

JOHN WILLIAM HEANEY
FRANCIS PRICE
A. C. POSTEL
HAROLD A. PARMA
CLARENCE A. ROGERS
KENNETH W. WATTERS, JR.

HEANEY, PRICE, POSTEL & PARMA
COUNSELLORS AT LAW
21 E. CANON PERDIDO STREET
SANTA BARBARA, CALIFORNIA
CABLE ADDRESS "JARRETT"

MARGARET DUNN KAMPER
FRANCIS PRICE, JR.

May 26, 1944

Hon. George A. Bartlett
Cheney Bldg.
Reno, Nevada

My dear Judge:

Once again by mail I enter your domain with the request for a favor.

Elizabeth [redacted] is the wife of Chester [redacted] of this city who has been for many years employed by the First National Bank. He has in the course of these years extended many courtesies to me and I feel obligated to return the courtesies to him as far as I can. His wife and he separated several months ago. She has been teaching school. Her school term expires in about three weeks so that she should be in Reno somewhere about the 15th of June. They have an adopted child, David, age seven years. A property settlement agreement dividing the community property, consisting of household furnishings, automobile and insurance, was agreed upon and she will bring her copy with her. The result of this situation is that so far as both parties are concerned they are starting independently financially.

Mr. [redacted] has agreed to defray the cost of the action in Reno and I am wondering if you could afford to handle this for him for a fee to yourself of \$150.00. I have advised him that the court costs are approximately \$20.00 to \$25.00, which is independent of your fee.

I have further advised him that it will be necessary for someone to appear on his behalf, which would incur a further cost of \$50.00. Could I save this for him by appearing in the action by filing an answer, which, we might stipulate as between ourselves, need not be verified. At the time I file the answer, I would file his power of attorney appointing me his attorney. I would likewise forward you a stipulation undated as to time, stipulating for the hearing of the action at that time and place without previous notice. I would not expect to appear in the action, except as above indicated.

I am a regular member of the bar in good standing, but

Hon. George A. Bartlett - #2

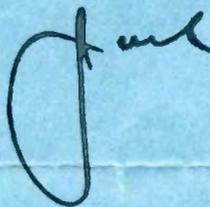
it seems that despite my annual payment of dues you now have another rule, as I understand it, that bars one from actual court appearance unless he is associated with an attorney who practices and who lives in Nevada. Do your rules bar me from following the course that I have indicated?

Mrs. [redacted] thought that she might camp out, as she is fond of the open, but the objection that I saw to this is that she might not be able to prove continuous residence by a corroborating witness. If she camps, she is planning on bringing with her a woman friend of hers. Would her testimony be accepted, and would one living in a tent be deemed by the court to be a resident? I question in my own mind seriously whether or not this might not be a wrong slant to the residence question if brought out in court.

Your picture still adorns my wall. It may be that I might be in your direction soon. I am thinking of going to a quiet place where I will live an undisturbed life and my choice lies between Tijuana and Reno. Are you planning on coming in this direction soon?

With every good wish to you and Dorothy and with every affectionate thought to you, I am always

Sincerely and devotedly yours,

A handwritten signature in dark ink, appearing to be 'G. Bartlett', written in a cursive style.

JWH:MK

June 1, 1944

~~Mr.~~ John W. Heaney *Esq*
21 E. Canon Perdido Street
Santa Barbara, California

Dear Jack:

RE: [REDACTED]

Replying to yours of the 26th of May, the fact that you are taking care of this matter for an intimate personal friend of yours that we want to help gives to me the pleasure of assuring you that I will help, too, and there will be no plaintiffs attorney fee. As to appearance by defendant, I am enclosing to you a form of Appearance and Waiver, which speaks for itself and should be executed before a notary having a seal; if he has not a seal, then his official position should be certified to by the clerk of your court in the usual manner. This, however, should not be executed until after Mrs. [REDACTED] has taken up her residence here.

You have been wrongly advised as to court costs, however, verification and filing of complaint, \$20; filing of Appearance and Waiver, \$10; two copies of decree, \$4.50; court reporter, \$7.50 minimum.

Mrs. [REDACTED] might be able to arrange for a camping home, but she should have a witness who is an actual, and for some time past has been, resident of Nevada. This is written hurriedly and I will write you again during the resident's period, and help work out any details necessary.

With heaps of affection ever and always from Dorothy and her Dad and to One-Shot Sal, *and her dad*

With heaps of affection again,

GAB:lbw

Enclosure: form Appearance and Waiver

JOHN WILLIAM HEANEY
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CABLE ADDRESS "JARRETT"

June 9, 1944

Judge George A. Bartlett
Cheney Building
Reno, Nevada

My dear Judgy:

You are an incurable, sweet old reprobate. I used the word "reprobate" advisedly. It is my understanding that it had its origin in Nevada and means, "one incapable of reformation because the desire to reform has evaporated into the desert winds."

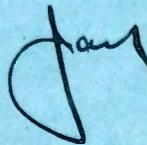
I definitely insist that you change the fee that I have suggested to Mr. [REDACTED] in connection with his matter.

I have for the time being mislaid your letter, as I took some of my correspondence home, but I'll arrange to forward you in a few days your fee and costs, as this is the only way I know to make you behave, and if you try to get gay with me then I'll ship it to you in pennies and I can just see you counting out pennies over a piece of mahogany which would, of course, be demanded of you in advance when you, in a timid voice, should order a "snort".

I am planning to leave here sometime between the 20th and first of July, to go God knows where, for a period of six weeks to two months.

The children continue well. Give my best to Dorothy.

Sincerely,



JWH:v

JOHN WILLIAM HEANEY
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CABLE ADDRESS "JARRETT"

June 13, 1944

Judge George A. Bartlett
Cheney Building
Reno, Nevada

My dear Judgey:

I think the form you forwarded for a personal appearance on behalf of Mr. [REDACTED] is satisfactory. When you have the action about to be filed if you will send me a copy of the title, court, and cause I will fill in the appearance. I do not believe this should be signed by Mr. [REDACTED] until the action is filed, and if you will wire me when this has been done, I will have it signed, notarized and returned to you.

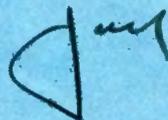
I have definitely advised against camping out. She has her own camp outfit.

The boy finishes his first year in high school a social success, scholastically not so hot. It's summer school for him, with private tutoring to bring him up to date, and next year he will go away to school where he will learn regularity of study.

Sally is in Nurses Aid, has her teeth into it and is enjoying it.

With best to you and Dorothy,

Affectionately,



JWH:v

San Bernardino, Calif.
October 2, 1944

My dear Friend,

This, I promised to do many weeks ago. You see what my promise amount to. Now it becomes urgent. School started off with a bang - ninety - nine kids to be exact! And now after less than four weeks the doctor says I must quit, for a semester at least. It seems I've been over doing and have been running a stinking little temperature. He says it is incipient T.B. & only rest will ward off the disease. So I must rest. Well, I say! But since I must rest, I've decided to accomplish one thing any way. Doc says I may do my resting at Reno so if you are not thoroughly disgusted with my "run out" act of last summer & for not having even written you since then, I shall try it again. This time I'll finish it. Chester has not started the divorce and I'm convinced he never will. I'll not come until I hear from you. I believe it will be possible for me to leave by the end of the week.

So many times, this summer, I've thought of you. For such a short acquaintance I feel as if you are a very real friend. I shall be very happy to see you again. There is much I want to tell you.

"Doc" says bedtime is 9:00 o'clock for me & since it is nearly that I must seek my downy couch. Believe me it feels good, too, after wrestling - and that's what it amounts to - that mob all day. Hoping to hear from you - soon - I am,

Sincerely

Elizabeth

527 Mt View Ave

November 8, 1944

Mr. Chester T. [REDACTED]
216 Equestrian
Santa Barbara, Calif.

Dear Mr. [REDACTED]:

Mrs. [REDACTED] has given to me your Appearance and Waiver for filing when we start our proceedings on November 21, which will enable the matter to be heard and disposed of on that date.

The purpose of this letter is to advise you of my correspondence with Jack Heney which was to the effect that the court costs inclusive of residence witness fee amount to \$48 but Jack and I are fighting about the matter of attorney's fee and as he had told me that you had been very kind to him for many years he wanted me to consider cutting my own fee down somewhat which, I, because of my affection for him, knowing his desire to help you, also to hereby cut out entirely any fee. I want you to distinctly understand that there is no attorney fee involved because it will afford me pleasure to help Jack to help a friend, so you need only consider the matter of court costs above referred to.

With kindest regards to you and dear old Jack,

Very sincerely,

Geo. A. Bartlett

GAB:ED

2 Geo. A. Bartlett
3 Attorney for Plaintiff

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5 IN THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
6 IN AND FOR THE COUNTY OF WASHOE

7 - - - -

8 ELIZABETH L. [REDACTED],)
9 Plaintiff,)
10 -vs-)
11 CHESTER T. [REDACTED],)
12 Defendant.)

13 - - - -

14 C O M P L A I N T

15 COMES NOW the plaintiff, by her attorney, Geo. A. Bartlett,
16 and for cause of action against defendant, alleges as follows:

17 I.

18 That plaintiff is now, and for more than six weeks preceding
19 the filing of this complaint, has been a bona fide resident of
20 and domiciled in the County of Washoe, State of Nevada; that
21 plaintiff, during all of said time, has been actually present
22 and domiciled in the City of Reno, County and State aforesaid;

23 II.

24 That the plaintiff and defendant were married at Glendale,
25 in the State of California, on the 15th day of August, 1928, and
26 ever since have been, and now are, wife and husband.

27 III.

28 That there is an adopted child of plaintiff and defendant,
29 David Edwin [REDACTED], of the age of ^{seven} six years.

30 IV.

That plaintiff herein makes no demand for alimony, court

1 costs nor counsel fees, all property rights, and the care,
2 custody and maintenance of the said adopted minor child, claims
3 and demands having been settled satisfactorily to the parties by
4 an agreement in writing dated March 7th, 1944; that said agree-
5 ment is in all respects just, fair, reasonable and equitable, and
6 was made with the assistance and advice of independent counsel.

7 V.

8 That during the married life of plaintiff and defendant,
9 defendant has treated the plaintiff with extreme cruelty, entire-
10 ly mental in character, which caused plaintiff great unhappiness
11 and injured her general health.

12 WHEREFORE, plaintiff prays judgment of this Honorable Court
13 as follows, to-wit:

14 That the bonds of matrimony now and heretofore existing
15 between plaintiff and defendant be forever and completely
16 dissolved, and that each party hereto be freed and released from
17 all of the responsibilities and obligations thereof, and restored
18 to the status of single persons;

19 That the settlement agreement effected between plaintiff
20 and defendant under date of March 7th, 1944, be adjudged and
21 decreed to be just, fair, reasonable and equitable, and that the
22 terms thereof be ratified, approved and adopted by the Court;

23 For such other and further relief as may appear to the
24 Court to be equitable in the premises.

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28

Attorney for Plaintiff
29
30

1 STATE OF NEVADA,)
2 COUNTY OF WASHOE.) SS:

3 ELIZABETH L. [REDACTED], being first duly sworn, deposes and says:
4 That she is the plaintiff in the above entitled action; that
5 she has read the foregoing complaint and knows the contents
6 thereof; that the same is true of her own knowledge, except as to
7 those matters therein stated on information and belief, and as to
8 those matters she believes it to be true.

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Subscribed and sworn to before me
this 21st day of November, 1944.

Notary Public in and for the County
of Washoe, State of Nevada.