

CIRCUIT COURT, IN EQUITY.

THE STATE OF ALABAMA,

Baldwin County.

No. May Term, 1917.

Charley Kennedy

Complainant

vs.

Janie Kennedy

Defendant

To T. W. Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Page & Moorer

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Page & Moorer Solicitors for Complainant.

No. 7 Page.....

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

vs.

REQUEST FOR DECREE IN
VACATION.

Filed May 28 1917

[Handwritten Signature]
Register.

Recorded in.....Record

Vol.....Page.....

Register.

Charlie Kennedy

Complainant.

vs.

Janie Kennedy,

Respondent.

THE STATE OF ALABAMA,

COUNTY.

CIRCUIT COURT OF

COUNTY,

IN EQUITY.

In this cause it being made to appear to the Court that a Summons was served upon the Defendant.....

Janie Kennedy

by the Sheriff of Baldwin County, on the 23rd day of

April 1917, requiring her to appear and plead, answer or demur to the

Bill of Complaint in his cause within thirty days from the service of said Summons, and the said Defendant.....

having failed to plead, answer or demur to the said Bill to the date hereof. It is now, therefore, on motion of

Complainant, ordered and decreed that the said Bill of Complaint in this cause be, and it hereby is, in all things,

taken as confessed against the said Janie Kennedy

Defendant aforesaid.

This 28th day of May 1917.

T. W. Pickens

Register ~~Judge~~ of the Circuit Court of

Baldwin County.

No. 7

IN EQUITY.

CIRCUIT COURT OF

..... COUNTY,

us.

DECREE OF PRO CONFESSO.

Filed in office this 28 day of

May 1917

T. W. Peterson

Register.

E. O. M.

Charlie Kennedy,
Complainant.

THE STATE OF ALABAMA,
Baldwin County.

vs.

Janie Kennedy,
Defendant.

IN EQUITY,
CIRCUIT COURT OF
Baldwin COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint...decree
pro confesso and testimony of George Mills and Charlie Kennedy.

and in behalf of Defendant upon.....

No. 7

THE STATE OF ALABAMA,

Baldwin County.

IN EQUITY,

CIRCUIT COURT OF

Baldwin COUNTY.

Le Marie Keady

vs.

Janie Keady,

NOTE OF TESTIMONY.

Filed in Open Court this 18th

day of June 1917

D. W. Peckham
Register.

THE STATE OF ALABAMA,

Baldwin County.

No. CIRCUIT COURT IN EQUITY.

Charlie Kennedy

Complainant

vs.

Janie Kennedy

Defendant

Motion is hereby made for a Decree Pro Confesso against

Janie Kennedy

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant.....ha..... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 13th day of August 1917.

Page Turner

Solicitor.

No. Page

THE STATE OF ALABAMA,

..... County,

CIRCUIT COURT, IN EQUITY.

us.

MOTION FOR DECREE
PRO CONFESSO ON
PERSONAL SERVICE.

Filed Aug 13 1907

W. H. ...

Register.

Recorded in Record

Vol. Page

Register.

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT OF
Baldwin COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Janie Kennedy

of Baldwin County, to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after
the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited
by Charlie Kennedy

against said Janie Kennedy

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defend-
ant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your
endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T.W. Richerson, Register of said Circuit Court, this

25rd day of April 1917.

T.W. Richerson
Register.

James Kennedy
Served on *James Kennedy*

CIRCUIT COURT OF
Baldwin COUNTY,
IN EQUITY.

No. *7*
SUMMONS.

Charles Kennedy

vs.
James Kennedy

.....
.....
.....
.....

Page Theomer
Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA,
Baldwin County.

Received in office this *23*
day of *April* 19*17*
C. E. Curbanks
Sheriff.

Executed this *23* day of
April 19*17*
by leaving a copy of the within Summons
with *James Kennedy*
Defendant.....

C. E. Curbanks Sheriff.
By *D. B. Richerson* Deputy Sheriff.

went to the Young Men's Cafe and endeavored to get a room. I never saw them in Mobile, Alabama together. I do not know whether or not they introduced themselves as man and wife. I did not consent to Janie Kennedy committing this act. There was no condonation on my part toward Janie Kennedy for committing this offense. I have not lived with Janie Kennedy since the commission of the act. Mansfield Jones did carry Janie Kennedy over to Mobile about June 12st, 1915.

Charlie Kennedy

Sworn and subscribed to before me this 18th day of June, 1915.

Register in Chancery.

Registers Certificate.

I, T. W. Richerson, Register in Chancery, named by the Complainant in the case of Charlie Kennedy vs Janie Kennedy, to take the testimony in said cause, do hereby certify that on the 18th day of June, 1917, I caused the witnesses for the complainant, George Mills and Charlie Kennedy to come before me at Bay Minette, Alabama, at my office; that said witnesses were known or made known to me and that they were duly sworn to speak the truth, the whole truth and nothing but the truth, and testified as is set down in the foregoing pages; that their testimony was reduced to writing and was subscribed to by them in my presence after having been read over to them.

I further certify that I am not of counsel nor of kin to either of the parties to this suit, nor am I in any manner interested in the result thereof.

Witness my hand and seal this 18th day of June, 1917.

T. W. Richerson
Register in Chancery

Filed 10/18-1917
J. W. [unclear]
Register

selves as man and wife? Did Charlie Kennedy consent to Janie Kennedy committing this act? Was there any condonation on the part of Charlie Kennedy toward Janie Kennedy for the commission of this offense? Has Charlie Kennedy lived with Janie Kennedy since the commission of this act?

Did Mansfield Jones carry Janie Kennedy over to Mobile about June 12th, 1916

CHAPMAN & MOORE,

Solicitors for Complainant.

State of Alabama,

Baldwin County

Before me, T. W. Richerson, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared H. D. Moorer one of the attorneys in the above cause, and who being by me first duly and legally sworn doth depose and say--that the answers to the above interrogatories will be material testimony for the said petitioner.

H. D. Moorer

Sworn and subscribed to before me this 18th day of June, 1917.

T. W. Richerson
Clerk of Circuit Court.

Petitioner suggest Mr. T. W. Richerson, Register in Chancery of Baldwin County, Alabama, as a suitable and proper person to take the testimony in the above cause, and of the above named witnesses.

Filed 6/8/97
T. W. Johnson
Register,

CHARLIE KENNEDY,)
 Complainant.)
 vs)
 Janie Kennedy,)
 Defendant.)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

In Equity.

Answers to interrogatories propounded to Charlie Kennedy, a material witness for the complainant in the above styled cause.

To the first interrogatory:

I am Charlie Kennedy. I am over the age of Twenty-one years. I have lived in Baldwin County, Alabama for the last thirty years. I reside at Foley, Alabama.

I do know Janie Kennedy. She is over the age of 21 years. She resides in Mobile, Alabama. She resided in Mobile on or about March 15, 1917.

To the second interrogatory:

Janie Kennedy and myself were married, and lived together as man and wife. We lived together as man and wife from May 24th, 1909 until 12th day of June, 1915. We were married in Mobile, Alabama May 24th, 1909.

To the third interrogatory:

I do know Mansfield Jones. I have seen Mansfield Jones and Janie Kennedy together at my house. He visited my house a number of times--the number I cannot give. Mansfield Jones did call at my house frequently while we were living together as man and wife. He often called while I was away. I am no kin to Mansfield Jones, nor is Janie Kennedy of any relation to him. Mansfield Jones was with Janie Kennedy on or about June 1st, 1915. They went to Mobile together. I do not know of them passing as man and wife in Mobile, Alabama, only from what I have heard. I do not know whether or not they went to George Mills house. I do not know whether or not Mansfield Jones and Janie Kennedy

CHARLIE KENNEDY,
Complainant.

vs

Janie Kennedy,
Defendant.

IN THE CIRCUIT COURT OF BALD-
WIN COUNTY, ALABAMA.

In Equity.

Interrogatories to be propounded to Charlie Kennedy,
George Mills and ~~Janie Kennedy~~ material witnesses for the complain-
ant in the above styled cause.

1. Do you know Charlie Kennedy? Is he over the age of
Twenty-one years? Where does he reside? How long has he lived
in Baldwin County, Alabama? Has he lived in Baldwin County for
a period of more than three years? ~~He is over the age of 21 years, that he is of the age of 21 years.~~

Do you know Janie Kennedy? Is she over the age of
Twenty-one years? Where does she reside? Where did she re-
side on or about March 15th, 1915?

2. Were Charlie Kennedy and Janie Kennedy ever married?
Did they live together as man and wife? How long did they live
together as man and wife? Where were they married? When were
they married?

3. Do you know Mansfield Jones? Did you ever see Mans-
field Jones and Janie Kennedy together, if so, where did you
see them? About how many times did you see them together. Did
Mansfield Jones call at Charlie Kennedys house frequently while
Charlie and Janie Kennedy were living together as man and wife?
Did he often call while Charlie was away? Is Mansfield Jones
any kin to Charlie Kennedy or Janie Kennedy? Do you know of
Mansfield Jones being with Janie Kennedy on or about June 1st,
1915? Where did they go? Did they pass as man and wife in
while in Mobile, Alabama together? Did they go to George Mills
house and ask for a room stating that they were married and Man
and wife? Did they go to the Young Men's Cafe and endeavor to
rent a room saying that they were man and wife? Did you see
them in Mobile together often? Did they often introduced them-

Janice Kennedy runs with Martha Jones and can be found
at 877 Dauphin Street, Mobile, Alabama.

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They did go to the Young Men's Cafe and endeavor to rent a room saying that they were man and wife. I did see them together in Mobile, Alabama often. They did often introduce themselves as man and wife. I do not know whether or not Charlie Kennedy consented to Janie Kennedy committing this act. I do not know whether or not there was any condonation on the part of Charlie Kennedy toward Jannie Kennedy for committing this offense. Charlie Kennedy has not lived with Janie Kennedy since the commission of this act. I do not know whether or not Mansfield Jones carried Janie Kennedy over to Mobile, Alabama.

Geo Miller

Sworn and subscribed to before me this 18th day of
June, 1917.

T W Williamson

Register in Chancery and Commissioner

Filed 4/8-1917
T. W. Keenan
Register

CHARLIE KENNEDY,
Complainant.

vs

JANIE KENNEDY,
Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

In Equity.

Answers to interrogatories propounded to George Mills in the above styled cause.

Answer to the first interrogatory:

I do know Charlie Kennedy. He is over the age of Twenty-one years. I do not know where Charlie Kennedy lives. I do not know how long Charlie Kennedy has lived in Baldwin County, Alabama. I do not know whether or not Charlie Kennedy has lived in Baldwin County, Alabama for more than three years.

I do know Janie Kennedy? She is over the age of Twenty-one years. I do not know where she lives. I do not know where Janie Kennedy lived on or about March 15th, 1917.

Answer to the second interrogatory:

I do not know whether or ^{not} Charlie Kennedy were ever married. I do not know whether or not Charlie Kennedy and Janie Kennedy ever lived together as man and wife. I do not know where they were married. I do not know when they were married.

Answer to the third interrogatory:

I do know Mansfield Jones. I did see Mansfield Jones and Janie Kennedy together at several different places in Mobile, Alabama. I saw them together several times. I do not know whether or not Mansfield Jones called at Charlie Kennedys house while Charlie and Janie were living together. I do not know whether Mansfield Jones called while Charlie was away. I do not know whether or not they are of any relation. On or about June 12th, 1915 Mansfield Jones was with Janie Kennedy in Mobile, Ala. They came to my house and wanted to rent rooms. They told me that they were man and wife, ~~They~~ did come to my house stating that they were married and man and wife.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT,
IN EQUITY.

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
AND TO THE HONORABLE A. E. GAMBLE, JUDGE THEREOF:-

Your Orator, Charlie Kennedy, respectfully represents
and shows unto Your Honor and unto the Court:

First.

That he is over the age of Twenty-One years and has been
a bona fide resident citizen of the County of Baldwin and State
of Alabama for a period of more than three years.

That Janie Kennedy is over the age of Twenty-one years
and resides in Mobile, Mobile County, Alabama.

Second.

That during the year to-wit: 1909 Orator and the said
Janie Kennedy were married in Mobile County, Alabama, and lived
together as man and wife.

Third.

That the said Janie Kennedy committed the act of adul-
tery with one Mansfield Jones on to-wit: June 1st, 1915, and
Orator alleges that said act of adultery was not committed with
his consent, nor has there been any condonation or connivance
on the part of said Orator.

PRAYER FOR PROCESS.

The premises considered, your Orator respectfully prays
that the said Janie Kennedy be made party respondent to this
complaint by the usual process of this Honorable Court, and that
he be required to demur, plead to or answer the same within the
time and under the pains and penalties as provided by law, or
that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause that Your
Honor will grant unto Orator an absolute divorce from the said
Janie Kennedy and that he may be again allowed to marry.