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The State of Alabama }
Baldwin County

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

Ruth W. Keith, COMPLAINANT

vs.

J. E. Keith, Jr., RESPONDENT

I, M. A. Stone,

as Register and Commissioner

have called and caused to come before me Ruth W. Keith,

witness named in the Requirement for Oral Examination, on the 26th day of January,

1934, at the office of M. A. Stone,

in Baldwin, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Ruth W. Keith

doth depose and say as follows:

TESTIMONY OF RUTH W. KEITH.

I am the complainant in the above cause, I am over twenty-one years of age and a bona fide resident of Baldwin County, Alabama, where I have resided since just prior to October 16, 1931. The defendant, J. E. Keith, Jr., is over twenty-one years of age and resides in Baldwin County, Alabama.

I was lawfully married to J. E. Keith, Jr., in Bay Minette, Alabama, on October 16, 1931, and lived with him as his wife at Magnolia Springs in Baldwin County, Alabama, until about December 5, 1933, when I left him.

Just prior to the separation and while we were living at Magnolia Springs, in Baldwin County, Alabama, the said J. E. Keith, Jr., became angry with me and lost his temper, all of which was without fault on my part. After he became angry with me he proceeded to beat me with his fist, striking me several times about my face and head, blacking both of my eyes and otherwise injuring me. At that time and while he was angry with me he also threatened to kill me. Because of these said actions and the threats made by the said J. E. Keith, Jr., I was put in fear of being severely injured or done great bodily harm if I tried to continue to live with him. I have read over the bill of complaint and the allegations contained therein are true.

My maiden name was Ruth Woodcock.

Ruth W. Keith

M. A. Stone

ORAL EXAMINATION

I, M. 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 her and she signed the same in the presence of myself & W. A. Stone

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 26th day of January 19 34.

M. A. Stone (L. S.)

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The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Ruth W. Keith,

COMPLAINANT

vs.

J. E. Keith, Jr.,

RESPONDENT

ORAL DEPOSITION

Filed January 26, 19 34.

M. A. Stone, Register

RECORDED IN

Record

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Register

RUTH W. KEITH,
Complainant,
VS.
J. E. KEITH, Jr.,
Respondent.



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

DECREE OF DIVORCE.

This cause coming on to be heard was submitted upon the Bill of Complaint, Decree 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 her said bill.

It is, therefore, Ordered, Adjudged and Decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Respondent be, and the same are hereby dissolved and the said Ruth W. Keith is forever divorced from the said J. E. Keith, Jr., for and on account of the cruelty committed upon her as alleged in said Bill of Complaint.

It is further ordered, adjudged and decreed by the Court that the said Ruth W. Keith be, and she is hereby permitted to resume the use of her maiden name of Ruth Woodcock.

It is further Ordered that the said Ruth Woodcock be, and she is hereby permitted to again contract marriage but shall not again marry except to the said J. E. Keith, Jr., until sixty days after this date, and if an appeal is taken within sixty days, she shall not marry again except to the said J. E. Keith, Jr., during the pendency of said appeal.

Done at Bay Minette, Alabama, on this the ^{29th}~~27th~~ day of January, 1934.

F. W. Hare

Judge of the Circuit Court.

0111694

DEGREE OF DIVORCE

FRANK W. KATHN;
Complainant;

VS.

J. H. KATHN, JR.,
Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

JAN EQUITY

Dated this 21st day of January,
1954.

J. H. Kathn, Jr.
Respondent

J. B. BLACKBURN

ATTORNEY AT LAW
BALDWIN COUNTY, ALABAMA

11

RUTH W. KEITH,
Complainant,
VS.
J. E. KEITH, JR.,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____.

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE.

Motion is hereby made for a Decree Pro Confesso against J. E. Keith, Jr., the Respondent in the above entitled cause, on the ground that more than thirty days have elapsed since the said Respondent accepted service of a summons in said cause according to law, and that the said Respondent has failed to plead, answer or demur to the Bill of Complaint in the said cause to this date.

Dated this the 23rd day of January, 1934.

B. Blackburn
Solicitor for Complainant.

RUTH W. KEITH,
Complainant,
VS.
J. E. KEITH, JR.,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

DECREE PRO CONFESSO, ON PERSONAL SERVICE.

In this cause, it being made to appear to the Register that the Respondent accepted service of a summons in said cause, requiring him to appear and plead, answer or demur, to the Bill of Complaint in this cause, within thirty days from the service of said summons, and the said Respondent having failed to plead, answer or demur to the said Bill to the date hereof: It is now therefore, on motion of Complainant, ordered and decreed, that the said Bill of Complaint in this cause be, and it hereby is, in all things, taken as confessed against the said J. E. Keith, Jr., Respondent aforesaid.

Witness my hand, this 23rd day of January, 1934.

M. A. Stone

Register in Chancery.

The State of Alabama, { Circuit Court of Baldwin County, In Equity.
Baldwin County.

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon J. E. Keith Jr.,

of Baldwin County County, to be and appear before the Judge of the Circuit Court of Baldwin County, 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 Ruth W. Keith

against said J. E. Keith, Jr.,

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, M. A. Stone, Register of said Circuit Court, this 8th day of December 1933

M. A. Stone Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

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

Your Oratrix, Ruth W. Keith, brings this bill of complaint against J. E. Keith, Jr., and thereupon your Oratrix complains and shows unto the Court as follows:

1. Your Oratrix is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama, and the said J. E. Keith, Jr., is over twenty-one years of age and a resident of Baldwin County, Alabama.

2. Your Oratrix and the said J. E. Keith, Jr., were lawfully married at Bay Minette, in Baldwin County, Alabama, on to-wit, October 16, 1931, and lived together as man and wife at Magnolia Springs, Alabama, until about December 5th, 1933, when they separated.

3. Your Oratrix further shows unto the Court and your Honor that on to-wit, December 5th, 1933, the said J. E. Keith, Jr., became angry with her and then and there proceeded to and did beat her severely about the head and face, blacking both eyes and otherwise injuring her, at which time he also threatened to kill her, and because of said acts and threats your Oratrix was put in fear of being done great bodily harm if she tried to continue living with the said J. E. Keith, Jr.

PRAYER FOR PROCESS.

Your Oratrix prays that the said J. E. Keith, Jr., be made a party respondent to this Bill of Complaint and that the usual process of this Honorable Court do forthwith issue to him.

PRAYER FOR RELIEF.

Your Oratrix prays that the Court will enter and grant unto her a decree of divorce dissolving the bonds of matrimony now existing between her and the said J. E. Keith, Jr., and

will grant unto her the right to marry again and the right to resume the use of her maiden name. Your Oratrix further prays for such other, further and general relief as she may be equitably entitled to the premises considered.

J. B. Blackburn
Solicitor for Complainant.

FOOT NOTE: The said J. E. Keith, Jr., is required to answer each and every paragraph of the foregoing Bill of Complaint numbered 1 to 3 both inclusive but not under oath, his oath thereto being hereby expressly waived.

J. B. Blackburn
Solicitor for Complainant.

Dec 11 1933

SERVE ON ~~DAVID~~ *DAVID* E. Keith, Jr.,

Circuit Court of Baldwin County
IN EQUITY

No. 11

SUMMONS

Ruth W. Keith

vs.

J. E. Keith, Jr.,

Margaret Springs, etc

Solicitor for Complainant

Recorded in Vol. _____ Page _____

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THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this _____

day of _____ 193__

SHERIFF

Executed this _____ day of _____

193__

by leaving a copy of the within Summons with

Defendant

Sheriff

By _____
Deputy Sheriff

*Service accepted
this the 22nd day of
December, 1933.*

J. E. Keith, Jr.

Witness: [Signature]

ALABAMA

BILL OF COMPLAINT

ROBERT W. KEITH,
Complainant,

vs.

J. H. KENNEDY, JR.,
Respondent.

TEN THIRTEEN CROCKETT COURT, OFF

BARBUDAN COUNTY, ALABAMA.

TEN EQUINE NO. 11

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Filed Mar 5th 1993
W. O. Stone
W. O. Stone

J. B. BLACKBURN,
Attorney at Law,
BIRMINGHAM, ALABAMA.