two years it would reasonable cost \$75.00 per month to care for myself and children. Seventy-five Dollars per month is very reasonable sum considering out station and condition in life. My unborn child will be born in July, 1923.

Frank P. Redmond owns real estate in Baldwin County Alabama, valued at approximately \$1500.00.

Katie Redmond.

Testimony of W. R. Stuart, Sheriff of Baldwin County, Alabama:

My name is W. R. Stuart. I am sheriff of Baldwin County, Alabama. I know Mrs. Katie Redmond and Frank P. Redmond. They are husband and wife. They live near Rabon in Baldwin County, Alabama, that is their household good were out there. About last fall Mrs. Redmond swore out warrant for Frank P. Redmond and same was placed in my hands to serve. I arrested him for beating his wife. He came in and said he was guilty. I have a certified copy of the judgment entry in the case of ~~Red~~ State of Alabama vs Frank P. Redmond in the County Court, Baldwin County, Alabama. I attach the copy hereto as a part of my testimony.

W. R. Stuart

JUDGMENT ENTRY.

THE STATE

No. 38.

Vs.

COUNTY COURT.

Frank Redmond, Jr.,

December Term, 1922

Dec 11th, 1922

Defendant pleads not guilty. On hearing the evidence in

this case the Court is satisfied of the guilt of the Defendant of Assault and Battery,

and hereby awards the following punishment; A fine of \$10.00

and the costs of this proceeding, paid,

The Defendant having failed to pay said Fine and Costs or to secure the same, it is hereby ordered by the Court that he be and hereby is sentenced to perform hard labor for the State of Alabama for the use of Baldwin County for a period of

days to pay said fine, and an additional period of

days to pay the costs of this proceeding.

J.M.Voltz

Judge of County Court.

The Defendant prays an appeal from the Judgment of this Court to the next ensuing Term of the Circuit Court, which is hereby granted, and his Bond fixed at \$....., and Defendant demands trial by a jury, sentence is hereby suspended pending appeal.

Judge of County Court.

CERTIFICATE TO TRANSCRIPT.

THE STATE OF ALABAMA, Baldwin County.

T.W.Richerson, Clerk Circuit Court, I, James M. Voltz, Judge of the County Court of Baldwin County, Alabama,

Judgment Entry

hereby certify, that the above and foregoing is a true and correct copy of all the proceedings had in said County Court in the case of State of Alabama vs. Frank P. Redmond, Jr.,

Witness my hand this 27th, day April 1923

T.W. Richerson, Clerk of the Circuit Court and Ex-Officio Clerk of the County Court.

ORAL EXAMINATION.

I, T.W. Richerson, as Register

hereby certify that the foregoing deposition.....on Oral Examination.....was taken down in writing by me in the words of the witnesses and read over tothem and they signed the same in the presence of.....myself,

at the time and place herein mentioned; that I have personal knowledge of the 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 in 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 27th day of April, 1923.

T.W. Richerson (L.S.)

No. Page.....

The State of Alabama

Baldwin Gandy

IN CIRCUIT COURT, IN EQUITY.

Katie Redmond,

vs. Complainant.

Frank Redmond,

Respondent.

ORAL DEPOSITION.

Filed April 27th, 1923

T.W. Richerson, Register.

Recorded in

Record

Vol.

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Register.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.
In Equity.

TO THE HONORABLE, JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA.---In Equity.

Your Oratrix, Katie Redmond, respectfully represents and shows unto Your Honor as follows:

1. That she is a bona fide resident citizen of Baldwin County, Alabama, residing at Rabon in said County, and that she is over the age of twenty-one years.

That Frank P. Redmond is a resident of Baldwin County, Alabama, residing at or near Rabon in said County, and that he is over the age of twenty-one years of age.

2. That Your Oratrix and the said Frank P. Redmond were lawfully married and lived together as man and wife until on or about November 16th, 1922, at which time the said Frank P. Redmond beat your Oratrix so as to endanger her life and health and that from the acts of the said Frank P. Redmond Oratrix had reasonable apprehension that her life and health was endangered.

3. That Your Oratrix is the mother of one child, Frank P. Redmond, Jr., and that she is now the mother of another unborn child and both children are the children of the said Frank P. Redmond. That since the said Frank P. Redmond beat your Oratrix he has left her at the mercy of the world taking all of their property a portion of which is owned by Oratrix and simply because she is without means of proceeding in the courts has kept Oratrix from having the benefit of her said property; that Oratrix has absolutely no income at all nor has she or her minor child been provided with any support from her husband, the said Frank P. Redmond since he beat Oratrix; that he has gone from Baldwin County according to Oratrix information and upon said information and belief alleges that the said Frank P. Redmond has gone out of the State and keeps his address and residence from Oratrix so that process of this court cannot be had; that defendant present address is Brinkley, Arkansas;

that the said Frank P. Redmond left the State of Alabama for the purpose of secreting ^{and concealing} /himself so that service could not be had and at no time has he give his address to any one from whom same could be had by your Oratrix so that she could plead with him for support of herself and minor child.

4. That the said Frank P. Redmond is an able bodied man earning much more than a good living and is capable of supporting his wife and minor child; that the said Frank P. Redmond earns about \$150.00 per month and owns considerable real estate in Baldwin County, Alabama.

PRAYER FOR PROCESS.

The Premises considered, your Oratrix respectfully prays that the said Frank P. Redmond be made party respondent to this original bill of complaint by the usual process of this court; that such orders, decrees and publications be had as necessary to perfect service on the said Frank P. Redmond, and that he be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your Honor will grant unto Oratrix an absolute divorce from the said Frank P. Redmond.

That Your Honor will order a reference to determine a suitable and reasonable amount as alimony pendente lite and a reasonable attorneys fee for carrying on this litigation and the amount of permanant alimony and support for their minor children; that upon the final hearing of this cause your Honor will cause all necessary orders and decrees to be issued to compell the said Frank P. Redmond to pay the alimony allotted by this court.

That if your Oratrix is mistaken in the relief prayed then Your Honor will grant unto her such other, further, different and general relief as she may in equity and justice be entitled, she will ever, pray etc.

FOOT NOTE:

The Respondent, Frank P. Redmond is required to answer each and every paragraph of the foregoing bill of complaint from 1 to 4, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORER,
Solicitors for Respondent.

1 Katie Redmond
2 Complainant

In the Circuit
Court of Baldwin
County, Alabama

3 vs
4 Frank P Redmond
5 Respondent

In Equity
No 379

6
7 This cause coming on to be heard
8 this the 7th day of January 1924
9 was submitted for final decree
10 upon the original bill of complaint,
11 the decree pro confesso against the
12 defendant, request for decree in
13 vacation, copy of judgment entry
14 in the County Court of Baldwin
15 County, Alabama, and testimony
16 of Katie Redmond and W. R.
17 Smart, as noted by the Clerk and
18 Register.

19 And upon consideration
20 thereof the Court is of the opinion
21 the Complainant is entitled to the
22 relief prayed for in her said bill
23 of Complaint.

24 It is therefore ordered, adjudged
25 and decreed by the Court that the
26 bonds of matrimony heretofore
27 subsisting between the Complainant
28 and respondent be, and the same are
29 hereby, dissolved and annulled and
30 that the said Katie Redmond be
31 and she hereby is forever divorced
32 from the said Frank P. Redmond

1 for an on account of the cruelty
2 on the part of the said Frank P.
3 Redmond toward the said Katie
4 Redmond, the said Frank P. Redmond
5 having beaten the said Katie Redmond
6 to such an extent as to endanger her
7 life and health.

8 It is therefore ordered, adjudged
9 and decreed by the Court that the
10 said Frank P. Redmond pay the
11 cost of this suit, to be taxed by the
12 Clerk and Registered, for which let
13 execution issue.

14 It is further ordered, adjudged
15 and decreed by the Court that said
16 Katie Redmond shall not again
17 marry, except to said Frank P. Redmond,
18 until after sixty (60) days after this
19 date, and that if an appeal is
20 taken within sixty (60) days she shall
21 not marry again except to said
22 Frank P. Redmond during the pendency
23 of said appeal.

24 It appearing to the Court by
25 allegations contained in the bill of
26 complaint that there was born
27 unto complainant a boy child who
28 was named Frank P. Redmond, Jr.
29 and that complainant was pregnant
30 at the time of the filing of the bill of
31 complaint and that said boy child
32 Frank P. Redmond, Jr., and the preg-

with the Complaint
has made pro
facts to the satisfaction
and the Complainant has
proved to the ^{satisfaction of the} Court that since
the filing of the bill of Complaint
in this cause the complainant has
given birth to a _____ child, who
has been named _____.

It is therefore ordered, adjudged
and decreed that the said Complainant
Katie Redmond shall have the
Custody and Control of the said
Frank S. Redmond, Jr. and _____ Redmond,
the lawful children of the said Katie
Redmond and Frank P. Redmond,
free from all interference on the
part of the said Frank P. Redmond.

The Complainant in this
Cause having prayed in her ^{bill of} Complaint
that she be granted alimony for
the support of herself and the children
and has taken the testimony of
witnesses and proven and established
to the satisfaction of the Court that
she has no separate estate of her own
and is without sufficient means
for the maintenance of herself and
children and has further proven

1 and established to the satisfaction
2 of the Court, by the evidence
3 taken in this cause, that the
4 Respondent Frank P. Redmond
5 is an able bodied man, able to work
6 and is employed and receiving a
7 salary ranging between one hundred
8 and fifty and two hundred dollars
9 per month, that he has real
10 estate in Baldwin County, Alabama
11 worth, approximately, fifteen hundred
12 dollars.

13 It is therefore ordered, adjudged
14 and decreed that the said Frank P.
15 Redmond pay to the Clerk and
16 Register of this Court the sum of
17 seventy-five dollars per month, beginning
18 with the first payment on February 1st
19 1924 and a like payment on the
20 first day of each month thereafter
21 for the use and benefit of the said
22 Katie Redmond, the wife of Frank P.
23 Redmond and being her allowance
24 out of the estate of her husband.
25 That the said Clerk and Register, ^{of the Court} will
26 give a receipt to the said Frank P.
27 Redmond for each of said payments,
28 paying all of said sums, so received
29 by him, to the said Katie Redmond
30 and taking her receipt therefor.

31 It is further ordered, adjudged
32 and decreed by the Court that all

1 other matters and questions are hereby
2 reserved by the Court for such orders
3 and decrees as may hereafter deemed
4 advisable.

5 Done at Brewton Alabama, at
6 Chambers, on this the 7th day of
7 January 1924.

8 John D. Leigh
9 Judge of 21st Judicial
10 Circuit of Alabama
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Katie Redmond

vs.

Frank P Redmond

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

I, *J. W. Richardson*, Register of said Court, do hereby certify that I

did, on the *28th* day of *February* 192*3*, send to

Frank P Redmond Defendant.

whose address was *Brussels Arkansas*

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

together, with a summons to answer such complaint within thirty days from the service thereof

receipt was duly received and filed by me in this cause, on the *10* day of *Mar* 192*3*.

Witness my hand, this *11* day of *Mar* 192*3*

J. W. Richardson

Register.

3

No.....

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

Katie Redmond

vs.

RECORDED

Frank J Redmond

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this.....

day of 192.....

Register.

The State of Alabama, }
BALDWIN COUNTY. }

No. 379 CIRCUIT COURT IN EQUITY.

Katie Redmond. Complainant...

vs.

Frank P Redmond. Defendant...

Motion is hereby made for a Decree Pro Confesso against

Frank P Redmond, Defendant...

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant..... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23rd, day of April 1923.

Ray M. Moore
Solicitor.

RECEIPT FOR REGISTERED ARTICLE NO.

1022 *2/25*, 19*23*

1 class postage paid.

From *J.W. Richardson*

Addressed to *Frank P. Redmond*

Return receipt desired

Delivery restricted { To addressee in person



Katie Redmond.

vs.

Frank P Redmond.

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

In this cause it being made to appear to the Register that on the 28th day of February, 19 23, a copy of the Bill of Complaint filed in this cause was sent to Frank P Redmond,

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," and return receipt demanded addressed to the Register of this Court; and that on the 10th day of March, 19 23, such receipt was duly received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered, adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things taken as confessed against the said Frank P Redmond,

Defendant.

This the 23rd, day of April 19 23

J. W. Robinson

Register.

No. 379.

CIRCUIT COURT OF

Baldwin COUNTY,

IN EQUITY.

Katie Redmond.

vs.

Frank F. Redmond.

DECREE PRO CONFESSO AFTER
NOTICE BY REGISTERED MAIL.

Filed in office this 23rd day of

April 19 23

J. W. Peterson
Register.

Entered in O. B. Page

RECORDED