Nancy Ellen Jimerson Niemeyer Complainant	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY ALABAMA IN EQUITY
vs	)	
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:

1) I admit the allegations in Count 1.

2) 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 pay into the Court the sum of Fifty-Dollars ($50.00) for the purpose of paying Court costs and reasonable attorney fees for Complainant.

Signed John Harold Niemeyer
Respondent

State of Alabama)
County of Baldwin)

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

Gayle Wilder

My commission expires October 7, 1940.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Nancy Ellen Jimerson Niemeyer Complainant

vs.

John Harold Niemeyer Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Deposition and Testimony 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 Defendant be, and the same are hereby, dissolved, and that the said Nancy Ellen Jimerson Niemeyer is forever divorced from the said John Harold Niemeyer for and on account of reasonable apprehension of violence attendant with danger to life limb and health.

It is further ordered, adjudged and decreed that Complainant be permitted to resume her maiden name of Nancy Ellen Jimerson and that the title to the personal property removed from the marital domicile by Complainant be declared quiet in her.

The Register is directed to pay over to Complainant's Solicitor any sum paid into Court by Respondent over and above costs of Court.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that Complainant and Respondent be, and they hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that John Harold Niemeyer the Respondent pay the cost herein to be taxed, for which execution may issue.

This 25th day of May, 1940

F. W. HARE,
Judge Circuit Court, in Equity.

I, Alice J. Duck, Register of the Circuit Court for Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day of _____, 19____

Register of Circuit Court, in Equity.

Code 1923—Sec. 7425-7426.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Nancy Ellen Jimerson Niemeyer Complainant

vs.

John Harold Niemeyer Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Depositions and Testimony 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 Defendant be, and the same are hereby, dissolved, and that the said Nancy Ellen Jimerson Niemeyer is forever divorced from the said John Harold Niemeyer for and on account of reasonable apprehension of violence attendant with danger to life and limb and health.

It is further ordered, adjudged, and decreed that Complainant be permitted to resume her maiden name of Nancy Ellen Jimerson ~~and that the title to the personal property removed from the marital domicile by Complainant be declared quiet in her.~~

The Register is directed to pay over to Complainant's Solicitor any sum paid into Court by Respondent over and above Costs of Court.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that Complainant and Respondent be, and ~~they are~~ hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that John Harold Niemeyer the Respondent pay the cost herein to be taxed, for which execution may issue.

This 25th day of May, 1940

F M Hare
Judge Circuit Court, in Equity.

I, _____, Register of the Circuit Court for Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the _____ day of _____, 19____

_____
Register of Circuit Court, in Equity.

Code 1923—Sec. 7425-7426.

EQUITY COST BILL

Moore Printing Co., Bay Minette, Ala.

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT. (Equity)

May Term, 194 2

Mary Ellen Jimerson Kennyon

No. 625 vs.

John Harold Kennyon

BILL OF COSTS

REGISTER'S FEES	AMOUNT
Fees in Circuit Court— Docketing Cause, One fee only of 1.00	1 00
Issuing Summons on Bill, each ..... .50*	50
Issuing Copies Thereof, each ..... .40	40
Entering Return of Same, each ..... .15	15
Orders of Publication to Non-Residents, each 1.00*	
Filing Bill or Other Paper, each ..... .10	40
Copies of Same, Per 100 Words ..... .15	
Entering Appearances, each ..... .25*	25
Issuing Writs of Injunction, Ne Exeat, each 1.50	
Issuing Copies Thereof, each ..... .50	
Entering Return of Same, each ..... .15	
Decrees Pro Confesso, each 1.00*	
Order Appointing Guardian Ad Litem, each 1.00*	
Issuing Commissions to Take Testimony, each ..... .50	50
Taking Testimony, Per Day 1.50	
Taking Testimony, Per 100 words ..... .20	
Receiving and Filing Depositions, each pkg., ... .10	10
Indorsing Depositions Published, each pkg., ... .10	10
All Entries on Commission Docket, Each Cause ..... .50	
Entering Order Submitting Cases for Decree, each ..... .50	50
Other Orders of Court, each ..... .25	
Noting Testimony on Hearing of Cause, each ..... .50	
Entering Decrees, of 500 Words of Less, each ..... .75	75
Per 100 words over 500 ..... .15	
Taking Accounts, etc., on Ref., per Day 3.00*	
Taking Testimony on Reference Relating to Trustee, etc., per 100 words ..... .15	
Reference and Reports, each 2.00*	
Reports of 500 Words or Less 2.50	
Per 100 Words over 500 ..... .15	
Issuing Subpoenas for Witnesses, each ..... .25	
Issuing Witness Certificates, each ..... .25	
All Entries on Subpoena Docket, each Cause ..... .50	
Taking and Approving Bonds, each 1.00	
Making Complete Record, per 100 Words ..... .15	3 60
Hearing, etc., Regarding Appointment of Receiver or Trustee 3.00	
Settlements with Receiver or Trustee, each 3.00	
Examining Vouchers in Settlements, each ..... .10	
Examining Answers on Exceptions, each Answer 3.00	
Removal Disabilities on Non-Age	
Commissions on Sales	
Making Deeds to Property Sold, each 2.00	
Receiving and Paying Out Money Other Than That Arising from Sales	
Certificates or Affidavits, with Seal, each ..... .50	
Certificates or Affidavits without Seal, each ..... .25	
Issuing Scire Facias or other Notice, each ..... .50	
Other Orders of Register, except Cont., each ..... .50	
Entering Certificates of Supreme Court, each ..... .50	
Transcript for Supreme Court, per 100 words, each ..... .15	
Additional Copies, per 100 words ..... .05	
Appeal Bond, each 1.00	
Certificate of Appeal, each ..... .50	
Notice of Appeal, each ..... .50	
Report to State Board of Health, each case ..... .50	
Certificate of Judgment, each ..... .25	
Issuing Executions, each ..... .75	
Entering Returns Thereof, each ..... .15	
Certified Copy of Decree	1 00
Total Register's Fees	9 25

SHERIFF'S FEES:	AMOUNT
Summoning on Bill, Each Defendant 1.50	1 50
Executing Writ of Injunction, or Ne Exeat, each 1.50	
Executing Subpoenas for Witnesses, each ..... .65	
Executing Writs of Possession, each 5.00	
Executing Scire Pacias or Notice, each 1.50	
Taking and Approving Bonds, each 1.00	
Impaneling Jury ..... .75	
Collecting Execution for Costs Only, each 1.50	
Sheriff's Commissions	
Total Sheriff's Fees	1 50

SUMMARY OF FEES, COSTS, AND JUDGMENT

Fees in Circuit Court—	
Register's Fees	9 25
Ex-Register's Fees	
Sheriff's Fees	1 50
Ex-Sheriff's Fees	
Witness Fees	
Commissioner's Fees Carl L. Blapham	5 00
Guardian Ad Litem	
Publisher's Fees	
Solicitor's Fees	
Court Reporter's Fees, Per Day or fraction thereof 5.00	
Trial Tax 3.00	3 00
Fees and Costs in Inferior Court:	18.75
Clerk of Inferior Court Fees	
Sheriff's Fees	
Witness Fees	
Total Fees and Costs in Inferior Court	
Total Fees and Costs	
Judgment	
Total Fees, Costs, and Judgment	

50.00 deposit
18.75 Court costs
31.25

31.25
18.75
50.00

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:

1. 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.

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

Nancy Ellen Jimerson Niemeyer
Complainant

Richard J. Demouce
Solicitor for Complainant

STATE OF ALABAMA }
COUNTY OF BALDWIN } TO ANY SHERIFF IN THE STATE OF ALABAMA:

You are hereby commanded to summon John Harold Niemeyer who resides at Fairhope Alabama and employed by Gaston 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 answer the Bill of Complaint of Nancy Ellen Jimerson Niemeyer.

Witness my hand this 10th day of May 1940.

R. S. Duck
Register in Chancery

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 Ellen Jimerson Niemeyer

Subscribed and sworn to by the said Nancy Ellen Jimerson Niemeyer before me, this 9th day of May, A. D. 1940.

Gayle Wieder
Notary Public
My Comm exp Oct 8, 1940

Commission To Take Depositions.

Printed by The Baldwin Times, Bay Minette.

THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT

TO CARL L. BLOXHAM

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Nancy Ellen Jimerson Niemeyer and Gail M. Ness

as witnesses in behalf of complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein NANCY ELLEN JIMERSON NIEMEYER

is Complainant

and JOHN HAROLD NIEMEYER

is Defendant,

on oath to be by you administered, upon them

to take and certify the deposition s of the witness es and return the same to our Court, with all Convenient speed, under your hand.

Witness 20th day of May, 19 40.

R. S. Owen

REGISTER

Commissioner's Fee $

Witness' Fees, $

Nancy Ellen Jimerson Niemeyer Complainant vs John Harold Niemeyer Respondent	)	State of Alabama In the Circuit Court of Baldwin County In Equity

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_____ of _____ 1940.

_____

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:

1. 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.

Dent

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 Ellen Jimerson Niemeyer

Subscribed and sworn to by the said Nancy Ellen Jimerson Niemeyer before me, this 9th day of May, A. D. 1940.

Gayle Wilder
Notary Public
My comm. exp. Oct 8, 1943

No._____ Page_____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Nancy Ellen Jimerson Niemeyer

vs. Complainant.

John Harold Niemeyer

Respondent.

DIVORCE DECREE

Filed May 27, 1940
R. S. Buck, Register

Law Office
Richard J. Demeree
Fairhope, Alabama

No. _____ Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Nancy Ellen Jimerson Niemeyer

vs. Complainant.

John Harold Niemeyer

Respondent.

DIVORCE DECREE

Law Office
Richard J. Demeree
Fairhope, Alabama

RECORDED

ANSWER

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

ORAL DEPOSITION

Baldwin Times 10-27-39 ½M

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, Carl L. Bloxham

as Register and Commissioner

have called and caused to come before me Nancy Ellen Jimerson Niemeyer and Gail M. Ness

witness~~es~~ named in the Requirement for Oral Examination, on the 21st day of May 1940, at the office of Carl L. Bloxham in Fairhope, Alabama, and having first sworn said witness~~es~~ to speak the truth, the whole truth, and nothing but the truth, the said Nancy Ellen Jimerson Niemeyer and Gail M. Ness doth depose and say as follows:

My name is Nancy Ellen Jimerson Niemeyer. I am nineteen years of age and the Complainant in this cause. I am a resident for one year and over in the State of Alabama County of Baldwin and City of Fairhope. The Respondent was over the age of twenty-one and lawfully married to me on the 30th March 1939 at Pensacola Florida. I left my husband the latter part of August 1939 and I have not lived with him since. During the first part of August 1939 Respondent rose up in bed and threatened to hit me. He lost his temper. I was afraid to live with him because he will seriously hurt me. I can support myself and want a divorce and want to resume my maiden name. We have no children. I state under oath that Respondents conduct was such on numerous other occassions as to put me in fear of violence.

Nancy Ellen Jimerson Niemeyer

My name is Gail M. Ness. I am a resident of Fairhope, Baldwin County, Alabama and I know that both Complainant and Respondent are residents of Alabama for over one year. I know that Complainant is nineteen and that Respondent is over twenty-one. I know that they were married in Pensacola on March 30th 1939 and that they separated the latter part of August 1939. They both lived in my home and I repeatedly heard them quarrel. I have heard Respondent, in an ugly mood threaten to hit Complainant. I know that they have no children.

Gail M. Ness

ORAL EXAMINATION

I, Carl L. Bloxham, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down in writing by me in the words of the witness and read over to them and both signed the same in the presence of myself and Richard J. Demeree, Solicitor of Complainant 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 21st day of May, 1940.

Carl L Bloxham (L. S.)

RECORDED

No. _____ Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Nancy Ellen Jimerson Niemeyer
Complainant

Vs.

John Harold Niemeyer
Respondent

ORAL DEPOSITION

Filed May 23, 1940
R. S. Deck, Register

RECORDED IN

Record

Vol. _____ Page _____

Register

EQUITY COST BILL

Moore Printing Co., Bay Minette, Ala.

The State of Alabama, BALDWIN COUNTY

CIRCUIT COURT. (Equity)

May Term, 194 2

Mary Ellen Simmons Neuman

No. 628 vs.

John Harold Neuman

BILL OF COSTS

REGISTER'S FEES	AMOUNT
Fees in Circuit Court— Docketing Cause, One fee only of 1.00	1 00
Issuing Summons on Bill, each ..... .50*	50
Issuing Copies Thereof, each ..... .40	40
Entering Return of Same, each ..... .15	15
Orders of Publication to Non-Residents, each 1.00*	
Filing Bill or Other Paper, each ..... .10	40
Copies of Same, Per 100 Words ..... .15	
Entering Appearances, each ..... .25*	25
Issuing Writs of Injunction, Ne Exeat, each 1.50	
Issuing Copies Thereof, each ..... .50	
Entering Return of Same, each ..... .15	
Decrees Pro Confesso, each 1.00*	
Order Appointing Guardian Ad Litem, each 1.00*	
Issuing Commissions to Take Testimony, each ..... .50	50
Taking Testimony, Per Day 1.50	
Taking Testimony, Per 100 words ..... .20	
Receiving and Filing Depositions, each pkg., ... .10	10
Indorsing Depositions Published, each pkg., ... .10	10
All Entries on Commission Docket, Each Cause ..... .50	
Entering Order Submitting Cases for Decree, each ..... .50	50
Other Orders of Court, each ..... .25	
Noting Testimony on Hearing of Cause, each ..... .50	
Entering Decrees, of 500 Words of Less, each ..... .75	75
Per 100 words over 500 ..... .15	
Taking Accounts, etc., on Ref., per Day 3.00*	
Taking Testimony on Reference Relating to Trustee, etc., per 100 words ..... .15	
Reference and Reports, each 2.00*	
Reports of 500 Words or Less 2.50	
Per 100 Words over 500 ..... .15	
Issuing Subpoenas for Witnesses, each ..... .25	
Issuing Witness Certificates, each ..... .25	
All Entries on Subpoena Docket, each Cause ..... .50	
Taking and Approving Bonds, each 1.00	
Making Complete Record, per 100 Words ..... .15	3 60
Hearing, etc., Regarding Appointment of Receiver or Trustee 3.00	
Settlements with Receiver or Trustee, each 3.00	
Examining Vouchers in Settlements, each ..... .10	
Examining Answers on Exceptions, each Answer 3.00	
Removal Disabilities on Non-Age	
Commissions on Sales	
Making Deeds to Property Sold, each 2.00	
Receiving and Paying Out Money Other Than That Arising from Sales	
Certificates or Affidavits, with Seal, each ..... .50	
Certificates or Affidavits without Seal, each ..... .25	
Issuing Scire Facias or other Notice, each ..... .50	
Other Orders of Register, except Cont., each ..... .50	
Entering Certificates of Supreme Court, each ..... .50	
Transcript for Supreme Court, per 100 words, each ..... .15	
Additional Copies, per 100 words ..... .05	
Appeal Bond, each 1.00	
Certificate of Appeal, each ..... .50	
Notice of Appeal, each ..... .50	
Report to State Board of Health, each case ..... .50	
Certificate of Judgment, each ..... .25	
Issuing Executions, each ..... .75	
Entering Returns Thereof, each ..... .15	
Certified Copy of Decree	1 00
Total Register's Fees	9 25

SHERIFF'S FEES:	AMOUNT
Summoning on Bill, Each Defendant 1.50	1 50
Executing Writ of Injunction, or Ne Exeat, each 1.50	
Executing Subpoenas for Witnesses, each ..... .65	
Executing Writs of Possession, each 5.00	
Executing Scire Facias or Notice, each 1.50	
Taking and Approving Bonds, each 1.00	
Impaneling Jury ..... .75	
Collecting Execution for Costs Only, each 1.50	
Sheriff's Commissions	
Total Sheriff's Fees	1 50

SUMMARY OF FEES, COSTS, AND JUDGMENT

Fees in Circuit Court—	
Register's Fees	9 25
Ex-Register's Fees	
Sheriff's Fees	1 50
Ex-Sheriff's Fees	
Witness Fees	
Commissioner's Fees Carl L. Blapham	5 00
Guardian Ad Litem	
Publisher's Fees	
Solicitor's Fees	
Court Reporter's Fees, Per Day or fraction thereof .5.00	
Trial Tax 3.00	3 00
Fees and Costs in Inferior Court:	18.75
Clerk of Inferior Court Fees	
Sheriff's Fees	
Witness Fees	
Total Fees and Costs in Inferior Court	
Total Fees and Costs	
Judgment	
Total Fees, Costs, and Judgment	

50.00 deposit
18.75 Court costs
31.25

31.25
18.75
50.00

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

Nancy Ellen Jimerson Niemeyer
Complainant

Richard J. Demouce
Solicitor for Complainant

STATE OF ALABAMA)
) TO ANY SHERIFF IN THE STATE OF ALABAMA:
COUNTY OF BALDWIN)

You are hereby commanded to summon John Harold Niemeyer who resides at Fairhope Alabama and employed by Gaston 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 answer the Bill of Complaint of Nancy Ellen Jimerson Niemeyer.

Witness my hand this 10th day of May 1940.

R. S. Deck
Register in Chancery

NANCY ELLEN JIMERSON NIEMEYER COMPLAINANT	IN THE CIRCUIT COURT OF BALDWIN COUNTY ALABAMA IN EQUITY.
-vs-	
JOHN HAROLD NIEMEYER RESPONDENT	

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:

1. 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.

8581. NOTE OF TESTIMONY

MOORE PRINTING CO., BAY MINETTE, ALA.

NANCY ELLEN JIMERSON NIEMEYER,
Complainant,

vs.

JOHN HAROLD NIEMEYER,
Respondent.

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, Answer and Waiver, and Testimony of Nancy Ellen Jimerson Niemeyer and Gail M. Ness;

and in behalf of Defendant upon

R. S. Deck
Register.

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

_____

_____

_____

VS.

_____

_____

_____

NOTE OF TESTIMONY

Filed in Open Court this 23

day of May 1940

R. S. Arnold

REGISTER

MOORE PRINTING CO., BAY MINETTE, ALA.

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. Deuch, Register

Law Office
Richard J. Demeree
Fairhope, Alabama

Page 1 628 Foley, Ala.

RECORDED

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. Dick, Register

Law Office
Richard J. Demeree

Received in Sheriff Office
this the 10th day of May 1940
W. R. Stuart Sheriff

Executed this 13th day of May 1940

~~By reading the within~~

~~named Defendant~~

~~and placing him~~

Sheriff

D. S.

Executed this the 13th day of May 1940 by serving a copy of the within Complaint on John Harold Niemeyer

W. R. Stuart
Sheriff

by
A. P. R.

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

Received payment
June 4th. 1940.
Carl L Bloxham

8550 REQUEST FOR DECREE IN VACATION. Moore Ptg. Co.

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No._____ _____Term, 193__

Nancy Ellen Jimerson Niemeyer, Complainant

Vs.

John Harold Niemeyer, Defendant

To R. S Duck, Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Richard J. Demeree _____ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Richard J Demeree
Solicitor for Complainant.

RECORDED

No._____ Page_____

The State of Alabama,
Baldwin County.
CIRCUIT COURT, IN EQUITY

Nancy Ellen Jimerson Niemeyer

Vs.

John Harold Niemeyer

REQUEST FOR DECREE IN VACATION

Filed May 23, 1940, 193.

R. S. Peck
Register.

Recorded in _____ Record

Vol._____ Page_____

Register.

Moore Ptg. Co. Bay Minette