

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this 14th

day of October 1911

R. S. Duck

REGISTER

STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon VIRGIL ROBERTS 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 BEULAH ROBERTS against VIRGIL ROBERTS, 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 12th day of September, 1941.

R. S. Duck
Register.

BEULAH ROBERTS, Complainant,)	IN THE CIRCUIT COURT OF
VS.)	BALDWIN COUNTY, ALABAMA,
VIRGIL ROBERTS, Respondent.)	IN EQUITY.

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

Now comes the Complainant, BEULAH ROBERTS and humbly complaining against the Respondent, VIRGIL ROBERTS, respectfully represents and shows unto your Honor and this Honorable Court, as follows:

1.

That your Complainant is over twenty-one years of age and a resident of Baldwin County, Alabama; That the Respondent is over twenty-one years of age and a resident of Mobile County, Alabama;

2.

That your Complainant and the Respondent were married at Pascagoula, Mississippi, on to-wit, September 15, 1937, and separated on September 15, 1937;

3.

That on, to-wit, September 15, 1937, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.

Therefore the premises considered, the Complainant prays that your Honor will by proper process make the said Respondent, VIRGIL ROBERTS, party

respondent to this Bill of Complaint, requiring him to plead, answer, or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

The Complainant further prays that upon a final hearing of this cause your Honor will make and enter a decree awarding to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that your Honor will give and grant unto her such other, further, different, and general relief as she may be in equity and good conscience entitled to receive and as in duty bound she will ever pray.

Beale + Hare
Solicitor for Complainant.

THE STATE OF ALABAMA,
Baldwin County

}

CIRCUIT COURT

TO FRANCIS CHANNERY

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

BUTLAIN ROBERTS and VIRGIL ROBERTS

as witnesses in behalf of BUTLAIN ROBERTS in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

BUTLAIN ROBERTS

Complainant

and

VIRGIL ROBERTS

Defendant,

on oath to be by you administered, upon to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 28th day of October, 1961

R. D. ...
REGISTER

Commissioner's Fee \$

Witness' Fees, \$

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BUELAH ROBERTS

Complainant

VS

VIRGIL ROBERTS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decress Pro Confesso on Personal Service 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 Buelah Roberts

is forever divorced from the said

Virgil Roberts

for and on account of voluntary abandonment

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 Buelah Roberts, the Complainant be, and she is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Buelah Roberts, the Complainant ~~they~~ pay the cost herein to be taxed, for which execution may issue.

This 27th day of October, 19 41.

J. M. Hare

Judge Circuit Court, in Equity.

I, _____, Register of the Circuit Court of 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.

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The State Of Alabama

Baldwin County

In Circuit Court, In Equity

DUELAIN ROBERTS
vs. Complainant.

VIRGIL ROBERTS
Respondent.

DIVORCE DECREE

Filed Oct. 28th. 1941

R. S. Grick
Registrar

BEYBE & HALL,
LAWYERS
Bay Minette,
Alabama

The State of Alabama Baldwin County

Circuit Court in Equity

[Faint, illegible text from the reverse side of the document]

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NO.

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

BUALAH ROBERTS

Complainant

VS.

VERGIL ROBERTS

Defendant

Commission To Take Deposition

COMMISSIONER:

Witnesses:

BEULAH ROBERTS,

Complainant,

VS.

VIRGIL ROBERTS,

Respondent.

SUBMONS AND
COMPLAINT

Filed September 12, 1941
R. S. Duck, Register

BEEBE & HALL
LAWYERS
BAY MINETTE, ALABAMA

RECORDED

EXECUTED
This the 26 day of Sept 1941.
By leaving a copy with
Virgil Roberts
W. R. Kennedy Sheriff
Bay Minette, Ala.

Received in office this the 23 day
of *Sept*, 1941.
By *W. R. Kennedy* Sheriff
D. S.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194__

BURLAY ROBERTS

Complainant—

VS.

VIRGIL ROBERTS

Respondent—

TO R. S. DUCK, REGISTER:

In the above stated cause a Decree pro confesso on Personal Service
having been filed against _____ the Respondent—,
and evidence having been taken, and the cause being ready for submission for final decree, and
no defense having been interposed, the complainant—, by Beebe & Hall,
Solicitor^S 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.

Beebe & Hall

Solicitor^S for Complainant—

The State of Alabama, }
BALDWIN COUNTY.

No. _____ CIRCUIT COURT IN EQUITY.

BUELAH ROBERTS

Complainant

vs.

VIRGIL ROBERTS

Defendant

Motion is hereby made for a Decree Pro Confesso against

VIRGIL ROBERTS

Defendant

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

This 27th day of October 1924

Buelah Roberts

Solicitor.

BUELAH ROBERTS

VS.

VIRGIL ROBERTS

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, _____
Motion for Decree Pro Confesso on Personal Service, Decree
Pro Confesso on Personal Service, Request for Decree in
Vacation, and Testimony of Buelah Roberts and Gertrude
Dvorak, Affidavit that the Respondent is not in the Military or Naval
Services of the United States.

and in behalf of Defendant upon _____

R. Duval
Register.

No.

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RECORDED

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

WILLIAM ROBERTS

VS.

VIRGIE ROBERTS

NOTE OF TESTIMONY

Filed in Open Court this 78th
day of Oct 1951

[Handwritten Signature]

REGISTER

No. 7 BE

Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

BUELAH ROBERTS

Vs.

VIRGIL ROBERTS

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed Oct 27 1941

Re Dues
Register.

Recorded in Record,

Vol. Page

Register.

NO. 75

EVELAN ROBERTS

Complainant—

VS.

VIRGIL ROBERTS

Respondent—

Request For Decree In Vacation

Filed Oct 78th, 1941

Register.

state of Alabama)

Baldwin County)

Before me, the Undersigned Authority, in and for said County, in said State, personally appeared Beulah Roberts, who is known to me, and who having been by me first duly sworn, deposes and says that she is personally acquainted with Virgil Roberts, the Respondent in the cause now pending in the Circuit Court of Baldwin County, Alabama, in Equity, styled Beulah Roberts vs Virgil Roberts; that the said Virgil Roberts is now now, and was not at the time this suit was filed in the Naval or Military service of the United States.

Beulah Roberts

Sworn to and subscribed before me this the 25 day of October, 1941.

W. H. H. H.
Notary Public, Baldwin Co., Ala.

BUELLAI ROBERTS
 Complainant,
 Vs.
VIRGIL ROBERTS
 Respondent.

In the Circuit Court.
 In Equity No. _____

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____

VIRGIL ROBERTS

by the Sheriff of DALLAS County, on the 26th day of September, 1941.

And it further appears to the Register, that the said _____

VIRGIL ROBERTS

_____, the Respondent—, having to the date hereof, failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore, on motion of BEZBE & HALL Solicitors for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be, and it hereby is, in all things taken as confessed against the said _____

VIRGIL ROBERTS

This 27th day of October, 1941.

Res. Luck

Register.

No. _____

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

HUMPHRY ROBERTS

Complainant,

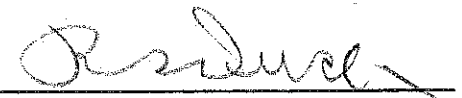
Vs.

VERGIL ROBERTS

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 27 day of Oct,
1941.


Register.

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Benloch Roberts

to

Virgie Roberts

Affidavit

Filed Oct 28. 1941

R. D. Dyer
Register

THE STATE OF ALABAMA }
Baldwin County }

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

BEULAH ROBERTS COMPLAINANT

vs.

VERONIC ROBERTS RESPONDENT

I, FRANCIS BRANTLEY

~~as Register and Commissioner~~

have called and caused to come before me

BEULAH ROBERTS and VERONIC DVORAK

witnesses named in the requirement for Oral Examination, on the 27th day of October

1941, at the office of BEED & MALL

in Bay Minette, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said

BEULAH ROBERTS doth depose and say as follows:

My name is Beulah Roberts. I live at Silverhill in Baldwin County, Alabama, and am over twenty-one years of age.

The Respondent is over twenty-one years of age and a resident of Mobile, Mobile County, Alabama, but is at present staying in Dallas County, Alabama.

The Respondent and I were married at Pascagoula, Mississippi, on September 15th, 1937. We separated the same day. In fact, we never did live together as man and wife. The Respondent on the same day we were married left me voluntarily, and has remained away voluntarily and continuously since that time. He has contributed nothing toward my support and maintenance. I gave the Respondent no occasion for leaving me. I know that we can never live together as man and wife. We have no children. I have lived in Baldwin County, Alabama during the past three years.

Beulah Roberts

I am a resident of Baldwin County, Alabama. I am personally acquainted with the Complainant Beulah Roberts. She has been living with me during the past three years. I know of my own personal knowledge that she and the Respondent have not lived together as man and wife, and I further know that during that time he has contributed nothing toward her support. The Complainant has had to work for herself. I further know that during the time that the Complainant has lived with me that the Respondent has not visited her.

Lucretia Dvorak

I, FRANCIS B. BENTLEY 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 es and read over to them and they signed the same in the presence of myself and H. N. HALL

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; 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 28th day of October, 1941.

Francis Bentley (L. S.)

No. 765 Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

STEPHEN RODRIGUES

COMPLAINANT

vs.

YERGETT RODRIGUES

RESPONDENT

ORAL DEPOSITION

Filed Oct 28, 1941

Francis Bentley, Register.

RECORDED IN

Record

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Register