Mancy Ellen Jimerson Niemeyer ) IN THE CIRCUIT COURT Complainant OF BALDWIN COUNTY ALABAMA IN EQUITY John Harold Niemeyer

Respondent

ANSWER TO BILL OF COMPLAINT.

Comes the Respondent, John Harold Niemeyer, in the above styled cause and makes answer severally and separately to each and every count of the complaint:

- t) I admit the allegations in Count 1.
- I admit the allegations in Count 2.
- 3) I deny the allegations in Count 3.

I agree that testamony in this cause may be taken by deposition on oral testamony and consent to the naming of Carl L. Bloxham, Fairhope, Alabama as commissioner to take such oral testamony, notice of time and place of taking same is hereby waived by me. I agree that the testamony in this cause when so taken may be submitted for final decree without notice to me and I hereby waive any and all notices to which I may be entitled in this cause.

I hereby new into the Court the sum of Fifty-Dollars (\$50.00) for the purpose of paying Court costs and reasonable attorney fees for Complainan

State of Alabama County of Baldwin

Before me, Layle Wilder \_ , a Notary Public in and for Baldwin County Alabama, personally appeared John Harold Micmeyer, subscribing respondent named above, snad being duly sworn says that the contents of this Answer are true or his own knowledge and belief and that his name was subscribed before me.

My commission expires October 4, 1940.

ayle Wilder

## The State of Alabama, Baldwin County

### CIRCUIT COURT, IN EQUITY

Nancy Ellen Ji	merson Niemeyer	Complainant
·	VS.	
John Harold Ni	emeyer	Respondent
This cause coming on to be	heard was submitted upor	n Bill of Complaint, Decree Pro Confesso
		mony as noted by the Register, and upon omplainant is entitled to the relief prayed
It is therefore ordered, adju tofore existing between the Comp	dged and decreed by the oblainant and Defendant be	Court that the bonds of matrimony here, and the same are hereby, dissolved, and
that the said Nancy Ellen J	imerson Niemeyer	
is forever divorced from the said	<u>. 14.1 18</u> 4 -	
John Harold N	<u>lemever</u>	
for and on account of	able apprehension	of violence attendant
with Janger to life l	imb and bealth.	
It is further orde	red, adjudged and	decreed that Complainant
be permitted to resum	e her maiden name	of Nancy Ellen Jimerson
and that the title to Tarital domicile by C	era kartikati kita kerangan kerangan kalangan Makanakan kanangan bandan Palanti banasan kerangan kanan bandari	perty removed from the
MERICEL COMICILE DV C	ompravnant be dec	TELOU MEEGO THERIOL.
except to each other until sixty da	ays after the rendition of nall again marry except to	ner party to this suit shall again marry this decree, and that if appeal is taken be each other during the pendency of said apondent
be, and they hereby permit this suit.	ted to again contract mar	riage upon the payment of the cost of
It is further ordered that	John Harold Wie	meyer
the Respondent pay t	the cost herein to be taxed	d, for which execution may issue.
This 25th day of	May	, 19 40
	( <u>                                     </u>	F. W. HARE,
		Judge Circuit Court, in Equity.
ere engel er i Diele		
I, Aires. Dock	Court for Baldwin Coun foregoing is a correct cor	, Register of the Circuit ty, Alabama, do hereby certify that the by of the original decree rendered by the urt in the above stated cause, which said olled in my office.
	Witness my hand	and seal this theday
	of	, 19
	· .	Register of Circuit Court, in Equity.

## The State of Alabama, Baldwin County

#### CIRCUIT COURT, IN EQUITY

		Complainant
	vs.	
<u> John Harold Ni</u>	iemeyer	Respondent
This cause coming on to be	e heard was submitted upon Bill o	of Complaint, Decree Pro Confess
n <u>Depositions</u> onsideration thereof, the Court : or in said bill.	and Testimony and the Complai	as noted by the Register, and upor nant is entitled to the relief prayer
It is therefore ordered, adjofore existing between the Com	udged and decreed by the Court of a plainant and Defendant be, and t	that the bonds of matrimony here the same are hereby, dissolved, an
hat the said <u>Nancy Ellen</u> :	Jimerson Niemeyer	· .
s forever divorced from the said		
John Harold Niem	eyer	
or and on account of reason:	able apprenension of v	iolence attendant
with danger to life a	nd limb and health.	## ## #
It is further or	dered. ad ludged, and do	ecreed that Complainant
	e her ma <b>i</b> den name <b>o</b> f Na	
	the personal property	
	lomplainant be declared directed to pay arer to a Respondent arer and	
vithin sixty days, neither party s appeal.	shall again marry except to each	ecree, and that if appeal is taken other during the pendency of said
	itted to again contract marriage 1	
nis suit.	John Harold Niemeyer	
It is further ordered that		
	the cost herein to be taxed, for w	which execution may issue.
This day of	May	, 1940
	/	
	-17	MHare
	<del></del>	Judge Circuit Court, in Equity.
I,	foregoing is a correct copy of the	, Register of the Circuit abama, do hereby certify that the original decree rendered by the he above stated cause, which said
I,	foregoing is a correct copy of the Judge of the Circuit Court in the decree is on file and enrolled in	Register of the Circuit abama, do hereby certify that the ne original decree rendered by the he above stated cause, which said my office.
I,	foregoing is a correct copy of the Judge of the Circuit Court in the decree is on file and enrolled in	Register of the Circuit abama, do hereby certify that the ne original decree rendered by the he above stated cause, which said my office.
I,	foregoing is a correct copy of the Judge of the Circuit Court in the decree is on file and enrolled in Witness my hand and sear	Register of the Circuit abama, do hereby certify that the ne original decree rendered by the he above stated cause, which said my office.
	Court for Baldwin County, Ala foregoing is a correct copy of th Judge of the Circuit Court in t decree is on file and enrolled in Witness my hand and sea	Register of the Circuit abama, do hereby certify that the ne original decree rendered by the he above stated cause, which said my office.  It this the
I,	Court for Baldwin County, Ala foregoing is a correct copy of th Judge of the Circuit Court in t decree is on file and enrolled in Witness my hand and sea	Register of the Circuit abama, do hereby certify that the ne original decree rendered by the he above stated cause, which said my office.

## The State of Alabama, BALDWIN COUNTY

## CIRCUIT COURT. (Equity)

Term, 194

No. (624) vs.

BILL OF COSTS

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NARCY BILLEN JIMMESON NIEMEYER COMPLAINANT

## VB#

JOHN HAROLD NIESETER RESPONDENT IN THE CIRCUIT COURT

OF BALDWIN COUNTY

ALABAMA

IN EQUITY.

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

Tour Gratrix, Namey Ellen Jimerson Nieweyer, shows unto your Honor that she is a resident of the County of Baldwin, State of Alabama, and is an infant over the age of nineteen years; that John Harold Niemeyer, the respondent, is a resident of Baldwin County, State of Alabama, is over the age of twenty-one years, and thereupon your Gratrix complains and shows unto the Court and your Honor as follows:

- 1. Your Oratrix shows unto your Honor that Gratrix has been a bona fide resident of this State for one year next preceding the filing of this bill.
- 2. That Oratrix and Respondent Inter-married on or about the 30th day of March 1939 in the City of Pensacola, State of Florida, and ever since have been and now are, husband and wife.
- 3. That on diverse occasions between the date of March 30th, 1939 and the dat o of filling this bill. Respondent has conducted himself toward Cratrix in such a manner as to cause her to be apprehensive of violence attended with danger to life, limb or health of said Cratrix; and that Respondent has been guilty of extreme and repeated cruelty to Cratrix PRAMER FOR PROCESS

Your Gratrix also prays your Honor to grant to her all appropriate and legal process and that the same be directed to the said John Harold Niemeyer, Respondent, commanding him to personally appear before the Honorable Court within the time required by law, and to them and there answer fully and completely the several paragraphs of this Bill of Complaint, and that he be required to abide and obey all orders and decrees of this Court, which to your Honor may seem meet and proper.

#### PRAYER FOR RELIEF

Your Oratrix prays that the bonds of matrimony between herself and the Respondent be dissolved.

and set apart to Complainant as shall be equitable and just, and that the Respondent be enjoined and restrained from disposing of or in any manner incombering his equity in the house in Fairhope Alabama which Respondent purchased from Thee Bank of Pairhope and in which we formerly resided.

Your Orabrix further prays that the Respondent may be required to pay a ressenable sum in the Court to defray the expenses of this action and for ocursel fees.

And that your Oratrix may be permitted to resume her maiden name of Namoy Elien Jimerson.

And that sixty days after the awarding of a Final Decree dissolving the bonds of matrix ony that Oratrix may be permitted to remarry.

Your Cratrix further prays for such other, further and general relief as she may be entitled to in equity and good Conscience.

Aney Eller Joseph Minnya Richard Demere

STATE OF ALABAMA
COUNTY OF BALDWIN

TO ANY GLERIFF IN THE STATE OF ALABAMA:

You are hereby commanded to summon John Harold Miemeyer who resides at Fairhope Alabama and employed by Gasten Motor Company. Fairhope, Alabama to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, to be held for said County at the place of holding the same, then and there to enswer the Bill of Complaint of Namoy Ellen Jimerson Niemeyer.

Witness my hand this 10 th day of May 1940.

R.S.Dock

STATE OF ALABAMA )

Dancy Ellen Jimerson Niemeyer, being duly sworm, says
that she is the Complainant whose name is subscribed to the
foregoing Bill of Complaint; that she has heard the above
Bill of Complaint read, and knows the contents thereof; that
the said Bill of Complaint is true of her own knowledge; except
as to the matters and things therein stated to be upon information
and belief, and as to those matters and things she believes it
to be true.

Navey Ellen Jisserson Niemeyer

Subscribed and sworm to by the said Haney Ellen Simerson Micheyer before me, this  $\mathcal{L}^{\underline{\mathcal{U}}}$  day of May, A. D. 1940.

Layle Wilder Celle My comm enp let 8, 1940

## THE STATE OF ALABAMA, Baldwin County

### CIRCUIT COURT

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as witnesses in behalf of –	complainant			_in a cause p	ending in our Circui
Court of Baldwin County	, of said State, wherein -	NANCY	ELLEN J	TMERSON	NIEMEYER
		· · · · · · · · · · · · · · · · · · ·			
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	TOEIRI EENI				Complainant—
and	JOAN HA	ROLD NIEME	YER	<u> </u>	
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on oath to be by you adm	ninistered, upon <u>the</u>	em			· · · · · · · · · · · · · · · · · · ·
to take and certify the dep	position_S_ of the witne	sses_ and re	turn the sa	me to our (	Court with all Con
venient speed, under your	•			inc to our t	bourt, with an Con-
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Witness <u>20t資</u>	day of	May	41	-, 19 <u>40</u> .	
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	•	•			REGISTER
Commissioner's Fee \$	•				

Nancy Ellen Jimerson Niemeyer

Complainant

State of Alabama

In the Circuit Court

of Baldwin County

John Harold Niemeyer

Respondent

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

Comes the Solicitor, Richard J. Demeree, representing the Complainant in the above mentioned cause, and moves your Honor that the sum of Thirty-five Dollars \$35.00 be adjudged a reasonable fee for his services in the above styled cause, and that the Register of the Court be ordered to pay over said sum from the amount placed on deposit with the Register by the Respondent.

This	day	oť,	g geggegggeben hjeger – y mages pringstigt de strope i fattigen i de strope til de strope til de strope til de	1940.
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Judge Circuit Court, in Equity

NANCY ELLEN JIMERSON NIEMEYER COMPLAINANT

-VS-

JOHN HAROLD NIEMEYER
RESPONDENT

IN THE CIRCUIT COURT

OF BALDWIN COUNTY

ALABAMA

IN EQUITY.

TO THE HONORABLE F. W. HARE, JUDGE IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY.

Your Oratrix, Nancy Ellen Jimerson Niemeyer, shows unto your Honor that she is a resident of the County of Baldwin, State of Alabama, and is an infant over the age of nineteen years; that John Harold Niemeyer, the respondent, is a resident of Baldwin County, State of Alabama, is over the age of twenty-one years, and thereupon your Oratrix complains and shows unto the Court and your Honor as follows:

- i. Your Oratrix shows unto your Honor that Oratrix has been a bona fide resident of this State for one year next preceding the filing of this bill.
- 2. That Oratrix and Respondent inter-married on or about the 30th day of March 1939 in the City of Pensacola, State of Florida, and ever since have been and now are, husband and wife.
- 3. That on diverse occasions between the date of March 30th, 1939 and the dat e of filing this bill, Respondent has conducted himself toward Oratrix in such a manner as to cause her to be apprehensive of violence attended with danger to life, limb or health of said Oratrix; and that Respondent has been guilty of extreme and repeated cruelty to Oratrix.

#### PRAYER FOR PROCESS

Your Oratrix also prays your Honor to grant to her all appropriate and legal process and that the same be directed to the said John Harold Niemeyer, Respondent, commanding him to personally appear before the Honorable Court within the time required by law, and to then and there answer fully and completely the several paragraphs of this Bill of Complaint, and that he be required to abide and obey all orders and decrees of this Court, which to your Honor may seem meet and proper.

STATE OF ALABAMA )
COUNTY OF BALDWIN )

Nancy Ellen Jimerson Niemeyer, being duly sworn, says that she is the Complainant whose name is subscribed to the foregoing Bill of Complaint; that she has heard the above Bill of Complaint read, and knows the contents thereof; that the said Bill of Complaint is true of her own knowledge; except as to the matters and things therein stated to be upon information and belief, and as to those matters and things she believes it to be true.

Nancy Ellin Jimuson Kiemya

Subscribed and sworn to by the said Narcy Ellen

Jimerson Niemeyer before me, this 9 day of May, A. D. 1940.

Sayle Wilder Notary Public My comm. exp. Oct 8, 1940

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The State of Alabama

Baldwin County

In Circuit Court, In Equity

Mancy Ellen Jimerson

Wiemeyer

vs. Complainant.

John Harold Miemeyer

DIVORCE DECREE

Law Office

Richard J. Demeree
Fairhope, Alabama

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## The State of Michaella Bulletin County

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Filed May 20th, 1940
R. S. DUCK, Register.
R. S. Quel, Register.

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## THE STATE OF ALABAMA Baldwin County

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

Nancy Ellen Jimerson Niemeyer	COMPLAINANT
VS.	•
John Harold Niemeyer	RESPONDENT
I, <u>Carl L. Bloxham</u>	
as Register and Commissioner	
have called and caused to come before me Nancy Ellen Ji	mergon Nieweyer and
Gail M. Ness	
witnesses named in the Requirement for Oral Examination, or	n the <u>21st</u> day of May
1940, at the office of Carl L. Bloxham	
in <u>Fairhone</u> , Alabama, and having first sworn	n said witness <sup>e.s</sup> to speak the truth
the whole truth, and nothing but the truth, the said Nancy E	
and Gail M. Ness doth depose and say	as follows:
My name is Nancy Ellen Jimerson Niemeye of age and the Complainant in this cause.	I am a resident for
one wear and over in the State of Alabama	County of Baldwin and
dity of Fairhone. The Respondent was over	the age of twenty-one
and lawfully married to me on the 30th Mar	ch 1939 at rensacora
Florida. I left my husband the latter part	
I have not lived with him since. During the 1939 Respondent rose up in bed and threat	
lost his temper. I was afraid to live with	
seriously hurt me. I can support myself ar	nd want a divorce and
want to resume my maiden name. We have no	
under oath that Respondents conduct was suc	ch on numerous other
occassions as to put me increar of violence	ion Vieneyer
My name is Gail M. Ness. I amva reside	ent of Fairhope,
Baldwin County, Alabama and I know that bot	th Complainant and
Respondent are residents of Alabama for over	er one year. I know
that Complainant is nineteen and that Responder I know that they were married in Pens	sacola on March 30th
1930 and that they separated the latter par	rt of August 1939.
They hoth lived in my home and I repeatedly	7 heard them
quarrel. I have heard Respondent, in an us	sly mood threaten to
NIT COMPANIANT I KNOW CHAO CHEY MOVE HO	

gail M. Ness

I, Carl L. Bloxham

								aken down in writing by me	
								signed the same in the pror of Complainant	esence
					•				
	_			·		_		knowledge of personal iden of said witness <sup>©S</sup> ; that I am	•
		_			÷		_	nanner interested in the result $t$	٠.
I enclo	ose the	said (	Oral Exa	ımination	in an e	nvelope	e to the	e Register of said Court.	•
Given	under 1	ny ha	nd and	seal, this_	21st	<del>7</del> _day	of _	<u>Мау</u> , 1	.9 <sup>40</sup>
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STATE OF ALAB	Baldwin County	IN CIRCUIT COURT, IN EQU	1					RECORDED IN Page-	
STA	<b>B</b>		Ellen		aro]		ORAL	RE	
THE		IN C	l l		John Harold		0		
No.	- 1		Nancy		Joh			Filed	

as Register and Commissioner hereby certify

## The State of Alabama, {

### CIRCUIT COURT. (Equity)

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TOPKA THE STATE OF	And the second second
Many Slew Dimerson	Mennyer
(134)	

14. Term, 194

John Hantle Numeyor

BILL OF COSTS

REGISTER'S FEES	AMOUNT	SHERIFF'S FEES:	AMC	UNT
Face in Circuit Count	100	Summoning on Bill, Each Defendant	1	5-0
Fees in Circuit Court— Docketing Cause, One fee only of	50	Executing Writ of Injunction, or Ne Exect, each1.50		
Issuing Summons on Bill, each50*	40	Executing Subpoenas for Witnesses, each65		
Issuing Copies Thereof, each	استو را	Executing Writs of Possession, each		
Entering Return of Same, each,	•	Executing Scire Pacias or Notice, each		N
Orders of Publication to Non-Residents, each 1.00*	J <sub>4</sub> 0	Taking and Approving Bonds, each		Z.
Filing Bill or Other Paper, each		Impaneling Jury		
Copies of Same, Per 100 Words	3 3	Collecting Execution for Costs Only, each1.50		
Entering Appearances, each	12.0	Sheriff's Commissions		
Issuing Writs of Injunction, Ne Exeat, each1.50				
Issuing Copies Thereof, each			<u> </u>	\ <u>.</u>
Entering Return of Same, each		Total Sheriff's Fees	/	370
Decrees Pro Confesso, each				<u>:</u>
Order Appointing Guardian Ad Litem, each1.00*	50			
Issuing Commissions to Take Testimony, each 50	13.0			
Taking Testimony, Per Day1.50		SUMMARY OF FEES, COSTS, AND JUDGMENT		
Taking Testimony, Per 100 words		Fees in Circuit Court—	. 9	25
Receiving and Filing Depositions, each pkg.,10	100	Register's Fees	'	1
Indorsing Depositions Published, each pkg.,10		Ex-Register's Fees	/	50
All Entries on Commission Docket, Each Cause50	- 7	Sheriff's Fees		er.
Entering Order Submitting Cases for Decree, each50	5 D	Ex-Sheriff's Fees		25
Other Orders of Court, each		Witness Fees Commissioner's Fees Loud L. Blopham.		.a =>
Noting Testimony on Hearing of Cause, each50	-		5	D D
Entering Decrees, of 500 Words of Less, each	75	Guardian Ad Litem		
Per 100 words over 50015		Publisher's Fees	1	
Taking Accounts, etc., on Ref., per Day3.00*		Solicitor's Fees	1	
Taking Testimony on Reference Relating to Trustee, etc., per 100 words		Court Reporter's Fees, Per Day or fraction thereof .5.00	3	A.3
Reference and Reports, each2.00*		Trial Tax	9	3-0
Reports of 500 Words or Less			i	,
Per 100 Words over 500			-	
Issuing Subpoenas for Witnesses, each			مبر 🖳	45
Issuing Witness Certificates, each		Fees and Costs in Inferior Court:	1 /8	, [ ]
All Entries on Subpoena Docket, each Cause50		Clerk of Inferior Court Fees		
Taking and Approving Bonds, each		Sheriff's Fees		
Making Complete Record, per 100 Words	360	Witness Fees	ļ	
Hearing, etc., Regarding Appointment of Re-				
ceiver or Trustee		Total Fees and Costs in Inferior Court		
Settlements with Receiver or Trustee, each3.00		Total Fees and Costs in Interior Court	}	
Examining Vouchers in Settlements, each		ļ		
Examining Answers on Exceptions, each Answer 3.00	]		<u>'</u>	
Removal Disabilities on Non-Age		Total Fees and Costs		1
Commissions on Sales		Judgment	ĺ	
Making Deeds to Property Sold, each2.00				
Receiving and Paying Out Money Other Than That Arising from Sales				
Certificates or Affidavits, with Seal, each50		Total Fees, Costs, and Judgment		
Certificates or Affidavits without Seal, each25				*
Issuing Scire Facias or other Notice, each				
Other Orders of Register, except Cont., each 50		A A A	1	
Entering Certificates of Supreme Court, each50		50.00 dyout 18.75 Court evets 31,25		
Transcript for Supreme Court, per 100 words, each15		18.75 Come to a t		
Additional Copies, per 100 words		,1-		
Appeal Bond, each		1,23	1 	
Certificate of Appeal, each		J ''		
Notice of Appeal, each				1
Report to State Board of Health, each case50				
Certificate of Judgment, each				1
Issuing Executions, each			1	
Entering Returns Thereof, each				
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Total Register's Fees	925			

#### PALIE FOR RELIEF

Your Oratrix prays that the bonds of matrimony between herself and the Respondent be dissolved.

That a portion of Respondent's property be allowed and set apart to Complainant as shall be equitable and just, and that the Respondent be enjoined and restrained from disposing of or in any manner incumbering his equity in the house in Fairhope Alabama which Respondent purchased from Thee Bank of Fairhope and in which we formerly resided.

Your Cratrix further prays that the Respondent may be required to pay a reasonable sum in the Court to defray the expenses of this action and for counsel fees.

And that your Oratrix may be permitted to resume her maiden name of Namoy Ellen Jimerson.

And that sixty days after the awarding of a Final Decree dissolving the bonds of matrimony that Oratrix may be permitted to remarry.

Your Dratrix further prays for such other, further and general relief as she may be entitled to in equity and good Conscience.

Manay Eller Johnson Simuya Ruland & Demere Bollot for Complainants

STATE OF ALABAMA COUNTY OF BALDWIN

to any sheriff in the state of Alabama:

You are hereby commanded to summen John Harold Niemeyer who resides at Fairhope Alabama and employed by Gaston Meter Company, Fairhope, Alabama to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, to be held for said County at the place of holding the same, then and there to answer the Bill of Complaint of Nanoy Ellen Jimerson Niemeyer.

Witness my hand this 10 th day of May 1940.

Register in Chancery

NANCY ELLEN JIMERSON MINUSYER
COMPLAINANT

- VI

IN THE CIRCUIT GOURT

OF BALDWIN COUNTY

ALABAMA

IN EQUITY.

JOHN HAROLD NIEMBYER RESPONDENT

TO THE HONORABLE F. W. HARE, JUDGE IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY.

Your Gratrix, Namey Ellen Jimerson Niemeyer, shows unto your Honor that she is a resident of the County of Baldwin, State of Alabama, and is an infant over the age of nineteen years; that John Harold Niemeyer, the respondent, is a resident of Baldwin County, State of Alabama, is over the age of twenty-one years, and thereupon your Gratrix complains and shows unto the Court and your Honor as follows:

- 1. Your Oratrix shows unto your Honor that Oratrix has been a bone Figo resident of this State for one year next preceding the filing of this bill.
- 2. That Cratrix and Respondent inter-married on or about the 30th day of March 1939 in the City of Pensacola, State of Florida, and over since have been and now are, husband and wife.
- March 30th, 1939 and the date of filing this bill, Respondent has conducted himself toward Cratrix in such a manner as to cause her to be apprehensive of violence attended with danger to life, limb or health of said Cratria; and that Respondent has been guilty of extreme and repeated cruelty to Cratria.

  PRAIRE FOR FROCESS

Your Oratrix also prays your Honor to grant to her all appropriate and legal process and that the same be directed to the said John Harold Niemeyer, Respondent, commanding him to personally appear before the Honorable Court within the time required by law, and to then and there answer fully and completely the several paragraphs of this Bill of Complaint, and that he be required to abide and obey all orders and decrees of this Court, which to your Honor may seem meet and proper.

NANCY ELLEN JIMERSON NIEMEYER,	THE STATE OF ALABAMA
Complainant,	Baldwin County
vs.	
JOHN HAROLD NIEMEYER,	IN EQUITY
Respondent.	Circuit Court of Baldwin County
This cause is submitted in behalf of Complainant	upon the original Bill of Complaint,
Answer and Waiver, and Testimony	of Nancy Ellen Jimerson Niemeyer
and Gail M. Ness;	
.* ***	
and in behalf of Thefandant upon	,
and in behalf of Defendant upon	
	*
	R.S. Duch
	Register.



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BALDWIN COUNTY

NANCY ELLEN JIMERSON NIEMEYER Complainant

VS

JOHN HAROLD NIEMEYER Respondent

IN EQUITY

BILL OF COMPLAINT:

Filed May 10, 1940 R.S. Duch, Register

Law Office Richard J. Demerce Fairhope, Alabama 1 628 THE STORES

STATE OF ALABAMA

BALDWIN COUNTY

NANCY ELLEN JIMERSON NIEMEYER Complainant

vs

JOHN HAROLD NIEMEYER Respondent

IN EQUITY

BILL OF COMPLAINT

Filed May 10 1940 R. S. Durch, Register

Law Office Richard J. Demerce

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#### STATEMENT

#### FAIRHOPE, ALABAMA June 1, 1940 193

M R. L. Duck, County Court Clerk

IN ACCOUNT WITH

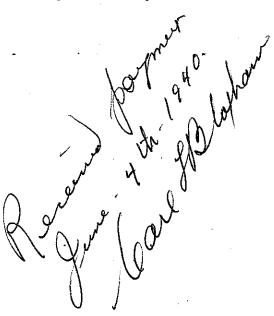
## CARL L. BLOXHAM

REAL ESTATE AND INSURANCE

Office 56 --- PHONES -- Residence 70

Services as Commissioner Divorce Case Niemyer vs Niemyer

\$5.00



STATE OF ALABAMA BALDWIN COUNTY	No	Term, 193
Nancy Ellen Jimerson N John Harold Niemever	lemeyer Vs.	, Complainant
To R. S Duck	, Register :	, December 1
and evidence having been taken, a	a Decree Pro Confesso having been and the cause being ready for submi	ssion for final decree, and no
defense having been interposed, the C	complainant, by Richard J. Deme	with the Register of this Court
this written request to deliver the pa	apers in this cause to the Judge for final	decree in vacation.

#### RECORDED

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