BERTHA ENGLISH

Complainant

-vs-

SEYMOUR ENGLISH

Respondent

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

Comes your Complainant, Bertah English, and exhibits this, her Bill of Complaint for divorce against Seymour English and shows unto your Honor and this Court as follows:-

FIRST:

That your Complainant is over the age of twenty-one years and is a bona fide resident of the State of Alabama, having therein resided for more than twenty years; her present address being Summerdale, Alabama; that the Respondent is a non-resident whose address is 1311 Liberty Street, Hopkinsville, Kentucky.

SECOND:

That your Complainant and the Respondent were married on, here-tofore, to-wit, July 7th, 1907, and lived together as man and wife until August 13, 1939 when because of the matters and facts herein-after complained of, your Complainant was compelled to live separate and apart from the Respondent; that your Complainant has received no support from the Respondent for over twenty years, and that she has maintained the household entirely out of her income; that for a period of over five years the Respondent spent most of his time apart from your Complainant and that on August 13, 1939, he abandoned your Complainant, stating that he did not intend to return.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, your Complainant prays that Seymour English be made a party defendant to this cause by the usual process of this Honorable Court requiring him to plead, answer, or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided;



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Respondent

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THE STATE OF ALABAMA Baldwin County

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

Be	erthe English		COMPLAINANT	
•	-	VS.		
S	eymour English		RESPONDENT	
I,	<u> Jettie Terrell</u>			
as Register and Co	mmissioner			<u> </u>
	ed to come before me			
Dorothy E	. Underwood,			
	·-			
	/			
•	the Requirement for Ora		20th day of	June
19 ⁴² , at the office	e of Hybart, Chas	on & Chason		
in Foley,	, Alabama, and l	having first sworn sai	id witness— to spea	ak the truth,
the whole truth, and	nothing but the truth, th	ne said Bertha	English and	
Dorothy E, Un	derwood dot	h depose and say as f	ollows:	≪

My name is Bertha English, and I am 50 wears old and a resident of Baldwin County, Alabama, having resided therein for 37 years. I married Seymour English on July 7, 1907, and we lived together as map and wife until August 13th, 1939, though he was gone a good part of the time for the last five or six years. I have worked and supported myself and our children for over twenty years with no help from my husband. The children are now all grown and are self supporting.

For about five or six years, Seymour would only come home at intervals, staying away and out of town most of the time, and on August 13th, 1939, he left, stating that he was going to Umatilla, Fla., and that he did not want me to go with him, and that he did not intend to return. He has not returned since that time.

Bertha Eiglich.

My name is Dorothy Underwood, I am 32 years of age and a resident of Baldwin County, Alabama. My mother and father, Bertha English and Seymour English, were married on July 7th, 1907, and I was born in 1999. From the time I was big enought to remember, my mother worked and supported herself and the children. For about the last five or six years, my father has lived and worked away from my mother, and we would only see him occasionally. On August 13th, 1939, he left and said that he wasn't coming back. My mother did not know where he had gone for several weeks. She would have gone with him at this time, even if he had left her before, if he would have let her, but she didn't even have a chance, and he wouldn't take her with him.

Dorathy E. Underwood

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CIRCIII	Baldwin	STATE (NC.
CIRCIIIT COLIBT	Baldwin County	STATE OF ALABAMA	
		A	

Bertha English

Complainant.

Seymour English

Commission To Take Deposition

COMMISSIONER:

Witnesses:

No
The State of Alabama,
IN EQUITY CIRCUIT COURT OF BALDWIN COUNTY
*
Vs.
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NOTE OF TESTIMONY
Filed in Open Court this 242
day of
Register.

Moore Printing Co.

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Ber	tha	Engli	sh,					

Complainant.....

VS.

Seymour English

Request For Decree In Vacation

Respondent___,

Register.

I,Jettie Terrell, 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 them and they signed the same in the presence
of myself and each other
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 23rd day of June , 19 42
Jettie Jenell (L. S.)

No.————————————————————————————————————	THE STATE OF ALABAMA Baldwin County	IN CIRCUIT COURT, IN EQUITY	Bertha English	Complainant Vs.	Seymour English	Respondent	ORAL DEPOSITION	Filed Filed 19442	RECORDED IN	Vol Record	Register
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(page two)

that upon a final hearing of this cause that your Complainant be granted a divorce from the said Respondent; and that your Complainant be given the right to remarry. Should your Complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled, and as in duty bound she will ever pray.

Sold citors for Complainant.