

STATE OF ALABAMA, }
BALDWIN COUNTY. }

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.

IN EQUITY.

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA-----In Equity.

Your Oratrix, Lenora Rogers, respectfully represents
and shows unto Your Honor as follows:

FIRST:

That she is a resident of Baldwin County, Alabama,
residing at Bay Minette, and has resided in Bay Minette, Ala-
bama for a period of more than three years next preceeding
the filing of this bill, and that she is over the age of
twenty-one years.

SECOND :

That Grady T. Rogers is over the age of twenty-
one years and his place of residence is unknown; that she
has exercised reasonable dillgence and effort to obtain
the residence of the said Grady T. Rogers.

THIRD:

That your Oratrix and the said Grady T. Rogers were
lawfully married during the year 1919 and lived together as
man and wife until the month of May 1927, at which time the
said Grady T. Rogers voluntarily abandoned your Oratrix with-
out fault on her part and that the said act of abandonment
was comitted while your Oratrix and the said Grady T. Rogers
were living in

The premises considered your Oratrix prays that the
said Grady T. Rogers be made party respondent to this bill
of complaint by the usual process of this Honorable Court;
that such orders, decrees and publications be made on the said
Grady T. Rogers as necessary to perfect service on him,

and that he be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF:

That upon the final hearing of this cause Your Honor will grant unto your Iatrix an absolute divorce.

That if your Oratrix is mistaken in the relief prayed for then Your Honor will grant unto her such other, further, different and general relief as Oratrix may in justice and equity be entitled, she will ever pray, etc.

Henry D. Moorer
Henry D. Moorer, Atty for Respondent.

FOOT NOTE: The Defenant is required to answer each and every allegation contained in the foregoing bill, paragraph numbered one to three, inclusive, but not under oath, answer under oath being hereby expressly waived.

Henry D. Moorer
Henry D. Moorer.
Atty for Respondent.

State of Alabama,
Baldwin County.

Before me, T. W. Richerson, Clerk of the Circuit Court, Baldwin County, Alabama, personally appeared Lenora Rogers who being by me first duly and legally sworn doth depose and say: That the allegations contained in the foregoing bill are true and correct, and that the place of residence of Grady T. Rogers is unknown and that affiant have made reasonable effort and exercised reasonable diligence to locate the place of residence of the said Grady T. Rogers.

Lenora Rogers

Sworn and subscribed to before me on this
9th day of ~~December~~ 1931.

T. W. Richerson
Clerk of the Circuit Court,
Baldwin County, Alabama.

TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

Lenora Rogers

No.

vs.

Grady T. Rogers

The State of Alabama,

Baldwin County.

Circuit Court, in Equity.

This the 9th day of

December, 1921

In this cause it being made to appear to the Clerk of this Court by the affidavit of

Lenora Rogers

that the Defendant Grady T. Rogers

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Grady T. Rogers

to answer or demur to the Bill of Complaint in this cause by the 9th day of January 1922, or after thirty days therefrom a decree Pro Confesso may be taken against

The bond dept

T. P. Kiehlman

Register.

*H. D. Moore
Atty for Complainant*

The State of Alabama }
Baldwin County

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

Lenora Rogers

COMPLAINANT

VS.

Grady T. Rogers

RESPONDENT

I, W. A. Stone

^{as} Register and Commissioner

have called and caused to come before me Lenora Rogers and
Mrs. Julia M. King

witness named in the requirement for Oral Examination, on the 26 day of Oct.
1933, at the office of N. D. Moore

in Bay Minette, Alabama, and having first sworn said witness to speak the
truth, the whole truth, and nothing but the truth, the said Lenora Rogers
and Julia M. King doth depose and say as follows:

Testimony of Lenora Rogers:

My name is Lenore Rogers. I am over 21 years of age and live in Bay Minette, Alabama, with my Mother. I have lived in Bay Minette for more than the past three years immediately before the filing of this bill of complaint. Grady T. Rogers is my husband. We were married during the year 1919 and lived together as man and wife until May 1927 at which time the said Grady T. Rogers voluntarily abandoned me and has not lived with me since. I have not heard from since he abandoned me in the year 1927 and I have visited his mother and brother and they have not heard from him since. Grady T. Rogers abandoned me without fault on my part.. Grady T. Rogers is over 21 years of age and his place of residence is unknown and cannot be ascertained after reasonable effort. I have asked all of his people about his residence and none of them know. They have not heard from him since he left me. W

Lenore Rogers

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To W. A. Stone

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

Senora Rogers and Mrs.
Julia M. King

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

Complainant

and Grady J. Rogers

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 25 day of Oct. 1922

W. A. Stone
REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

ORAL EXAMINATION

I, W. A. Stone 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 W. D. Moore 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 26 day of Oct. 1933

W. A. Stone (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Geneva Rogers
COMPLAINANT

VS.

Madley J. Rogers
RESPONDENT

ORAL DEPOSITION

Filed Oct. 26, 1933

W. A. Stone, Register.

RECORDED IN

_____ Record

Vol. _____ Page _____

_____, Register

The State of Alabama }
Baldwin County

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

Lenora Rogers

COMPLAINANT

VS.

Grady T. Rogers

RESPONDENT

I, W. A. Stone

as ~~Register~~ ^{or} and Commissioner

have called and caused to come before me: Lenora Rogers and
Mrs. Julia M. King

witness named in the requirement for Oral Examination, on the 26 day of Oct.
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Lenore Rogers

Published Every Thursday

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

R. B. Vail
Editor and Proprietor

BAY MINETTE, ALA.

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail, being duly sworn, deposes and says that he is
the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay
Minette, Baldwin County, Alabama; that the notice hereto attached of

Lenora Rogers

vs

Grady Rogers

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<i>December 10 1931</i>	Vol. <i>42</i>	No. <i>45</i>
Date of second publication	<i>December 17 1931</i>	Vol. <i>42</i>	No. <i>46</i>
Date of third publication	<i>December 24 1931</i>	Vol. <i>42</i>	No. <i>47</i>
Date of fourth publication	<i>December 31 1931</i>	Vol. <i>42</i>	No. <i>48</i>

Subscribed and sworn before the undersigned this 12 day of

January 2 1932
Not Public
Clerk Circuit Court.

R. B. Vail
Publisher

NOTICE TO NON-RESIDENT
The State of Alabama, Baldwin County, Circuit Court, in Equity. This the 9th day of December, 1931.
LENORA ROGERS, VS. GRADY T. ROGERS.
In this cause it being made to appear to the Clerk of this Court by the affidavit of Lenora Rogers that the Defendant Grady T. Rogers is a non-resident of the State of Alabama...

HEARD MAKING
GOOD AT MINNETTE

BAY MINETTE, ALA.

12/1/21

M T.W. Richardson

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12/1/0. Non Res Notice Lenora vs Lady Rogers
4 times - 173 1/2 x 4 1/2

779

