

645

THE STATE OF ALABAMA, }
Baldwin County }

CIRCUIT COURT

TO ORA S. NELSON

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

as witnesses in behalf of COMPLAINANT in a cause pending in our Circuit Court of Baldwin County, of said State, wherein BLANCHE A. BRYARS CREEL

is Complainant and ROBERT C. CREEL,

is Defendant, on oath to be by you administered, upon them

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

Witness 22nd day of July, 19 40

R. S. Duck

REGISTER

Commissioner's Fee \$

Witness' Fees, \$

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WE COMMAND YOU, That you summon Robert C. Creel to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 Blanche A. Bryars Creel against the said Robert C. Creel, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent 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, R. S. Duck, Register of said Circuit Court, this 24th day of June, 1940.

R. S. Duck

Register.

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

Your Oratrix, Blanche A. Bryars Creel, presents this Bill of Complaint against Robert C. Creel, and thereupon your Oratrix complains and shows unto your Honor as follows:

1. Your Oratrix is over twenty-one years of age and is a bona fide resident citizen of Baldwin County, Alabama, where she has resided for more than one year next preceding the filing of this Bill of Complaint. The Respondent, Robert C. Creel, is over twenty-one years of age and a non-resident of the State of Alabama, and is a resident of the State of Mississippi, whose present address is S. S. Delmundo, in care of Delta Steamship Company, New Orleans, Louisiana.

2. Your Oratrix and the Respondent were lawfully married in Jackson County, Mississippi, on October 19, 1939, and lived together as man and wife until about December 19, 1939, when they separated. Your Oratrix has not lived with the Respondent since the date of the said separation.

3. The Respondent, Robert C. Creel, has become addicted, since his marriage to your Oratrix, to habitual drunkenness.

4. Your Oratrix' maiden name was Blanche A. Bryars.

PRAYER FOR PROCESS.

Your Oratrix prays that the Court will take jurisdiction of the cause made by this Bill of Complaint and will cause due and proper notice to be served upon the Respondent, Robert C. Creel, in conformity with the rules of this Honorable Court, and the laws of this State in such matters pertaining, making him a party respondent to the Bill of Complaint, and requiring him to plead, answer or demur to it within the time prescribed by law.

PRAYER FOR RELIEF.

Your Oratrix further prays that upon a final hearing of this cause your Honor will enter and grant unto her a Decree of Divorce dissolving the bonds of matrimony now existing between your Oratrix and the Respondent, will grant unto her the right to marry

again and to resume the use of her maiden name. If your Oratrix is mistaken in the relief prayed for, she further prays that the Court will grant unto her such other, further and general relief as she may be equitably entitled to the premises considered.

J. B. Blackburn
Solicitor for Complainant.

STATE OF ALABAMA

ESCAMBIA COUNTY

Before me, the undersigned authority, within and for said County in said State, personally appeared Blanche A. Bryars Creel, who, after being by me first duly and legally sworn, deposes and says That she is the Complainant named in the foregoing Bill of Complaint and that the allegations contained therein are true.

Blanche A. Bryars Creel

Sworn to and subscribed before me
on this the 22 day of June, 1940.

Pearl Keebler

Notary Public, Escambia County, Alabama.

BLANCHE A. BRYARS CREEL,
Complainant,
VS.
ROBERT C. CREEL,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER _____.

ANSWER

Now comes Robert C. Creel, the Respondent in the above en-
titled cause, and for answer to the Bill of Complaint filed therein says:

I, Robert C. Creel, being the identical person named in the
Bill of Complaint, do hereby accept service in the above matter, a copy
of the said Bill having been delivered to me, and hereby waive any and all
service which may be required or provided by the laws of the State of
Alabama.

I further waive any notice as to the taking of testimony in the
said cause, and Complainant may take testimony whenever she desires with-
out my being present.

I further agree that said cause may be submitted at any time
which suits the convenience of the Complainant without further notice to
me and that this Court may enter Decree in said cause at any time it is
submitted to it for such Decree, it being my intent to waive all of the
formal notices and requisites of the law as to submitting said cause, as to
answering said cause and as to taking the depositions of the witnesses in
said cause, but insist that the Complainant be required to prove the
material allegations of her Bill of Complaint.

I deny each and every allegation of the Bill of Complaint which
has not been hereinabove specifically answered and require that strict
proof be made of said allegations.

Robert C. Creel
Respondent

Witnesses:

James P. Creel
J. K. Day

REC-104

Miss
STATE OF LOUISIANA
Harrison County
PARISH OF ORLEANS

I, J. K. Day, a Notary Public, within and for said County in said State, hereby certify that Robert C. Greal, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal on this the 9th day of July, 1940.

J. K. Day
Notary Public, Orleans Parish, Louisiana.

Harrison County, Miss

Affix Seal.

11111

STATE OF ALABAMA
BALDWIN COUNTY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETING:

WE COMMAND YOU, That you summon Robert C. Creel to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 Blanche A. Bryars Creel against the said Robert C. Creel, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent 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, R. S. Duck, Register of said Circuit Court, this

24 day of June, 1940.

R. S. Duck

Register.

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

Your Oratrix, Blanche A. Bryars Creel, presents this Bill of Complaint against Robert C. Creel, and thereupon your Oratrix complains and shows unto your Honor as follows:

1. Your Oratrix is over twenty-one years of age and is a bona fide resident citizen of Baldwin County, Alabama, where she has resided for more than one year next preceding the filing of this Bill of Complaint. The Respondent, Robert C. Creel, is over twenty-one years of age and a non-resident of the State of Alabama, and is a resident of the State of Mississippi, whose present address is S. S. Delaundo, in care of Delta Steam Ship Company, New Orleans, Louisiana.

2. Your Oratrix and the Respondent were lawfully married in Jackson County, Mississippi, on October 19, 1939, and lived together as man and wife until about December 19, 1939, when they separated. Your Oratrix has not lived with the Respondent since the date of the said separation.

3. The Respondent, Robert C. Creel, has become addicted, since his marriage to your Oratrix, to habitual drunkenness.

4. Your Oratrix' maiden name was Blanche A. Bryars.

PRAYER FOR PROCESS.

Your Oratrix prays that the Court will take jurisdiction of the cause made by this Bill of Complaint and will cause due and proper notice to be served upon the Respondent, Robert C. Creel, in conformity with the rules of this Honorable Court, and the laws of this State in such matters pertaining, making him a party respondent to the Bill of Complaint, and requiring him to plead, answer or demur to it within the time prescribed by law.

PRAYER FOR RELIEF.

Your Oratrix further prays that upon a final hearing of this cause your Honor will enter and grant unto her a Decree of Divorce dissolving the bonds of matrimony now existing between your Oratrix and the Respondent, will grant unto her the right to marry

BLANCHE A. BRYARS CREEL,
Complainant,
VS.
ROBERT C. CREEL,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 645.

DECREE OF DIVORCE.

This cause coming on to be heard was submitted upon the Bill of Complaint, Answer of Respondent, Robert C. Creel, and the 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 her said Bill of Complaint and IT IS THEREFORE ORDERED, ADJUDGED AND DECREED as follows:

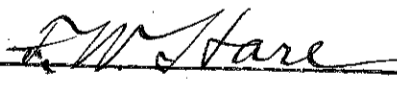
1. That the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved and the said Blanche A. Bryars Creel is forever divorced from the said Robert C. Creel.

2. It is further Ordered, Adjudged and Decreed by the Court that the said Blanche A. Bryars Creel be, and she is hereby permitted to resume the use of her maiden name of Blanche A. Bryars.

3. It is further Ordered, Adjudged and Decreed by the Court that the said Blanche A. Bryars be, and she is hereby permitted to again contract marriage, but shall not marry again except to the said Robert C. Creel until sixty days after this date, and if an appeal is taken within sixty days, she shall not marry again except to the said Robert C. Creel during the pendency of the said appeal.

4. The costs of this proceeding are hereby taxed against the Complainant, for which execution may issue.

Done on this the 23rd day of July, 1940.



Judge of the Circuit Court.

STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon WILLIAM STENZEL to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction within thirty days from the service of summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by LOVIE STENZEL against WILLIAM STENZEL, 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, R. S. DUCK, Register of said Circuit Court, this 2nd day of July, 1940.

R. S. Duck

Register.

again and to resume the use of her maiden name. If your Oratrix is mistaken in the relief prayed for, she further prays that the Court will grant unto her such other, further and general relief as she may be equitably entitled to the premises considered.

J. B. Blackburn
Solicitor for Complainant.

STATE OF ALABAMA

ESCAMBIA COUNTY

Before me, the undersigned authority, within and for said County in said State, personally appeared Blanche A. Bryars Creel, who, after being by me first duly and legally sworn, deposes and says: That she is the Complainant named in the foregoing Bill of Complaint and that the allegations contained therein are true.

Blanche A. Bryars Creel

Sworn to and subscribed before me
on this the 22 day of June, 1940.

MEMBER

AMERICAN

CHIEF OF

MEMBER

COMMISSIONER

MEMBER

COMMISSIONER

again and to resume the use of her maiden name. If your Order is taken in the relief prayed for, she further prays that the Court will grant unto her such other, further and general relief as she may be equitably entitled to the premises considered.

J. B. Blackburn
 Solicitor for Complainant.

STATE OF ALABAMA
 BALDWIN COUNTY

Before me, the undersigned authority, within and for said County in said State, personally appeared Blanche A. Bryars Creel, who, after being by me first duly and legally sworn, deposes and says: That she is the Complainant named in the foregoing Bill of Complaint and that the allegations contained therein are true.

Copy

SUMMONS AND COMPLAINT.

Complainant,
 BLANCHE A. BRYARS CREEL,

VS.

Respondent,
 ROBERT C. CREEL,
 Blanche A. Bryars Creel

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA.
 IN EQUITY.

NUMBER 645

Notary Public, Baldwin County, Alabama.
 Pearl Keeple
 Filed June 24, 1940
 R.S. DeLoach

Sworn and subscribed before me on this the 23rd day of June, 1940.

STATE OF MISSISSIPPI
Notary Public
JAMES O. GIBSON

and for said county in said State, hereby certify that Robert O. Owen,
whose name is signed to the foregoing instrument, and who is known to me,
acknowledged before me on this day that, being informed of the contents
of the instrument, he executed the same voluntarily on the day the same
bears date.
Given under my hand and official seal on this the _____ day of
July, 1940.

Notary Public, Orleans Parish, Louisiana.

James O. Gibson
July 10 1940
Robert O. Owen

With Seal.

ADP

RECORDED

ROBERT C. GREELY, Plaintiff

vs.

ROBERT C. GREELY, Defendant

IN THE CIRCUIT COURT OF

THE FIRST JUDICIAL CIRCUIT

IN AND FOR THE COUNTY OF ALABAMA

ALABAMA

Now comes Robert C. Greely, the Respondent in the above entitled cause, and for answer to the Bill of Complaint filed therein says: I, Robert C. Greely, being the identical person named in the Bill of Complaint, do hereby accept service in the above matter, a copy of the said Bill having been delivered to me, and hereby waive any and all service which may be required or provided by the laws of the State of Alabama.

I further waive any notice as to the taking of testimony in the said cause, and complainant may take testimony whenever and wherever with- out my being present.

I further agree that said cause may be admitted at any time which suits the convenience of the complainant without further notice to me and that this Court may enter Decree in said cause at any time it is admitted to it for such Decree, it being my intent to waive all of the formal notices and requisites of the law as to admitting said cause, as to answering said cause and as to taking the depositions of the witnesses in said cause, but in that the complainant be required to prove the material allegations of her Bill of Complaint.

I deny each and every allegation of the Bill of Complaint which has not been heretofore specifically answered and require that strict proof be made of said allegations.

Robert C. Greely
Respondent

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

[Signature]
[Signature]

646

RECORDED

BILL OF COMPLAINT

LOVIE STENZEL,

Complainant,

vs.

WILLIAM STENZEL,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed July 2, 1940
R. S. Pugh, Registrar*

*Presented this
the 2nd day of
July 1940 by
Securing a copy
of the within
Bill of Complaint
on William Stenzel*

*W. H. Stuart
Sheriff*

*Key
A. Pruitt
DS*

THE STATE OF ALABAMA
Baldwin County

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

BLANCHE A. BRYARS CREEL, COMPLAINANT

VS.

ROBERT C. CREEL, RESPONDENT

I, Ora S. Nelson

as ~~Register and~~ Commissioner

have called and caused to come before me Blanche A. Bryars Creel

witness— named in the Requirement for Oral Examination, on the 22nd day of July

19 40, at the office of J. B. Blackburn

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

the whole truth, and nothing but the truth, the said Blanche A. Bryars Creel

doth depose and say as follows:

My name is Blanche A. Bryars Creel. I am over twenty-one years of age and am a bona fide resident citizen of Baldwin County, Alabama, where I have resided for the past fourteen years. The Respondent, Robert C. Creel, is over twenty-one years of age and is a non-resident of the State of Alabama, whose place of residence being in the State of Mississippi and his present address is Steam Ship Delmundo, in care of Delta Steam Ship Company, New Orleans, Louisiana.

I was lawfully married to the Respondent, Robert C. Creel, in Jackson County, Mississippi, on October 9, 1939, and we lived together as man and wife until about December 19, 1939, when we separated. I have not lived with the Respondent since the date of the said separation, namely, December 19, 1939.

The Respondent, Robert C. Creel, has become addicted since our marriage, to habitual drunkenness. That is, after our marriage, it became a general custom or rule for him to be under the influence of liquor and during this period of time, that is, between the time we were married and the time we separated, he formed a fixed habit of frequently getting drunk and it was the general rule for him to be drunk.

My maiden name was Blanche A. Bryars.

Blanche Allison Bryars Creel
Blanche A. Bryars Creel

ORAL EXAMINATION

I, Ora S. Nelson, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition— on Oral Examination was taken down in writing by me in the words of the witness— and read over to her and she signed the same in the presence of myself and J. B. Blackburn

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 22nd day of July, 19 40.

Ora S. Nelson. (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Blanche A. Bryars Creel,

Complainant

Vs.

Robert C. Creel,

Respondent

ORAL DEPOSITION

Filed July 22, 1940

R. S. Dinch, Register

RECORDED IN

Record _____

Vol. _____ Page _____

Register _____

State of Alabama,)
Baldwin County.)

I, R. S. Duck, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that a copy of the within Bill of Complaint, together with copy of Summons was mailed to the Respondent, at the address given in the Bill of Complaint, by Registered mail, postage prepaid, with return receipt requested and marked "For Delivery only to the person to whom addressed".

This the 24th day of June, 1940.

R. S. Duck
R. S. DUCK, Register.

RECORDED

SUMMONS AND COMPLAINT.

BLANCHET A. BRYARS CREEEL,

Complainant,

VS.

ROBERT C. CREEEL,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 1645-

*Filed June 24, 1940
R. S. Duck, Register*

Recorded

DECREE OF DIVORCE.

BLANCHE A. BRYARS CREEL,

Complainant,

VS.

ROBERT C. CREEL,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER 645.

Filed July 24, 1940
R. S. Duck, Register

R. S. [unclear] CK
Register and Clerk Of The
Circuit Court, Baldwin County
Bay Minette, Ala.

REGISTERED MAIL.
RETURN RECEIPT REQUESTED.

JUL 13 1940

Deliver to addressee only.

Return Receipt Requested
Fee Paid

Special Delivery

ROBERT G. GREEN,
S. U. [unclear]
C/o Delta [unclear] Co.,

JUL 13 1940

Second Notice

REGISTERED
NO. 17

Special Delivery

RECEIVED
S. U. [unclear]
C/o Delta [unclear] Co.,
For better address?
Check for address?
The [unclear] office in state?

Market St [unclear]
7/10/40

DELIVER TO ADDRESSEE ONLY.

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this 22

day of July 1940

R. S. [unclear]
REGISTER

MOORE PRINTING CO., BAY MINETTE, ALA.

BLANCHE A. BRYARS CREEL,

Complainant,

vs.

ROBERT C. CREEL,

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 of the Respondent, Robert C. Creel and testimony of Blanche A.
Bryars Creel, taken before Ora S. Nelson, as Commissioner, at the
office of J. B. Blackburn, in Bay Minette, Alabama, on July 22, 1940.

and in behalf of Defendant upon _____ Answer

R. S. Duck

Register.

Post Office Department

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

OFFICIAL BUSINESS

POSTMARK OF DELIVERING OFFICE

REGISTERED ARTICLE

No. 17

INSURED PARCEL

No.

Return to R. S. DUCK, Registrar & Clerk Baldwin County

(NAME OF SENDER)

Street and Number or Post Office Box

Post Office at W. McNEELLY, ALABAMA

State

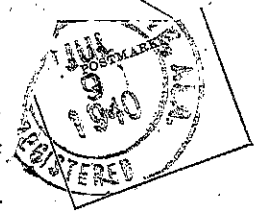
RECEIPT FOR REGISTERED ARTICLE No.

15 fee paid, 1 class postage paid, 7-9, 1930

Declared value, \$ Surcharge paid, \$ (Date)

From R. S. Duck (Sender)

Addressed to (Address)



Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee in person or order Special delivery fee

Delivery restricted to addressee Fee paid 10 Postmaster, per 6

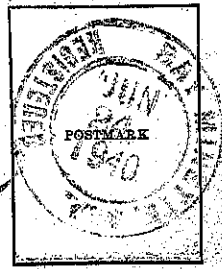
RECEIPT FOR REGISTERED ARTICLE No. 763

15 fee paid, 1 class postage paid, 6-24, 1930

Declared value, \$ Surcharge paid, \$ (Date)

From R. S. Duck (Sender)

Addressed to (Address)



Accepting employee will place initials in space below, indicating restricted delivery

Return receipt fee in person or order Special delivery fee

Delivery restricted to addressee Fee paid 10 Postmaster, per 6

THE UNIVERSITY OF CHICAGO

CHICAGO, ILLINOIS

*Received from the Treasurer of the University of Chicago, Illinois, the original
of a check payable to the sum of \$100.00*

.....
SIGNED AND DELIVERED BY

.....
Treasurer of the University of Chicago

.....
Signed and delivered in presence of