(903)

Edna Hall,

Complainant,

٧s

Leslie Hall,

Respondent

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

IN EQUITY

And now comes the Respondent in his own proper person, and denies each and avery allegation contained in the Complainant's bill of complaint and demands strict proof of the same.

The Respondent waives notive of the time of taking testimony on behalf of the the Complainant, the right to cross examine the witnesses, and agrees that this cause be submitted forthwith, without further notice.

Leslie Hall
Respondent

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		:	**************************************		EDNA HALL	:		, Complainant
			:		Vs.			———, Compiamant
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	:	:	; ;	LESLIE HALL	· \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		, Defendant
То	R	. s.	Duck		, R	egister		

The State Of Alabama Baldwin County

Circuit Court of Baldwin County, In Equity.

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	MAND YOU, That yo	u summon—	LESLI	E HALL			
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	Baldwin	County,	to be and	appear l	gefore the	Judge of	f the Circ
urt of Baldy	vin County, exercising	Chancery ju	irisdiction,	within 1	thirty day	s after th	ne service
	there to answer, plead	-					
ŕ	EDNA HALL	·			•		v
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inst said —	LESLIE HALL				-		•
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N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Complainant,

IN THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA.

LESLIE HALL,

Respondent

IN EQUITY

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

Your Complainant Edna Hall, humbly complaining against the Respondent, Leslie Hall, respectfully represents and shows unto your Honor and this Honorable court, as follows:

1

That you Complainant and the Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age.

2

Thay your Complainant and the Respondent were married at Stockton, in Baldwin County, Alabama, on February 27th, 1916; that they lived together as man and wife in Baldwin County, Alabama, until on to-wit: January 1st, 1937.

3

That on to-wit: January 1st, 1937 the Respondent voluntarily abandoned the Complainant and has remained away, voluntarily since that time.

WHEREFORE the premises considered the Complainant prays that Your Honor will by proper process make the said Leslie Hall, party respondent to this bill of complaint, requiring him to plead, answer, or demue to the same within the time and under the penalties prescribed by law and the practive of this Honorable Court.

COMPLAINANT further prays that upon a final hearing

hereof your Honor will give and grant to her a decree of absolute divorce forewer barring the bonds of matrimony existing between her and the respondent; that your Honor will give and grant to her such other, further, different of general relief, as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray, ets

BEEBE & HALL,

By Dus Jall

Solicitors for the Complainant.

- Register.

EDNA HALL, COMPLAINANT	THE STATE OF ALABAMA, BALDWIN COUNTY
VS. LESLIE HALL, RESPONDENT	IN EQUITY CIRCUIT COURT OF BALDWIN COUNTY
This cause is submitted in behalf of	Complainant upon the original Bill of Complaint, and waiver against the defendant and depositions
	a Hall and Elmina Bryars
and in behalf of Defendant upon	
	Register.

THE	STATE OF ALABAMA,	
1+ 1-1-1	Baldwin County	

Witness' Fees, \$_

CIRCUIT COURT

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* KNOW YE: That we, ha	ving full faith in your i	orudence ar	id competenc	v. have apr	ointed you Commis
sioner, and by these presents		* * *		- :	· · · · · · · · · · · · · · · · · · ·
you and examine E	DNA HALL and ELMIN	A BRYARS	· · · · · · · · · · · · · · · · · · ·	-	· · · · · · · · · · · · · · · · · · ·
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as witnesses in behalf of	ina Hall, complain	ant	j	in a cause pe	ending in our Circui
Court of Baldwin County, of sa	aid State, wherein —				
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	EDNA HAI	<u>.</u>			Complainant_
and —————					
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	TEOLIE E	اللها.	· · · · · · · · · · · · · · · · · · ·		——— Defendant
on oath to be by you administ	ered, upon				
to take and certify the depositi	on_ s of the witness₅	s and re	turn the san	ne to our C	Court, with all Con
venient speed, under your hand					
Witness	day of tel	, —	\rightarrow	1943	
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Commissioner's Fee \$,			·

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The S	tate of Alabama,
	Baldwin County
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THE STATE OF ALABAMA Baldwin County

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

	EDNA HALL	COMPLAINANT
		VS.
	LESLIE HALL	RESPONDENT
I,	Lauda Corwin	
as Register	and Commissioner	
have c alled	and caused to come before me	Edna Hall and Elmina Bryars
·		
witness_ e s	•	l Examination, on the day of
19, at	the office of BEEBE &	HALL
in Bay Mi	inette. Ala, Alabama, and	having first sworn said witness—to speak the truth,
the whole t	truth, and nothing but the truth, th	ne said <u>EDNAHALL</u>
	dot	h depose and say as follows:

My name is Edna Hall. I am a resident of Baldwin County, Alabama and over 21 years of age.

The respondent, Leslie Hall is over 21 years of age and a resident of Baldwin County, Alabama.

The respondent and I were married at Stockton, Alabama on February 27, 1916. We lived together as husband and wife in Baldwin County, Alabama until January 1, 1937. On January 1, 1937 the respondent voluntarily abandoned me, and remained away voluntarily and continously since that time. We have not lived together, as husband and wife since January 1, 1937, and I amd now fully convinced that we will never be able to live together again as husband and wife.

Edna Hall

Elmina Bryars, a witness for the complainant being first duly sworn testified as follows: My name is Elmina Bryars. I live at Bay Minette, in Baldwin County, Alabama. I am personally acquainted with the complainant and the respondent in the above styled cause. I know of my own personal knowledge that the complainant and respondent have not lived together as husband and wife since January 1, 1937. I also know that the complainant gave the respondent no cause for abandoning her. I know from my own personal observation that the complainant and respondent will not again live together as husband and wife.

Elmina Bryans

I, Lauda Corwin, 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 esand read over to them and they signed the same in the presence
of myselfLauda Corwin: H. W. Hall, attorney for complainant
at the time and place herein mentioned; that I have personal knowledge of personal identity of
said witnesses or had proof made before me of the identity of said witnesses, 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, thisday of, 19,
Landa Corwin (L. S.)

No. 923 Page	THE STATE OF ALABAMA Baldwin County	IN CIRCUIT COURT, IN EQUITY	Complainant Vs.	Respondent	ORAL DEPOSITION	Filed 2 19 35	RECORDED IN	VolPage	