

Complainant every reasonable apprehension to believe, and she does actually believe, that if she continued to live with him, he would carry out his threats and do further violence to her person which would necessarily endanger her life and health.

PRAYER FOR PROCESS.

Wherefore, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Tom Long 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.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent, and 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.

BEEBE & HALL

BY *Handwritten Signature*
Solicitors for Complainant.

NANNIE LONG,

Complainant,

VS.

TOM LONG,

Respondent.

IN THE CIRCUIT COURT OF

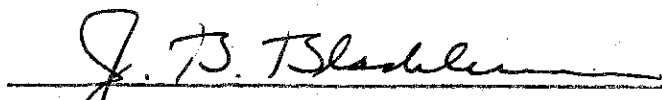
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER 1018.

ANSWER

Now comes the Respondent and for answer to the Bill of Complaint denies each and all of the allegations thereof and demands strict proof of same.

For further answer to the Bill of Complaint, Respondent consents that a Commissioner be appointed, testimony taken and the cause submitted for Final Decree without notice to him, all of which is hereby expressly waived.


Solicitor for Respondent.

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To Bernice F. Reid

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

Nannie E. Long

Curtis Stacey

as witnesses in behalf of Nannie E. Long in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

NANNIE LONG

Complainant

and TOM LONG

Defendant,

on oath to be by you administered, upon APRIL 6th, 1944 to take and certify the deposition s. of the witness es. and return the same to our Court, with all convenient speed, under your hand.

Witness 6th day of April 19 44



REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

The State Of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

NANNIE LONG

Complainant

VS

TOM LONG

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decrees Pro Confesso on _____ 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 _____ NANNIE LONG is forever divorced from the said

TOM LONG

for and on account of _____ CRUELTY

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 _____ NANNIE LONG AND TOM LONG be, and ~~they are~~ hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that _____ NANNIE LONG the _____ COMPLAINTANT pay the cost herein, to be taxed, for which execution may issue.

This 10th day of April, 1944
A. W. 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.

RECORDED

No. Page

The State Of Alabama
Baldwin County
In Circuit Court, In Equity

.....
NANNIE LONG

.....
vs. Complainant.

.....
TOM LONG

.....
Respondent.

DIVORCE DECREE

1018

NANNIE LONG
Complainant,
VS.
TOM LONG
Respondent.

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

NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from
Bay Minette, in the County of Baldwin

Alabama, the place of trial of said cause, to-wit:

Nannie Long

Curtis Stacey

2. That said complainant requires an oral examination of said witnesses before a commissioner appointed by the Register of this Court.

BEEBE & HALL

BY

Her Hall
Solicitor for Complainant.

NOTE:

Complainant suggests the name of Bernice F. Reid,

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

BEEBE & HALL

By

Her Hall
Solicitor for Complainant.

1018

PT-6-40-580

DEMAND FOR ORAL EXAMINATION.

Jany
Complainant,

Vs.

Jany
Respondent.

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

Filed this *7th* day of *April*,

194*4*.....
R. D.
Register.

NO. 1218

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

NANNIE LONG

Complainant
vs.

TOM LONG

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Bernice F. Reid

WITNESSES:

Nannie Long

Curtis Stacey

1094

1018

RECORDED

Jerry

O.J.

Jerry

Quinn and Meier

Quinn and Meier
1944

1018

RECORDED

NANNIE LONG
COMPLAINANT

VS

TOM LONG
RESPONDENT

DIVORCE.

SUMMONS AND COMPLAINT.

2000-12th 1943
Completed on

Tom Long

W.R. Stewart

Sheriff

By B.H. Greene Deputy Sheriff

Index 11-5743
Tom Long

NANNIE LONG

COMPLAINANT

VS.

TOM LONG

RESPONDENT

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, _____

DECREE PRO CONFESSO. TESTIMONY OF COMPLAINANT'S WITNESSES

and in behalf of Defendant upon _____

[Handwritten Signature]

Register.

RECORDED

No. 1018

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Lang

VS.

Lang

NOTE OF TESTIMONY

Filed in Open Court this 22

day of April 1944

R. Duck

Register.

STATE OF ALABAMA
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon TOM LONG to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery Jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by NANNIE LONG against the said Tom Long, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court this the 5th day of November, 1943.


Register.

NANNIE LONG
COMPLAINANT
VS
TOM LONG
RESPONDENT.

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

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

Now comes your Complainant, Nannie Long, and humbly complaining against the Respondent, Tom Long, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That Complainant and Respondent are bona fide residents of Baldwin County, Alabama, and over the age of twenty-one years;

2.

That they were married at Brewton, Alabama, on August 8th, 1921, and lived together as husband and wife in Baldwin County, Alabama until, to-wit, October 1st, 1943;

3.

That on, to-wit, October 1st, 1943, and at various other times the Respondent committed actual violence to the person of the Complainant by striking her, slapping her, and pulling her hair, and on various occasions cursed, threatened and abused her; that the conduct of the Respondent was such as to give the

THE STATE OF ALABAMA
Baldwin County

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

NANNIE LONG COMPLAINANT

VS.

TOM LONG RESPONDENT

I, Bernice F. Reid

as Register and Commissioner

have called and caused to come before me

Nannie Long and Curtis Stacey

witnesses named in the Requirement for Oral Examination, on the 6th day of April

1944, at the office of BEEBE & HALL

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

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

Nannie Long doth depose and say as follows:

My name is Nannie Long. I am a bona fide resident of Baldwin County, Alabama, and over twenty one years of age. The Respondent Tom Long is over twenty one years of age, and a bona fide resident of Baldwin County, Alabama.

The Respondent and I married at Brewton, Alabama, on August 8th, 1921. We lived together as husband and wife in Baldwin County, Alabama, until October 1st, 1943.

The Respondent, on October 1st, 1943, and at other times, committed actual violence to my person by striking me, slapping me, pulling my hair, and on various occasions threatened and abused me. The conduct of the Respondent was such as to give me every reasonable apprehension to believe that if I continued to live with him he would carry out his threats and do further violence to my person which would endanger my life and health.

The conduct of the Respondent toward me was such as to render it absolutely impossible for me to live with him as his wife.

Nannie E. Long

Curtis Stacey, a witness for the Complainant, being first duly sworn, deposes and says:

My name is Curtis Stacey. I live at Atmore, in Escambia County, Alabama. I am personally acquainted with Nannie Long and Tom Long, and have known them for the past ten years and more. I knew and had occasion to be around them during the time they lived together as husband and wife. I know that on several occasions the Respondent has abused the complainant, and his conduct toward her was such that it was absolutely impossible for her to live with him in any peace, as his wife,

Curtis Stacey

ORAL EXAMINATION

I, Bernice F. Reid, as Register and Commissioner hereby certify that the foregoing deposition S 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 of H. M. Hall 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 6th day of April, 1944.

Bernice F. Reid (L. S.)

No. 1018 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

NANNIE LONG

Complainant

Vs.

TOM LONG

Respondent

ORAL DEPOSITION

Filed April 7th, 1944
Bernice F. Reid, Register

RECORDED IN

Record _____

Vol. _____ Page _____

Register _____