

THE STATE OF ALABAMA }
Baldwin County }

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

Virginia Williams Johnson COMPLAINANT

VS.

Richard Johnson RESPONDENT

I, R. S. Duck

as Register and Commissioner

have called and caused to come before me the complainant, Virginia Williams Johnson and James Fields

witnesses named in the Requirement for Oral Examination, on the 21st day of June

1944, at the office of myself at the Court House

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

the whole truth, and nothing but the truth, the said Virginia Williams Johnson

doth depose and say as follows:

My name is Virginia Williams Johnson. I reside in Mobile County, Alabama. I have been a bona fide resident of Mobile County, Ala. for more than one year next preceding the filing of my bill of complaint in this cause. I am over the age of twenty-one year. The respondent, Richard Johnson is over the age of twenty-one year and resides at Stockton in Baldwin County, Alabama.

I am the said respondent Richard Johnson, were lawfully married to each other at Stockton, Baldwin County, Alabama on May the 11th, 1911, and lived together as man and wife until May 20th, 1933.

On May 20th, 1933, the said Richard Johnson voluntarily abandoned my bed and board and since said last date he has remained away therefrom voluntarily and continues, and we have not lived together as man and wife or otherwise since May 20th, 1933. His leaving our home and me was without my consent and since he left me I have worked and made my own living without any help from him. The said abandonment occurred more than one year next preceding the filing of my bill of complaint in this cause and occurred at Stockton in Baldwin County, Alabama.

Virginia Williams Johnson

ORAL EXAMINATION

I, R. S. Duck, 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^{es} and read over to them and they signed the same in the presence of myself H. E. Smith, Solicitor for Complainant at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness^{es} or had proof made before me of the identity of said witness^{es}; 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 21st day of June, 1944.

R. S. Duck

(L. S.)

No. 1139

Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Theresa W. Johnson

Complainant

Vs.

Richard Johnson

Respondent

ORAL DEPOSITION

Filed June 21, 1944

R. S. Duck
Register

RECORDED IN

Record _____

Vol. _____ Page _____

Register _____

And James Field, having been first duly sworn, as a witness in behalf of the complainant, testified in substance as follows:

I am about 70 years of age and for the past five years have lived in Mobile, Mobile County Alabama but up until that time I lived at Stockton, Baldwin County, Alabama. I have know both the complainat and the respondent all of their lives.

I remember when they got married about thirty years ago and I remember when he left her sometime about the year of 1933. Our famñlys at the time of the separation lived within two or three hundred yards of each other and for the past two years have been living about three blocks from each other . I see her nearly every day and have for the past two years and know that she and the respondent have not lived together as man and wife or otherwise during this two year period. She has been working and making her own living without any help from him.

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

Witnesses

J. E. Smith

His
James Field
marks

1138
RECORDED

Complaint

Johann
v

Johann

300 June 21 1944

Carl Johann
Johann

No. 1184 Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

RECORDED

vs. Complainant.

Respondent.

DIVORCE DECREE

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RECORDED

Armen and Stearns

Phyllis
Johnson

Phyllis
Johnson

Received
October 21, 1944
pay

Virginia Williams Johnson

Complainant

VS.

Richard Johnson

Respondent

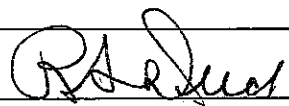
THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____

Answer and Waiver of Respondent, Oral Deposition of Witnesses
for Complainant namely: Virginia Williams Johnson and James
Field

and in behalf of Defendant upon _____

 Register.

No. 1139

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Virginia Johnson

RECORDED

VS.

Richard Johnson

NOTE OF TESTIMONY

Filed in Open Court this 21st

day of June 1944

R. Bell

Register.