

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

	· ·	· · · · · · · · · · · · · · · · · · ·	Complainant
		V3	
BARTOW	BROWNING		Respondent
This cause coming on	to be heard was	submitted upon Bill of	Complaint, Dansey Post South
Answer and Waive:		and Testimony :	es noted by the Register, and u
sideration thereof, the in said bill.	Court is of the op	oinion that the Complai	nant is entitled to the relief pra
e Same S			
It is therefore ordered ore existing between	i, adjudged and de the Complainant	ecreed by the Court the and Defendant be, an	at the bonds of matrimony hed the same are hereby, disolv
I that the said	Adele Browning	3	
forever divorced from	the said		
	Bartow Brownia	ng	
and on account of—	Habitual Inter	nperance	
and on account of—			
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	The State Of Alabama Baldwin County Circuit Court, In Equity vs. Complainant. Respondent. DIVORCE DECREE	
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ADELE BROWNING
COMPLAINANT
Baldwin County
VS
Alabama
BARTOW BROWNING
RESPONDENT
IN EQUITY

To THE HONORABLE F. W. HARE, Judge of said Court, sitting in Equity:

Comes your Complainant, Adele Browning, and respectfully exhibits this, her Bill of Complaint, against Bartow Browning and shows unto Your Honor as follows:

First: Complainant and Respondent intermarried on April 4th 1931 at Elba, Alabama, and have both been residents of the State of Alabama ever since, at present, and for 18 months past, being residents of Baldwin County, Alabama, and both parties herete are past the age of 21 years.

Second: Subsequent to said marriage, Respondent became addicted to the habitual use of intoxicating alcoholic beverages and for three years past has been under the influence of intoxicating alcoholic beverages frequently and regularly.

Prayer for Process

The premise considered, Complainant prays that said Bartow Browning, the said Respondent, be made Defendant to this Bill and, by appropriate process, be required to answer the same within the time prescribed by law and to obey such orders and decrees as may be made in the premises.

Prayer for Relief

The Complainant prays upon the hearing of this cause that a decree be rendered forever divorcing her from Respondent, granting her the right to remarry should she so desire and granting her such other, different and further relief as may appear proper in the premises.

Solcitor for Complainant.

ADELE BROWNING

In Equity

Complainant

Circuit Court

BARTOW BROWNING

Respondent

Baldwin County

Alabama

Comes the Respondent in the above styled cause and, for answer to the Bill of Complaint, says that he denies each and every allegation contained therein except such allegations as relate to ages, residence, dates and the existence of said marriage.

Further, Respondent waives notice of demand for oral examination of Complainant's witnesses, the issue of formal commission to take testimeny, notice of the time and place of taking same and the right to cross examine or introduce evidence in his behalf and agrees that this cause may be submitted for final decree at any time without further notice to him on the pleadings and Complainant's evidence as noted by the Register.

BARTOW BEOWNING. Respondent.

State of Alabama Baldwin County

Before me, E. Cramer, a Notary Public in and for said County and State, personally appeared Bartow Browning, who is known to me, and he acknowledged that he voluntarily executed the foregoing answer and waiver with full knowledge of its contents.

Given under my hand and official seal this // day of January, A. D. 1944.

(Seal)

Notary Public, Baldwin County, Ala.

The	State of Alabama, Baldwin County.	Circuit Court of Baldwin County, Alabama (In Equity.)
	Adele Browning	Complainant.
	and the second	VS.
4	Bartow Browning	Respondent.
I F	Frances G. Crawford	
as Registe	er and Commissioner	
have called	dand caused to come before me	
	Thomas O. Hall and Adele Br	owning
witness es	named in the Requirement for Or	al Examination, on the lathday of January
19 41.4 .a	t the office of R. Gramer . At	tomey
		, and having first sworn said witnesses_to speak the
•		ruth, the said Thomas O. Hall
	whole truth, and nothing but the tr	
	•	Browning, being married to her sister
		rowning for about ten years. Within the
, , , , , , , , , ,	•	drinking more heavily all the time and
with	nin the past two years, I hav	e seen him very often and usually he has
beer	n drunk. I know that he is dr	unk at least four times each week and
that	t has been the truth about hi	s conduct for two years or more. I have
seex	n him four or five times in t	he past two weeks and he has been drunk
evel	ry time.	4.
• • • • • • •		Thomas O. I (all
,		depose and say:
		ed April 4th 1931 at Elba, Alabama, and we
		since. We are both more than 21 years of age
_		County, Alabama, for more than 16 months past.
**********		pecause of my husband's drinking habits which
		led, I left him. For about 3 years past, he
	·	es been getting drunk and beastly. as a result
		for weeks on end. I cannot stand living with
		es to do better, he has gotten steadily worse.
He 1	s practically a common drunk.	Alla Braina

I, Frances G. Crawford, as Register and Commissioner hereby certify
that the foregoing depositionson Oral Examination was taken down in writing by me in the words
of the witnesses_and read over tothemandtheysigned the same in the presense of
myself
at the time and place herein mentioned; that I have personal knowledge of personal identity of said
witness_esor 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, this 11th day of Jamary, 1944 ctor. (L. S.)
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Register,	Vol. Page Page	Filed	Oral Deposition	${\tt Respondent}.$	vs. Complainant		IN CIRCUIT COURT, IN EQUITY.	THE STATE OF ALABAMA BALDWIN COUNTY	NO. 1045 PAGE
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John John St.

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Adele Browning.	
	THE STATE OF ALABAMA
	BALDWIN COUNTY
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VS.	
Bartow Browning.	IN EQUITY
	CIRCUIT COURT OF BALDWIN COUN
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The State of Alabama, BALDWIN COUNTY

BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

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VS.

Bartow Browning.

NOTE OF TESTIMONY

Filed in Open Court this 13th

day of Jan

Register.

Moore Printing Co.