

2396

IDUMA LEE MORRIS,

Complainant,

-vs-

R. C. MORRIS,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the respondent in the above-styled cause and accepts service of a Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, respondent says:

1. He admits the allegations contained in Paragraph 1 of said Bill of Complaint.

2. He admits the allegations contained in Paragraph 2 of said Bill of Complaint.

3. He admits the allegations contained in Paragraph 4 of said Bill of Complaint.

4. He admits the allegations contained in Paragraph 5 of said Bill of Complaint.

5. He denies each and every allegation contained in Paragraph 3 of said Bill of Complaint and demands strict proof thereof.

R. C. Morris

Respondent

Sworn to and subscribed before me,  
a Notary Public, on this the 30  
day of August, 1949.

[Signature]  
Notary Public

IDUMA LEE MORRIS,

Complainant,

-vs-

R. C. MORRIS,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your complainant, Iduma Lee Morris, respectfully represents  
and shows unto your Honor:-

1. That complainant is over the age of twenty-one years and  
is a resident of said State and County, and has been a bona fide  
resident of said State for more than one year next preceding the  
filing of this Bill of Complaint; that R. C. Morris is over the age  
of twenty-one years and is a non-resident of the State of Alabama,  
his last known post office address being Forest, Mississippi.

2. That your complainant and respondent were lawfully mar-  
ried on or about, to-wit, March 27, 1947.

3. The complainant further alleges and avers that said  
respondent has been guilty of adultery with divers parties and per-  
sons whose names to your complainant are unknown.

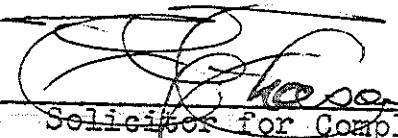
4. Complainant avers that there was born to your complainant  
and respondent one child, Ronald Charles Morris, age~~x~~ two and one-  
half months, which said child is in the custody and control of your  
complainant.

5. Complainant avers that the respondent is gainfully em-  
ployed and is financially able to pay a reasonable attorney's fee  
for complainant's attorney in this case, which said fee complainant  
alleges to be One Hundred Dollars (\$100.00), and to pay a reasonable  
sum for support of said child, which said sum complainant alleges to  
be Thirty Dollars (\$30.00) per month.

PRAYER FOR PROCESS AND RELIEF

The Premises Considered: The complainant makes the said  
R. C. Morris a party respondent to this Bill of Complaint, and in  
order that complainant may have the relief herein prayed, may it  
please your Honor to cause the State's writ of subpoena to be issued  
directed to the said R. C. Morris, commanding him to answer, plead

or demur to this Bill of Complaint within the time required by law, and that service of said summons and complaint be had upon said respondent by registered mail, with return receipt demanded, sent postage prepaid, and addressed to the respondent at his last known post office address as the same herein appears; that upon a final hearing of this cause that your Honor will enter a decree divorcing your complainant from said respondent and granting to the complainant custody and control of the said minor child, Ronald Charles Morris; that she be allowed and granted the sum of \$30.00 per month as maintenance and support of said minor child and that she be allowed and granted the sum of \$100.00 as attorney's fee for her said attorney, and that your Honor will grant such other, further and different relief as may seem just and proper as your complainant will in duty bound ever pray.

  
Solicitor for Complainant

IDUMA LEE MORRIS

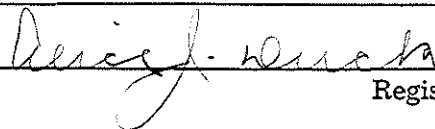
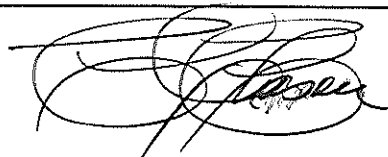
vs.

R. C. MORRIS

THE STATE OF ALABAMA  
Baldwin CountyIN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, \_\_\_\_\_  
and Testimony of Iduma Lee Morris and William Grey Moore

and in behalf of Defendant upon answer and waiver



Register.

No. ....

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

**IN EQUITY**  
**Circuit Court of Baldwin County**

**EDUMA LEE MORRIS**

vs.

**R. C. MORRIS**

**NOTE OF TESTIMONY**

Filed in Open Court this 12<sup>th</sup> .....

day of Sept, 1949 .....

W. J. Rouch  
Register.

Printed By The Baldwin Times

## The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

IDUMA LEE MORRIS, Complainant

vs.

R. C. MORRIS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~XXXXXX XXXX XXXX~~  
~~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 here-  
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and  
that the said Iduma Lee Morris is forever divorced from the  
said R. C. Morris for and on account of Adultery

IT IS FURTHER ORDERED that the care, custody and control of the  
minor child of the marriage, namely Ronald Charles Morris, is  
awarded to Iduma Lee Morris, the complainant, and ~~7.40~~ 7.40 Dollars  
~~50.00~~ 50.00 (~~\$20.00~~) per month is hereby awarded and allowed for support and  
maintenance of said minor child which said sum is to be paid monthly  
by the respondent.

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 R. C. Morris  
the respondent pay the cost herein to be taxed, for which execution may issue.

This 12<sup>th</sup> day of September, 1949

Jefair J. Mathis  
Judge Circuit Court, In Equity

I, \_\_\_\_\_ 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 de-  
cree is on file and enrolled in my office.

Witness my hand and seal this the \_\_\_\_\_ day  
of \_\_\_\_\_, 19\_\_\_\_\_

\_\_\_\_\_  
Register of Circuit Court, In Equity.

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

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

IDUMA LEE MORRIS

Complainant

vs.

R. C. MORRIS

Respondent

DIVORCE DECREE

FILED  
SEP 13 1949  
112  
ALICE J. DUCK, Register

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Lorna Underwood

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 Iduma Lee Morris and William Grey  
Moore

as witnesses in behalf of Iduma Lee Morris in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Iduma Lee Morris

is, Complainant  
and R. C. Morris

is Respondent

on oath, to be by you administered, upon them  
to take and certify the depositions of the witness es and return the same to our Court, with all  
convenient speed, under your hand.

Witness 3rd day of September, 1949

Alice J. Underwood  
Register.

Commissioner's Fee, \$5.00

Witness' Fees, \$

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

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

**CIRCUIT COURT**

**IDUMA LEE MORRIS**

Complainant

**VS.**

**R. C. MORRIS**

Defendant

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

**Lorna Underwood**

**WITNESSES:**

**Iduma Lee Morris**

**William Grey Moore**

THE STATE OF ALABAMA }  
Baldwin County }

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

IDUMA LEE MORRIS COMPLAINANT

vs.

R. C. MORRIS RESPONDENT

I, Lorna Underwood

as Register and Commissioner in chancery

have called and caused to come before me Iduma Lee Morris and William Grey  
Moore

witness es named in the requirement for Oral Examination, on the 6th day of September  
1949, at the office of C. G. Chason  
in Foley, Alabama, and having first sworn said witness es to speak the  
truth, the whole truth, and nothing but the truth, the said Iduma Lee Morris and

William Grey Moore doth depose and say as follows:

TESTIMONY OF IDUMA LEE MORRIS:

My name is Iduma Lee Morris; I am over the age of twenty-one years and a resident of Bon Secour, Baldwin County, Alabama, having been a bona fide resident for over one year; I was married to R. C. Morris on the 27th day of March, 1947; In the last of October of 1948 my husband left our home and went to Memphis, Tennessee, and told me that he was going after Flossie Mae Kelch, and told me that he was going to bring her back and his baby which had been born to them. He also told me that I might as well leave, that he was going to live with her. About two days later he came back with her and the baby and registered in a tourist camp. I found out about him being back and where he had taken her and went to the tourist camp and found that he had registered for them as husband and wife. This was on Sunday night. I left our home on Monday morning and went to my Aunt's home. On Wednesday following, this being about the 28th day of November, 1948, I went back to my house at about 6 o'clock in the evening. My husband and this woman were moving my furniture out of the house into another house and were moving her things into my house. I went back to my Aunt's and stayed until about the 8th or 9th of December. My brother who is in the Merchant Marine came to my Aunt's and took me back to my home. We got there about 11 o'clock at night. I knocked on the door and called my husband. When I called he turned on the light in the bedroom and all the shades were up and my brother and I could see clearly. He and this woman were in bed together. He ask me what I wanted and I told him that I wanted my clothes which were still in the house but he would not let me go in. I have never been back to the house since that time, nor have I gotten my clothes, nor have I lived with my husband since the 18th of November, 1948, this being the time that he first brought this woman to the house. I believe that my husband and this woman, and this baby that he says is his, are still living together as husband and wife. My husband is now employed by the Illinois Central Railroad as a lineman and receives approximately \$420.00 per month after all deductions are made. There was born to my husband and I

(over)

I, Lorna Underwood 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 es and read over to them and they signed the same in the presence of my-  
self and \_\_\_\_\_  
at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proof made before me of the identity of said witness es; 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 6th day of September 1949.

Lorna Underwood (L. S.)

No. _____	Page _____
THE STATE OF ALABAMA, BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
IDUMA LEE MORRIS COMPLAINANT	
vs. R. C. MORRIS	
RESPONDENT	
ORAL DEPOSITION	
Filed <u>9-12</u> , 194 <u>9</u>	
<u>Reig. L. Underwood</u> Register.	
RECORDED IN _____	
Record _____	
Vol. _____	Page _____
_____, Register	

23410