

ALLENE WATTS,  
Complainant,  
VS.  
GAPER WATTS,  
Respondent.

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

ANSWER

Now comes the Respondent in the above entitled cause, and for answer to the Bill of Complaint filed against him in this cause says:

1. He accepts service and waives notice in the said cause.
2. He consents and agrees that a Commissioner be appointed, testimony taken and the cause submitted for final decree, all without notice to him, which notice is hereby expressly waived.
3. The Respondent denies each and all of the other allegations of the said Bill of Complaint and demands strict proof of same.

Gaper Watts

Witness:

H B McKie

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

Your Oratrix, Allene Watts, presents this Bill of Complaint against Caper Watts and thereupon your Oratrix complains and shows unto the Court and your Honor as follows:

1. Your Oratrix is over twenty-one years of age and a bona fide resident citizen of Baldwin County, Alabama, where she has resided continuously for more than one year next preceding the filing of this Bill of Complaint. The Respondent, Caper Watts, is a resident of Baldwin County, Alabama and is over twenty-one years of age.

2. Your Oratrix and the said Caper Watts were lawfully married by a minister of the gospel in Wilcox County, Alabama, in 1915 and lived together as man and wife until Christmas, 1940, when the said Caper Watts voluntarily abandoned your Oratrix without fault on her part. Your Oratrix and the said Respondent have not lived together since the said date.

#### PRAYER FOR PROCESS

Your Oratrix prays that the Court will take jurisdiction of the cause made by this Bill of Complaint; that due notice thereof be given to the Respondent, Caper Watts, in the form and manner prescribed by law requiring him to plead, answer or demur to the said Bill of Complaint within the time and under the pains and penalties provided by law and the practice of this Honorable Court.

#### PRAYER FOR RELIEF

The premises considered, your Oratrix respectfully prays for the following relief:

1. That the bonds of matrimony now existing between your Oratrix and the said Caper Watts be dissolved and that your Oratrix be forever divorced from him.
2. That your Oratrix be granted the right to re-marry.
3. Your Oratrix further prays for such other, further and general relief as she may be equitably entitled to the premises considered.

Respectfully submitted,

  
Solicitor for Oratrix.

ALLENE WATTS,  
Complainant,  
VS.  
CAPER WATTS,  
Respondent.

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

FINAL DECREE

This cause coming on to be heard on this date is submitted for Final Decree upon the original Bill of Complaint, Answer and the Testimony as noted by the Register, upon consideration of which the Court is of the opinion that the Complainant is entitled to the relief prayed for in her said Bill of Complaint, WHEREUPON it is therefore ORDERED, ADJUDGED AND DECREED by the Court as follows:

1. That the bonds of matrimony heretofore existing between the Complainant, Allene Watts, and the Respondent, Caper Watts, be, and the same are hereby dissolved and the said Complainant is forever divorced from the said Respondent on the ground of abandonment.

2. The said parties shall not marry except to each other until sixty days after this date and if an appeal is taken within sixty days, they shall not again marry except to each other during the pendency of the said appeal.

3. That the costs of this cause be and they are hereby taxed against the Complainant, for which execution may issue.

ORDERED, ADJUDGED AND DECREED on this the 29<sup>th</sup> day of

June, 1944.

F. W. Hare  
Judge.

ALLENE WATTS,

Complainant,

VS.

CAPER WATTS,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

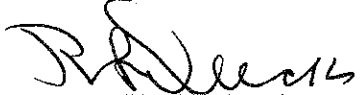
IN EQUITY.

NOTE OF TESTIMONY

This cause is submitted on behalf of Complainant upon  
the following:

1. Original Bill of Complaint.
2. Answer.
3. Oral Deposition of Complainant, Allene Watts,  
taken before Ora S. Nelson, as Commissioner.

Dated this 29th day of June, 1944.



Register.



Solicitor for Complainant.

**RECORDED**

NOTE OF TESTIMONY

ALLINE WATTS, **RECORDED**

Complainant,

VS.

**RECORDED**  
CAPER WATTS,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

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**RECORDED**

**DECREE**

**ALLEN WATTS,**

**Complainant,**

**VS.**

**CAPER WATTS,**

**Respondent.**

**RECORDED**

**IN THE CIRCUIT COURT OF**

**BALDWIN COUNTY, ALABAMA.**

**IN EQUITY.**

1144

BILL OF COMPLAINT

ALLEN WATTS,

Complainant,

VS.

CAPER WATTS,

Respondent.

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

*2nd June 24 1944*  
*Ed. J. [unclear]*

1144

ANSWER **RECORDED**

ALLEN WATTS,

Complainant,

VS.

CAPER WATTS,

Respondent.

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

*241944*  
*Watts*



THE STATE OF ALABAMA  
Baldwin County

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

ALLENE WATTS

COMPLAINANT

VS.

CAPER WATTS

RESPONDENT

I, Ora S. Nelson

as ~~Registrar and~~ Commissioner

have called and caused to come before me Allene Watts

witness— named in the Requirement for Oral Examination, on the 29th day of June  
1944, at the office of J. B. Blackburn

in Bay Minette, Alabama, and having first sworn said witness— to speak the truth,  
the whole truth, and nothing but the truth, the said Allene Watts

doth depose and say as follows:

My name is Allene Watts. I am over twenty-one years of age and am a bona fide resident citizen of Baldwin County, Alabama, where I have resided continuously for more than one year next preceding the filing of this suit. The Respondent, Caper Watts, is a resident of Baldwin County, Alabama and over twenty-one years of age.

I was lawfully married to the Respondent, Caper Watts by a minister of the gospel in Wilcox County, Alabama in 1915 and we lived together as man and wife until Christmas 1940 when he voluntarily abandoned me without fault on my part. I have not lived with the Respondent since the said date.

Allene <sup>her</sup> Watts  
mark

ORAL EXAMINATION

I, Ora S. Nelson, 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 \_\_\_\_\_

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 29th day of June, 19 44.

Ora S. Nelson (L. S.)

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**

IN CIRCUIT COURT, IN EQUITY

ALLENE WATTS,

Complainant

Vs.

CAPER WATTS,

Respondent

**ORAL DEPOSITION**

Filed June 29, 19 44

[Signature], Register

RECORDED IN

Record \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register \_\_\_\_\_

NO. \_\_\_\_\_

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**THE STATE OF ALABAMA**  
**Baldwin County**

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**CIRCUIT COURT**

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ALLENE WATTS,

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Complainant

VS.

CAPER WATTS,

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Defendant

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**Commission To Take Deposition**

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**COMMISSIONER:**

Ora S. Nelson

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**Witnesses:**

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