

Largest Weekly Circulation in South Alabama

Bay Minette, Ala.,

April 12th, 1917

M

William Oliver Youngs

vs

Huldah Augusta Youngs

NOTICE TO NON-RESIDENT

W. C. Beebe, Atty.

THE BALDWIN TIMES

ABNER J. SMITH, PROPR.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

To publishing above Notice to Non-Resident in The Baldwin Times in issues of March 22 and 29th and April 5 and 12th, 1917....	\$3.50
---	--------

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 10 Spring Term, 1917

William Oliver Youngs Complainants

vs.

Huldah Augusta Youngs Defendants

Motion is hereby made for a Decree Pro Confesso against Huldah Augusta Youngs

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 14th day of May 1917.

746 Code.

Solicitor.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

William Oliver Youngs

Complainants.

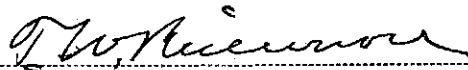
vs.

Huldah Augusta Youngs

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed May 14th 1918



Register.

Recorded in Record,

Vol. Page

Register.

William Oliver
Young &

THE STATE OF ALABAMA,
Baldwin County.

vs.
Heldak Augusta
Young

IN EQUITY,
CIRCUIT COURT OF
Baldwin COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, decree
pro confesso against Heldak Augusta
Young, and testimony of
William Oliver Young, Lewis
Johnson and Joseph Hoffman
witnesses for Complainant

and in behalf of Defendant upon

No. 10

THE STATE OF ALABAMA,

Baldwin County.

IN EQUITY,
CIRCUIT COURT OF

Baldwin COUNTY.

William Oliver Young

vs.

Hudson August Young

NOTE OF TESTIMONY.

Filed in Open Court this 29

day of May 1917

T. M. Nicholson

Register.

CIRCUIT COURT, IN EQUITY.

THE STATE OF ALABAMA,

Baldwin }
County.

No. 14

Term, 1917

William Oliver Young } Complainant
vs.

Huldah Augusta Young } Defendant

To T. W. Richardson, 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 Richardly Arestue & Bebe 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.

Richardly Arestue & Bebe
Solicitors for Complainant.

No. 10 Page

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

William Oliver Young

vs.

Hudson Augusta Young

REQUEST FOR DECREE IN
VACATION.

Filed May 29 1917

J. W. Nicolson

Register.

Recorded in Record

Vol. Page

Register.

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

William Oliver Youngs,

vs

Huldah Augusta Youngs,

Circuit Court in Equity

Notice to Non-Resident.

William Oliver Youngs vs. Huldah Augusta Youngs. The State of Alabama, Baldwin County. Circuit Court, in Equity. No. 10. This the 22nd day of March, 1917.

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. C. Beebe, Attorney for Complainant, that the Defendant Huldah Augusta Youngs, is a non-resident of the State of Alabama and whose address is unknown to Affiant, and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Huldah Augusta Youngs, to answer or demur to the Bill of Complaint in this cause by the 21st day of April, 1917, or after thirty days therefrom a decree Pro Confesso may be taken against her.
T. W. Richerson, Register.

5-4t

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<u>March 22nd, 1917</u>	Vol.	<u>28</u>	No.	<u>5</u>
“ “ second “	<u>March 29th, 1917</u>	Vol.	<u>28</u>	No.	<u>6</u>
“ “ third “	<u>April 5th, 1917</u>	Vol.	<u>28</u>	No.	<u>7</u>
“ “ fourth “	<u>April 12th, 1917</u>	Vol.	<u>28</u>	No.	<u>8</u>

Subscribed and sworn to before the undersigned

this 14th day of April 1917.

T. W. Richerson
Clerk Circuit Court.

Abner J. Smith
Publisher.

Filed 4/14/97
D. V. Rice
Clerk

~~Agency
Communications~~

~~Agency
Communications~~

~~Agency
Communications~~

COONEY, FOLEY, ALABAMA.
Real Estate Notary Public

William Oliver Youngs)
v s)
Hulda August Youngs)
Depositions }

Mr. T. W. Richerson, Clerk
Bay Minette,
Alabama,

Handwritten:
H. W. Richerson
Notary Public
Bay Minette

THE STATE OF ALABAMA,

Baldwin County.

No. 10 CIRCUIT COURT, IN EQUITY.

William Oliver Youngs Complainant

vs. Suddah Augusta Youngs Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso

and testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in his

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 the said

William Oliver Youngs is forever divorced from the said

Suddah Augusta Youngs for and on account of

Abandonment

as alleged in said Bill of Complaint;

It is further ordered, that the said William Oliver Youngs be, and he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Suddah Augusta Youngs pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said William Oliver Youngs

It is further ordered, adjudged and decreed that said William Oliver Youngs shall not again marry except to said Suddah Augusta Youngs until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Suddah Augusta Youngs during the pendency of said appeal.

This 30th day of May 1917.

A. G. Slaughter Judge of the Circuit Court of Baldwin County, Ala.

THE STATE OF ALABAMA,

County.

CIRCUIT COURT, IN EQUITY.

I, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the day of 19, in the cause of

vs.

Complainant Defendant as appears of record in said Court.

Witness my hand and the seal of said Court, this the day of 19

Register.

No. 10

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Baldwin

COUNTY, ALA.

William Oliver Young

vs.

Hulda Augusta Young

DECREE OF DIVORCE.

Filed in office this 3rd

day of July 1917

J. W. Richardson

Register.

E. O. M.

Recorded on minutes

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

Baldwin County. } No. 10. Spring Term, 19 17.

William Oliver Youngs Complainant.

vs. Huldah Augusta Youngs Defendant.

In this cause it appears to the Register that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 22nd day of March 19 17, in the Baldwin Times a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County on the 22 day of March 1917, and that another copy was sent by mail on the day of 19, to

And it now further appearing to the Register T. W. Richerson that the said

Huldah Augusta Youngs

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said

Huldah Augusta Youngs

This 14th day of May 19 17.

T. W. Richerson

Register.

THE STATE OF ALABAMA,
Baldwin County.
CIRCUIT COURT, IN EQUITY.

William Oliver Youngs,

vs.

Huldah Augusta Youngs,

DECREE PRO CONFESSO ON
PUBLICATION.

Issued May 14th 1917

T. W. McCreary
Register.

Recorded in.....Record

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

Register.

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

To Hon. Patrick J Cooney

KNOW YE, That we, having full faith in your prudence and competency, have appointed you Commissioners, and by these presents do authorize you, or any one or more of you, at such time and place as you may appoint, to call before you and examine William Oliver Youngs, Joseph I Laflam, Emma Johnson,

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

William Oliver Youngs is Complainant

and Huldah Augusta Youngs, is Respondent,

on oath to be by you administered, upon interrogatories hereto attached to take and certify the deposition of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 23rd, day of May 19 17.

W. Richardson Register.

DIRECTIONS FOR EXAMINATION OF WITNESSES UPON INTERROGATORIES.

1. If the time and place of executing the Commission are named therein, or in a notice appended thereto, the testimony must be taken at the time and place designated; if no time and place are designated, the Commissioners will call the witness before them at such time and place as they may appoint, and administer to him an oath to speak the truth, the whole truth, and nothing but the truth, in answer to the interrogatories to be propounded to him. The time and place of examining witnesses should be stated in the caption of the deposition.

2. The caption and deposition should be as follows:

THE STATE OF ALABAMA,

County.

Deposition of Richard Howe, a witness sworn (or affirmed, as the case may be) on the day of 19.....
at in said State and County, under and by virtue of a commission issued out of the

Court of in a certain cause therein pending between James Jones, the plaintiff (or complainant), and Samuel Young, defendant (or respondent). The said Richard Howe, being first duly sworn to speak the truth, the whole truth, and nothing but the truth, doth depose and say as follows:

To the first interrogatory he saith: (Here write the answer of the witness as nearly as may be in the language of the witness, using the first person where he uses it).

To the second direct interrogatory he saith: (Write the answer to this interrogatory, and all others, as directed above).

If there are cross or rebutting interrogatories, go through with them in the same manner, thus:

To the first cross interrogatory he saith, etc.

To the second cross interrogatory he saith, etc.

To the first rebutting interrogatory he saith, etc.

Neither party should be permitted to put to the witness, during his examination, any verbal question or suggestion; and if anything of the kind is done by either party, the Commissioner should write it down in the deposition just as it occurred.

The testimony may be written down by any one or more of the Commissioners, by the witness himself, or by any disinterested third party in the presence of the Commissioners, and be read over to the witness if he desire it, and must be subscribed by him.

3. The Commissioners must then add their certificate, as follows:

We, (or I, if only one acts), the undersigned, Commissioners in said commission named, hereby certify that we are not of counsel or of kin to any of the parties to this cause, nor in any manner interested in the result thereof; that we are personally acquainted with said witness, J—K—, and know him to be the identical person named in said commission (or have had proof made before us of the personal identity of the witness, and that he is the identical person named in said commission); that he was sworn and examined as above stated; and that his evidence was taken down, as near as might be, in his own language, and was sub-

scribed by him in our presence on the day of 19....., at the place above stated.

[L. S.]

[L. S.]

E. F.
G. H.
Commissioners.

If the Commissioners are not personally acquainted with the witness, they must have proof made before them that he is the identical person named in the commission, and so certify.

If the witness claims for his attendance, the Commissioners should state in their certificate the number of miles traveled, the number of days the witness attended, ferriage paid, if any, etc.

4. If any exhibits, writings, or papers are produced and used as evidence by the witness, they shall be annexed to the deposition to which they relate, and shall be identified by suitable letters or marks.

If the testimony cannot be taken in one day, the Commissioners, noting the same, may continue from day to day until completed.

5. The Commissioners will fold the depositions, commission, interrogatories, and exhibits, in a packet sealed with three seals. They will write their name or names across each seal, and direct thus:

A B

vs.

C D

Depositions of J K and L M

Mailed the day of 19.....

E. F.

G. H.

To (give name and style of Clerk, Register, or Judge of Probate, as the case may be),

..... County, Alabama.

If sent by private conveyance, should be endorsed: "Forwarded by R A, the day of 19.....
The package must be delivered to the officer to whom it is directed. The person bringing the deposition will be required to take an oath that it has not been opened or altered since he received it.

The Commissioner must return the commission.

No. 10

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

William Oliver Youngs.

Complainant

vs.

Hulda Augusta Youngs.

Defendant

COMMISSION TO TAKE DEPOSITION
ON INTERROGATORIES.

COMMISSIONERS:

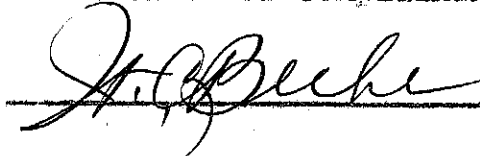
Hon. Patrick J Cooney.

WITNESSES:


William Oliver Youngs.
Joseph I Laflam,
Emma Johnson.

State of Alabama,)
Baldwin County)

Before me Cornelia Hall, a Notary Public and in and for said State and County, this day personally appeared W.C.Beebe, one of the attorneys ~~in the case~~ for complainant in the case of William Oliver Youngs versus Hulda Augusta Youngs now pending on the Chancery side in the Circuit Court of Baldwin County, Alabama, who being by me first duly sworn deposes and says that the answers to the foregoing interrogatories propounded to witnesses William Oliver Youngs, Joseph I. Laflem and Emma Johnson, will be material to the cause of complainant in said cause.

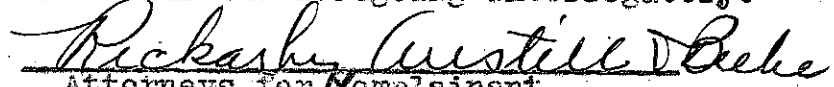


Sworn to and subscribed before me on this the 22nd day of May, 1917.



N.P. Bald. County, Alabama

Complainant suggests Patrick J. Cooney as a suitable person for commissioner to take depositions under the foregoing interrogatory.



Attorneys for complainant.

J. W. Nicholson
Register

STATE OF ALABAMA,)
BALDWIN COUNTY?)

CIRCUIT COURT. IN CHANCERY.

William Oliver Youngs,
complainant

Case # 10

VS

Hulda Augusta Youngs,

Interrogatories propounded by complainants attorneys to William Oliver Youngs, a material witness for complainant in above styled cause:

- 1st, What is your name? Where do you live? How old are you? If you answer that you live at Foley, Alabama, state how long you have lived there? State whether you have lived in this state and County for more than three years continuously next preceeding March 22, 1917.
- 2nd. Do you know Hulda Augusta Youngs? How old is she? Where does she reside? Is she your wife? State when and where you were married.
- 3rd. Are you and she living together as man and wife at this time? If you state that you are not, state where you separated whether you left her or she left you. If you state that she left you at Foley, Baldwin County, Alabama in March 1915, state whether she left voluntarily or was forced to leave by you. Did you give her any cause or excuse ~~for leaving you~~ for leaving you? Have you lived together as husband and wife since March 1915?

Interrogatories propounded to Joseph I. Laflam and Emil Johnson, material witnesses for complainant in above styled cause.

- 1st, What is your name? Where do you reside? Do you know William Oliver Youngs and Hulda Augusta Youngs? Are they man and wife? State where each is now living. Has William Oliver Youngs lived in Baldwin County for three years ~~next~~ continuously next preceeding March 22, 1917? Did Hulda Augusta Youngs leave her husband in Foley in March 1915? Have they lived together as man and wife since? Did he drive her away or did she leave of her own volition?

Richard A. Austell & Beebe
Attorneys for Complainant.

THE STATE OF ALABAMA,

No. _____

Baldwin

County.

CIRCUIT COURT IN EQUITY.

William Oliver Youngs

Complainant

vs.

Hulda. Augusta Youngs

Defendant

DEPOSITION OF William. Augusta Youngs

By virtue of the Commission hereto annexed, issued by the Register for said Court of said County, in the above stated cause pending in said Court of said County,

I, Patrick. J. Cooney the Commissioner named in said Commission,

have called and caused to come before me William. Oliver Youngs

the witness named in the Commission, and having first sworn the said witness to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

First- To the first interrogatory, the witness saith, My name is William. Oliver Youngs: I live at Foley Alabama, my age is 50 yrs I have lived in Foley Alabama, for Three years, I have ~~was~~ lived at Foley for three years next preceeding March 22nd 1917.

Second:- To the second interrogatory, the witness saith I know Hulda. Augusta Youngs, she is 45 years old, I do not know where she resides, She is my wife, We were married in 1891 in Covert Van-Buren County Michigan,

Third- To the third interrogatory, the witness saith: We are not living together at this time, We separated at Foley Alabama, she left me, at Foley Baldwin County in March 1915. She left voluntarily, and was not forced to leave by me, I gave her no cause of excuse for leaving me, We have not lived to gether as man and wife since March 1915.

Subscribed and sworn to before me) this 24th day of May 1917

William Oliver Youngs

Patrick J. Cooney caused to come before me, and having first sworn the said witness to speak the whole truth and nothing but the truth, the said witness deposes and says as follows:

First:- To the first interrogatory, the witness saith:

Deposition of Joseph. I. Laflam, a witness sworn on the 24th day of May 1917 at Foley Alabama in Baldwin County, under and by virtue of a Commission ~~xxxxx~~ annexed issued by the Register of said Court in said County, in the within stated cause now pending in said Court in said County, deposes and answers as follows,

First:- To the first interrogatory the witness saith: my name is Joseph I Lafiam, I reside at Foley Baldwin County Alabama, Yes, I know William Oliver Youngs, and Hulda, Augusta Youngs, As far as I know they are man and wife, William Oliver Youngs now reside at Foley Alabama, I do not know where Hulda Augusta Youngs now reside, Yes William Oliver Youngs has lived in Foley Baldwin County Ala for three years next preceeding March the 22nd 1917, Yes, Hulda Augusta Youngs did leave her husband in Foley in March 1915. No they have not lived together as man and wife since, I do not know whether he drove her away, or if she left on her own volition,

Joseph I Laflam

Subscribed and sworn to before me this 24th day of May 1917,

Tatrick J. Conroy
Commissioner,

Deposition of witness sworn on the 24th day of May 1917 at Foley Baldwin County Alabama by virtue of the annexed Commission issued by the Register of said Court in said County in the with in stated cause pending in said Court in said County,

Emil Johnson of Foley Alabama being duly sworn deposes as follows:

First:- To the first interrogatory the witness saith, My name is Emil Johnson, I reside at Foley Alabama, I know William Oliver Youngs, and Hulda Augusta Youngs, as far as I know they are man and wife, William Oliver Youngs now reside at Foley Alabama, and I do not know where Hulda Augusta Youngs now reside, Yes William Oliver Youngs has lived here for Three years next preceeding March 22nd 1917. Hulda Augusta Youngs left her husband in Foley Alabama in March 1915. No they have not lived together as man and wife since, she left of her own volition

Emil Johnson

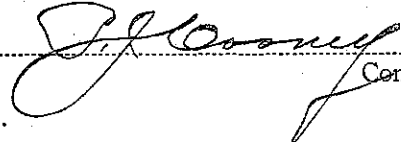
Subscribed and sworn to this 24th day of May 1917

Tatrick J. Conroy
Commissioner

I, Patrick. J. Cooney the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by me in the words of the witness, and were read over to them, that they assented, swore to and subscribed the same in my presence, the 24th day of May 1917, at Foley, Baldwin County Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and that I am not of counsel or of kin to any of the parties to said cause, or in any manner interested in the result thereof.

And I enclose the said Deposition, together with the Commission and Interrogatories, Direct and Cross, and documents which were deposed to, in an envelope properly indorsed and sealed and returned to the Register for said Court of said County.

Given under my hand and seal, this 24th day of May 19 17

 (L. S.)
Commissioner.

WITNESS' FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

Witness <u>William Oliver Youngs</u>	<u>1</u> Days attendance at \$1.50 per day, <u>\$ 1.50</u>
	<u>no</u> Miles traveled at 5 cts. per mile, _____
<u>Emil, Johnson</u>	<u>1</u> Days attendance at \$1.50 per day, <u>1.50</u>
	<u>2</u> Miles traveled at 5 cts. per mile, <u>10</u>
<u>Joseph. I. Laflam</u>	<u>1</u> Days attendance at \$1.50 per day, <u>1.50</u>
	<u>no</u> Miles traveled at 5 cts. per mile, _____
	_____ Days attendance at \$1.50 per day, _____
	_____ Miles traveled at 5 cts. per mile, _____

COMMISSIONER'S FEES.

Commissioner <u>Patrick. J. Cooney</u>	<u>1</u> Days at \$1.50 per day, <u>\$ 1.50</u>
	_____ Words at 20c per 100, <u>5.00</u>
	<u>5.00</u>

No. _____ Page _____

THE STATE OF ALABAMA,

County _____

CIRCUIT COURT, IN EQUITY.

vs.

DEPOSITION TAKEN BEFORE
COMMISSIONER

DEPOSITION OF

for _____

Filed _____

19 _____

Published by order of Court,

19 _____

Register _____

State of Alabama,)
Baldwin County)

Before me Cornelia Hall, a Notary Public and in and for said State and County, this day personally appeared W.C.Beebe, one of the attorneys ~~xxxxxxx~~ for complainant in the case of William Oliver Youngs versus Hulda Augusta Youngs now pending on the Chancery said in the Circuit Court of Baldwin County, Alabama, who being by me first duly sworn deposes and says that the answers to the foregoing interrogatories propounded to witnesses William Oliver Youngs, Joseph I. Lafflem and Emma Johnson, will be material to the cause of complainant in said cause.

W.C. Beebe

Sworn to and subscribed before me on this the 22nd day of May, 1917.

Cornelia Hall.
N.P. Bald. County, Alabama

Complainant suggests Patrick J. Cooney as a suitable person for commissioner to take depositions under the foregoing interrogatory.

Rickaby Austin & Beebe
Attorneys for complainant.

Filed 5/23/917

T. W. Rice
[Signature]

No. 10

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

William Oliver Young

vs.

Mildah Augusta Young.

Decree Term, 19

\$

Rickard Austin Beebe
Complainant's Solicitor.

William Oliver Youngs

THE STATE OF ALABAMA,
Baldwin COUNTY.

vs.

CIRCUIT COURT, IN EQUITY.

Huldah Augusta Youngs.

This the 22nd day of
March 1917

In this cause it being made to appear to the Clerk of this Court by the affidavit of

W.C. Beeben, Attorney for Complainant.

that the Defendant

Huldah Augusta Youngs,

is a non-resident of the State of Alabama and whose address is unknown to Affiant,

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is,

therefore, ordered that publication be made in the Baldwin Times,

a newspaper published in the Bay Minette, Baldwin County, Alabama, once a week for four

consecutive weeks, requiring the said Huldah Augusta Youngs,

to answer or demur to the Bill of Complaint in this cause by the 21st day of April

1917, or after thirty days therefrom a decree Pro Confesso may be taken against her

T. W. Ricerson

Register.

Copy

No. 10

THE STATE OF ALABAMA,

Baldwin County,

CIRCUIT COURT, IN EQUITY.

NOTICE TO NON-RESIDENT.

William Oliver Young,

vs.

Hedda Augusta Young,

Filed in office this 22 day of

Mar 1917.

T. M. Hillman

Register.

William Oliver Young

Complainant.....

vs.

Huldah Augusta Young

Defendant.....

IN EQUITY,
CIRCUIT COURT OF

Baldwin COUNTY.

THE STATE OF ALABAMA,

Baldwin County.

Personally appeared before me, T. W. Richerson Register of said Court,

in and for said County and State, W. C. Beebe Attorney
for Complainant

agent of Complainant....., who being duly sworn, deposes and says that he is informed and verily believes that

Huldah Augusta Young

the Defendant..... in the above stated cause..... is a non-resident..... of the State of Alabama, and the address of

Defendant..... cannot be ascertained after reasonable effort.....

and that said Defendant..... is....., in belief of affiant, over twenty-one years of age.

W. C. Beebe

Sworn to and subscribed before me, this ~~22~~²⁷ day of March 1917

T. W. Richerson
Register.

No.

AFFIDAVIT OF NON-RESIDENCE.

THE STATE OF ALABAMA,

.....*County.*

CIRCUIT COURT, IN EQUITY.

vs.

Filed in office.....day of

19.....

Register.

to make and enter a decree forever dissolving the bonds of matrimony existing between orator and defendant; that orator be allowed to again contract marriage; and that he may have such other, further or different relief as in equity he may be entitled to under the premises.

Richarby, Austell & Beebe
Solicitors for Orator.

Foot Note:

The defendant is required to answer all the allegations of the foregoing bill of complaint, paragraphs FIRST to THIRD, inclusive, but not under oath, her oath is hereby expressly waived.

Richarby, Austell & Beebe
Solicitors for Orator.

State of Alabama,)
Baldwin County.)

Before me, T.W. Richerson, Clerk of Circuit Court in and for said State and County, personally appeared W.C. Beebe, who being by me duly sworn, and says that he is Solicitor for the orator in the foregoing bill of William Oliver Youngs versus Huldah Augusta Youngs, this day filed in the Circuit Court of said County; that he has read the said bill and knows the contents thereof and that the allegations therein contained are true.

W.C. Beebe

Sworn to and subscribed before me this the 22nd day of March, 1917.

T.W. Richerson
Clerk Circuit Court, Baldwin Co. Ala.

Filed 3/22/97
T. W. Richmond
Register

STATE OF ALABAMA.) IN THE CIRCUIT COURT FOR SAID COUNTY.
BALDWIN COUNTY.) EQUITY SIDE.

TO THE HONORABLE A.E.GAMBLE, JUDGE OF SAID COURT,
IN CHANCERY SITTING:

Your orator, William Oliver Youngs, humbly complaining against Huldah Augusta Youngs, respectfully represents unto your Honor as follows:

FIRST.

Orator and defendant are each over the age of twenty-one years; orator is a resident of Foley, in the County of Baldwin and State of Alabama, and has resided in said State and County for more than three years continuously next preceeding the filing of this his bill of complaint; the residence of the defendant, Huldah Augusta Youngs, is unknown to your orator, but your orator is informed and believes and upon such information and belief charges the fact to be that she is a non-resident of the State of Alabama; her particular address is unknown to orator.

SECOND.

Orator and defendant are husband and wife, having intermarried in Van Buren County, Michigan, in the year 1891.

THIRD.

Defendant voluntarily abandoned orator, without fault on his part, on to-wit: March, 2nd, 1915, at Foley, Alabama, and since said date orator and defendant have not lived together as husband and wife.

WHEREFORE, orator prays this Honorable Court will take jurisdiction of this cause; that said Huldah Augusta Youngs be made a party to this bill and by appropriate process be required to answer, plead or demur to this bill within the time and under the penalties prescribed by law and the practice of this Honorable Court; that upon the final hearing of the cause, it may please