(222)

DIVORCE DECREE

Moore Printing Co., Bay Minette, Ala.

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

AMANDA WATTS Complainant

VS.

VIRGUS B. WATTS Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~XXXXXXXXXXXXXX~~ ~~XX~~ Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in said bill.

It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said Amanda Watts is forever divorced from the said Virgus B. Watts for and on account of Abandonment.

It is further ordered that Respondent pay to Complainant Twenty-five dollars as a part of her counsel fee.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Virgus B. Watts the Respondent pay the cost herein to be taxed, for which execution may issue.

This 18th day of November, 1944

F. M. Hare

Judge Circuit Court, in Equity.

I, ROBERT S. DUCK, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office

Witness my hand and seal this the _____ day of November, 1944

Register of Circuit Court, in Equity

No. _____ Page _____

The State of Alabama

BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

AMANDA WATTS

vs. Complainant

VIRGUS B. WATTS

Respondent

DIVORCE DECREE

Filed this _____ day of

_____, 194__

Register

8581. NOTE OF TESTIMONY

Moore Printing Co.

Amanda Watts.

VS.

Virgis B Watts.

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 Testmony of Amanda. Watts and Amanda Nashville.

and in behalf of Defendant upon Answer and Waiver

Register.

No. 1222

The State of Alabama,

BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Amanda Watts.

VS.

Virgus BWatts,

NOTE OF TESTIMONY

Filed in Open Court this 16

day of November, 1944

Register.

Moore Printing Co.

AMANDA WATTS
Complainant

vs

VIRGUS B. WATTS
Respondent

E Q U I T Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Comes BURGESS WATTS, Respondent in the above styled cause, and for answer to the bill of complaint says he denies each and every allegation of same.

Respondent hereby waives notice of demand for oral examination of Complainant's witnesses; of the issue of commission to take testimony of the time and place set for taking same and of the right to introduce evidence in his own behalf. He further agrees that this cause may be submitted for final decree at any time on the pleading and Complainant's evidence as noted by the Register.

Virgus B Watts
Respondent

Before me the undersigned Notary personally appeared BURGESS WATTS who acknowleged that he executed the foregoing answer voluntarily with knowledge of its contents.

Witness my hand and official seal ~~this the~~ 11 day of November, 1944.

Notary Public, Mobile County, Ala.

Notary Public, Mobile County, Alabama.
My commission expires Aug. 25, 1945.
Bonded by American Surety Co. of N. Y.

2143

1222

AMANDA WATTS,
Complainant.

vs

VIRGUS B. WATTS,
Respondent.

--- - - ---

ANSWER AND WAIVER.

- - - - -

Filed Mar 14 1944

AMANDA WATTS
Complainant

vs

VIRGUS WATTS
Respondent

E Q U I T Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

DEPOSITIONS OF AMANDA WATTS and AMANDA NASHVILLE

WITNESSES FOR COMPLAINANT.

Said witnesses being duly sworn upon examination by Solicitor for Complainant testified as follows:

AMANDA WATTS

I am the Complainant in this case and both Virgus Watts and I are over the age of twenty-one years and have been life-long residents of Alabama; I living in Daphne and he now in Mobile County.

Virgus Watts and I were married in Conecuh County, Alabama about forty-seven years ago and moved to Baldwin County where we lived together up to about eight years or more ago, when he went off and left me and our thirteen children and since then I have seen him only once when I passed him on the highway about seven years ago, but have not lived with him nor has he done anything for the support of the children or me in all this time. He has lived separate and apart from us, for awhile in Baldwin County but now in Mobile County. I have lived continuously in Baldwin all my life.

Amanda Watts

AMANDA NASHVILLE

I am a daughter of the parties to this cause and live about two miles from my mother's home. I see her constantly and know that my father left her more than eight years ago and since that time she has raised and supported us children without any help from him nor has she seen him in this time except the one occasion she spoke of seven years ago. I know of my own knowledge that he has completely neglected and abandoned her.

Amanda Nashville

CERTIFICATE

I, Patricia F. Lord, acting as commissioner by agreement of parties hereby certify that in the case of AMANDA WATTS, Complainant, vs VIRGUS WATTS, Respondent, pending on the Equity side of the Circuit Court of Baldwin County, I caused AMANDA WATTS and AMANDA NASHVILLE, witnesses for Complainant, to appear before me in my office over the Bank of Fairhope, Fairhope, Alabama, where, after being duly sworn, upon examination by the Solicitor for the Complainant, they testified as is herein set out; and their testimony after being reduced to writing was read over and signed by them.

I further certify that I am neither of counsel nor of kin to either party to the cause or in anywise interested in the result thereof.

In witness whereof, I hereto set my hand and seal as commissioner this the 14th day of November, 1944.

Patricia F. Lord
Commissioner.

1221

Lisbrary

Watts

220

Watts

Filed Nov 15-1944

[illegible]

Deyer

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT

OF BALDWIN COUNTY, ALABAMA; IN EQUITY.

Comes AMANDA WATTS, and by this her Bill of Complaint, presented against VIRGUS B. WATTS, respectfully shows:

FIRST: That Complainant and Defendant are both over the age of twenty-one years; that both are now and have been for more than five years bona fide residents of Alabama.

SECOND: That Complainant and Defendant were married in Conecuh County, Alabama, about forty-seven years ago and subsequently moved to Baldwin County but have not lived together for the past eight years.

THIRD: That Complainant has lived separate and apart from the bed and board of Defendant for more than two years next prior to the filing of this bill without support from Defendant and has bona fide resided in the State during this period.

FOURTH: That Defendant abandoned Complainant and the thirteen children of the marriage and she is reliably informed that he is living with another woman somewhere West of the City of Mobile in Mobile County.

THE PREMISES CONSIDERED, Complainant prays that Virgus B. Watts be made party defendant to this cause, and by proper process required to answer this Bill within the time prescribed by Law.

Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from said Virgus B. Watts, granting her the right to marry again should she so desire, and to have such other, further or different relief as to equity may seem meet.

Elliott B. Richey

Solicitor for Complainant.