

RECORDED

No. Page

The State Of Alabama
Baldwin County

In Circuit Court, In Equity

CHARLIE SMITH

vs. Complainant.

IDA SMITH

Respondent.

DIVORCE DECREE

Handwritten signature and date: Charles Smith, Dec 15, 1919

It is the order of the Court that the parties to the within divorce shall be separated and shall have no further marital relations with each other, and that the husband shall pay to the wife the sum of \$100.00 per month for her maintenance and support, which sum shall be paid to her on the first day of each month during the term of the decree.

It is further ordered that the costs herein be taxed for which execution may issue.

Witness my hand and seal of the Court at Baldwin County, Alabama, this 15th day of December, 1919.

Register of the Court

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To DOROTHY CLARK:

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 Charlie Smith and Clara Johnson

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Charlie Smith

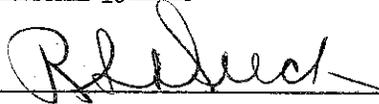
Complainant

and Ida Smith

Defendant,

on oath to be by you administered, upon oral interrogatories to take and certify the deposition s. of the witnesses s. and return the same to our Court, with all convenient speed, under your hand.

Witness 15th day of December 1943.



REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

CHARLIE SMITH,
COMPLAINANT,

-vs-

IDA SMITH,
RESPONDENT,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

DEPOSITION

TESTIMONY OF CHARLIE SMITH

My name is Charlie Smith and I am the Complainant in the above entitled action for divorce.

I was married to the Respondent Ida Smith in Brewton, Alabama in the year 1905 and have been a resident of Alabama every since and of Foley, Alabama for more than ten years.

My wife and I lived together for more than thirty years and raised a family of five children of our own and two children of hers by a former marriage but after the children got grown and left home to establish their own homes my wife was not satisfied to live with me any longer and although I gave her no cause or reason for leaving she did leave me in September 1937 and went to live with the children and has refused to live with me every since although I have many times asked her to come back and have always been ready to provide a home for her.

It is now obvious that she will never live with me again and for that reason I desire a divorce.

Charlie Smith

TESTIMONY OF CLARA JOHNSON

My name is Clara, (Mrs. Nathan) Johnson and I am the daughter of Charlie Smith and Ida Smith and their youngest child.

I was the only child at home when they separated in 1937.

For sometime before that they had not been getting along although I could not see that it was any one's fault in particular, they just could not agree and mother just picked up and left and went to live with some of the other children.

I know that father tried to get her to come back and she refused and they have not lived together since.

Clara L. Johnson

CERTIFICATE

STATE OF ALABAMA, }
BALDWIN COUNTY, }

I Dorothy Clark, by virtue of the attached commission, the Commissioner to take the testimony of Charlie Smith and Clara Johnson to hereby certify that I caused said witness to appear before me in my office in Foley, Alabama and after said witnesses were duly cautioned and sworn I took down their testimony in shorthand, later transcribed the same on the typewriter and the same was read over and signed by said witnesses.

That I have personal knowledge of the identity of said witnesses, am not of counsel or of kin to said witness or the parties to said cause and am not in any way interested in the result thereof.

In witness whereof I have hereunto set my hand this 16th. day of December, 1943.

Dorothy Clark

COMMISSIONER

CHARLIE SMITH,
COMPLAINANT,
-VS-
IDA SMITH,
RESPONDENT ,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN CHANCERY

-VS-

BILL OF COMPLAINT

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

PART ONE

Comes now Charlie Smith, the Complainant in the above entitled cause, and respectfully shows to the court that he is over the age of 21 years and for many years a bona fide resident of Baldwin County, Alabama residing at Foley therein and that the Respondent Ida Smith is also over the age of 21 years and a resident of Foley Baldwin County, Alabama.

PART TWO

1. Your Complainant further avers that he was married to the Respondent in Brewton, Alabama in the year of 1905 and at all times since his marriage has conducted himself towards the Respondent has a faithful and Provident husband.

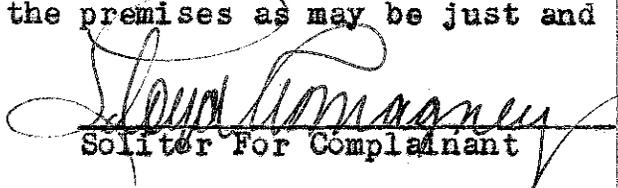
2. That the parties lived together as husband and wife for more than 30 years and raised a large family but in the month of September 1937 the Respondent, without good cause, abandoned the bed and board of your Complainant and has refused to live with him since wherefore he desires a divorce from the Respondent.

PRAYER FOR PROCESS

Wherefore your Complainant prays that Your Honor will grant to him the writ of summons of the State of Alabama commanding the Respondent Ida Smith to appear before the Honorable Court within the time allowed by law and answer, demur or otherwise plead to this Bill of Complaint, and your Complainant shall ever pray; & c.

PRAYER FOR RELIEF

Your Complainant further prays that, upon the final hearing of this cause Your Honor will grant to him a decree of divorce from the Respondent, Ida Smith and that he may have such other, further and additional relief in the premises as may be just and equitable


Solitor For Complainant

 Charlie Smith.

 VS.

 Ida Smith.

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, _____
 and Testimony of Charlie Smith and Clara Johnson.

and in behalf of Defendant upon _____ Answer & Waiver.

Register Register.

No. 1036.

RECORDED

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Charlie Smith.

VS.

Ida Smith.

NOTE OF TESTIMONY

Filed in Open Court this 20th

day of Dec, 1943



Register.