

1172

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

Your Oratrix, Louise Travis, presents this Bill of Complaint against Jack Travis, and thereupon your Oratrix complains and shows unto the Court and your Honor as follows:

1. Your Oratrix is a married woman over nineteen years of age and a resident of Baldwin County, Alabama. The Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama, but is now in the military service of the United States.

2. Your Oratrix and the said Respondent were lawfully married in Bay Minette, Alabama on December 1, 1941 and lived together as man and wife in Baldwin County, Alabama until during the month of July, 1943, when the Respondent voluntarily abandoned her without fault on her part.

PRAYER FOR PROCESS

Your Oratrix prays that the Court will take jurisdiction of this cause and that the usual process of this Honorable Court issue to the Respondent, requiring him to plead to, answer or demur to the Bill of Complaint filed in this cause within the time and under the pains and penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF.

Your Oratrix prays that upon a final hearing of this cause that the bonds of matrimony now existing between your Oratrix and the said Respondent be dissolved and that she be forever divorced from the said Respondent and granted the right to remarry. Your Oratrix further prays for such other, further and general relief as she may be equitably entitled to the premises considered.

J. B. Blackburn  
Solicitor for Oratrix.

LOUISE TRAVIS  
COMPLAINANT

VS

JACK TRAVIS  
RESPONDENT

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

And now comes the Respondent, and accepts service of the summons and complaint in this cause.

The Respondent denies each and every allegation contained in the Complainant's bill of complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony on behalf of the complainant, the right to cross examine complainant's witnesses, and consents that this cause be submitted herewith for final decree without further notice.

Jack D. Travis

WITNESS:

Albert Vrana

Bill v. Bates

LOUISE TRAVIS,  
Complainant,  
VS.  
JACK TRAVIS,  
Respondent.

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

NOTE OF TESTIMONY

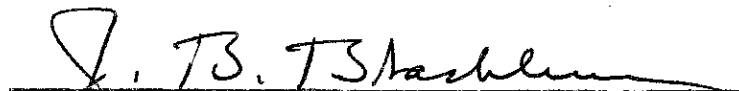
This cause is submitted on behalf of the Complainant upon the following:

1. Original Bill of Complaint.
2. Answer.
3. Oral Deposition of Louise Travis taken before Ora S. Nelson, as Commissioner.

Dated this 17th day of November, 1944.



Register.



Solicitor for Complainant.

THE STATE OF ALABAMA,  
Baldwin County

}

CIRCUIT COURT

TO Ora S. Nelson

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 Louise Travis

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Louise Travis is

Complainant  
and Jack Travis is

Defendant,

on oath to be by you administered, upon her

to take and certify the deposition of the witness and return the same to our Court, with all Convenient speed, under your hand.

Witness 17th day of November, 19 44

REGISTER

Commissioner's Fee \$

Witness' Fees, \$

**THE STATE OF ALABAMA,**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

LOUISE TRAVIS,

Complainant

VS.

JACK TRAVIS,

Respondent

I, Ora S. Nelson

as ~~Register and~~ Commissioner

have called and caused to come before me Louise Travis

witness named in the Requirement for Oral Examination, on the 14th day of October 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 Louise Travis doth depose and say as follows:

TESTIMONY OF LOUISE TRAVIS

I am the Complainant in this suit. I am a married woman over nineteen years of age and a resident of Baldwin County, Alabama. The Respondent, Jack Travis, is over twenty-one years of age, a resident of Baldwin County, Alabama but he is now in the military service of the United States.

I was lawfully married to the Respondent, Jack Travis, in Bay Minette, Alabama, on December 1, 1941 and we lived together as man and wife in Baldwin County, Alabama until during the month of July, 1943, at which time the Respondent, Jack Travis, voluntarily abandoned me without fault on my part. We have not lived together since the said date, that is, since July, 1943.

Louise Travis

LOUISE TRAVIS,

Complainant,

VS.

JACK TRAVIS,

Respondent.

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

DECREE

This cause coming on to be heard on this date is submitted for Final Decree on behalf of the Complainant upon the original Bill of Complaint, Answer and Testimony as noted by the Register, upon consideration of all of which it is thereupon ORDERED, ADJUDGED AND DECREED by the Court as follows:

1. That the bonds of matrimony heretofore existing between the Complainant, Louise Travis, and the Respondent, Jack Travis, be, and they are hereby dissolved and the Complainant is hereby divorced from the said Respondent on the ground of abandonment.

2. The said Complainant and Respondent, are each hereby permitted to again contract marriage but they shall not marry except to each other until after the expiration of sixty days from the date of this Decree and if an appeal is taken within sixty days they shall not marry except to each other during the pendency of the said appeal.

3. The costs of this proceeding are hereby taxed against the Complainant, for which execution may issue.

ORDERED, ADJUDGED AND DECREED this 23<sup>rd</sup> day of November, 1944.



Judge.

To The HONORABLE FRANCIS W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

IN EQUITY:

Comes W. S. THOMLEY and, by this, His Bill of Complaint presented against MARIE MEYERS, VICTOR ROSEQUIST, GRACE M. BLOOM and JOHN P. MEYERS, respectfully shows:

First: That the Complainant is a resident of Baldwin County, Alabama, and over the age of twenty one (21) years and that the defendants, Marie Meyers, Victor Rosequist, Grace M. Bloom and John P. Meyers, are all over the age of twenty one (21) years and all of said defendants are non-residents of the State of Alabama and the present whereabouts of any of said defendants is unknown.

Second: That the Complainant is the owner and in actual and peaceful possession and occupancy of certain real property located in Baldwin County, Alabama, and described as follows, to wit:

Farm Lot Eight (8) in Farm Ten (10) as per plat on file in the office of the Alabama Tobacco Company, being the South Half ( $\frac{S}{2}$ ) of the Southeast Quarter ( $\frac{SE}{4}$ ) of the Northwest Quarter ( $\frac{NW}{4}$ ) of the Southeast Quarter ( $\frac{SE}{4}$ ) of Section Thirty Five (35), Township Five (5) South, Range Four (4) East.

Third: That Defendants, Marie Meyers, Victor Rosequist, Grace M. Bloom and John P. Meyers, are reputed to claim some right, title, or interest to or claim in the above described property.

Fourth: That no suit is pending affecting or tending to determine the claim of any party to said lands.

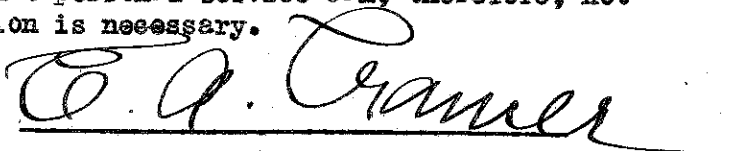
THE PREMISES CONSIDERED, Complainant prays that MARIE MEYERS, VICTOR ROSEQUIST, GRACE M. BLOOM and JOHN P. MEYERS be made parties Defendant to this Bill and in as much as all of said Defendants are non-residents and the whereabouts of all of said defendants being unknown, that they be given notice by publication in The Fairhope Courier, a newspaper published in Fairhope, Baldwin County, Alabama, requiring them to plead, answer or demur to the Bill of Complaint within the time prescribed by law and to abide by such orders or decrees as may be made in the premises.

Complainant further prays that, upon hearing of this cause, a decree be rendered declaring that the said Marie Meyers, Victor Rosequist, Grace M. Bloom and John P. Meyers have no claim, right or interest in the above described property and forever quieting all claim or demand on their part against the same. Complainant further prays for such other, further or different relief as to Equity may seem meet.

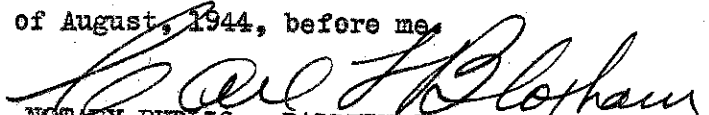
  
Solicitor for Complainant.

State of Alabama  
Baldwin County

Before me, the undersigned Notary Public in and for said County and State, personally appeared E. A. Cramer, who, being duly sworn according to the law, deposes and says that he is solicitor of record for the Complainant in the foregoing cause and that he is reliably informed, and, on such information, states that Marie Meyers, Victor Rosequist, Grace M. Bloom and John P. Meyers are non-residents of the State of Alabama and that the present whereabouts of all of them is unknown; that personal service can, therefore, not be had and that service by publication is necessary.



Subscribed and sworn to this 2nd day of August, 1944, before me,

  
NOTARY PUBLIC BALDWIN COUNTY ALABAMA.

1172

BILL OF COMPLAINT

LOUISE TRAVIS,

Complainant,

VS.

JACK TRAVIS,

Respondent.

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

*James H. Smith*  
*August 25 1944*  
*James H. Smith*  
*Reporter*



F. Wick

11-17-44

R.S. Service -

Repairs

DECREE

LOUISE TRAVIS,

Complainant,

VS.

JACK TRAVIS,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

**ORAL EXAMINATION.**

I, Ora S. Nelson, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition—on Oral Examination was taken down by me in writing 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 proom 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 17th day of November, 1944.

Ora S. Nelson (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

LOUISE TRAVIS,

vs. Complainant

JACK TRAVIS,

Respondent.

**Oral Deposition**

Filed 11-17, 1944

R. S. Wicks, Register.

Recorded in

Record

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

, Register.

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

**THE STATE OF ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

LOUISE TRAVIS,

Complainant

vs.

JACK TRAVIS,

Defendant

**Commission To Take Deposition**

**COMMISSIONER:**

Ora S. Nelson

**Witnesses:**

NOTE OF TESTIMONY

LOUISE TRAVIS,

Complainant,

VS.

JACK TRAVIS,

Respondent.

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