

No. 25

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Ada Elmore ~~Proctor~~

vs. Complainant,

Samuel H. ~~Proctor~~

Defendant.

INTERROGATORIES TO

Filed

6/27 1917

J. W. ~~Proctor~~

Register.

Richardby Antell V. Bay

Solicitor.

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Ada Elmore Mothershed,)
Complainant.)
VS.)
Simuel H. Mothershed,)
Defendant.)

Circuit Court, Baldwin County, Alabama.
In Chancery.

Interrogatories propounded by Complainant's attorney to Ada Elmore Mothershed, Annie Belle Store and Emma Stone, material witnesses for complainant in above styled cause.

TO ADA ELMORE MOTHERSHED:

1st. What is your name? How old are you? Where do you live? Have you lived in Baldwin County, State of Alabama, continuously next preceeding this date for three years. Do you know Simuel H. Mothershed? Is he your Husband? How old is he? Where does he live?

2nd. Where did you live in December 1914. Did Simuel H. Mothershed abandon you in that place in December 1914? Was his abandonment voluntarily? Did you give him any excuse or reason for leaving you?

To ESTELLE ATWELL and EMMA STONE:

1st. Do you know Ada Elmore Mothershed and Simuel H. Mothershed? Are they man and wife? When did they marry? How old is each? Where do they live? Has Ada Elmore Mothershed lived in Baldwin County, Alabama, for the last three years or more continuously?

2nd. Did Simuel H. Mothershed abandon Ada Elmore Mothershed in Alabama in December 1914? Have they lived together as husband and wife since that time? Did she give him any cause or excuse for leaving her?

Rickaby Atwell Beebe
Attorneys for Complainant.

State of Alabama,)
Baldwin County.)

Before me Cornelia Hall, a notary public in and for said County and State, this day personally appeared W.C. Beebe, one of the Attorneys for Complainant in the cause of Ada Elmore Mothershed versus Simuel H. Mothershed, pending in Circuit Court of Baldwin County, Alabama, in Chancery, who being duly sworn deposes and says that the answers to the foregoing questions propounded to witnesses above named will be material to the cause of the said complainant.

W.C. Beebe

Sworn to and subscribed before me this the 2nd day of June, 1917.

Cornelia Hall
N.P. Baldwin County, Alabama.

Complainant suggests T.W. Richerson, Register, as a suitable person to take evidence of said witnesses under above interrogatories.

Rickaby Atwell Beebe
Attorneys for complainant.

No. 23-

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Alta Elmore Hollingsworth

Complainant

vs.

Samuel H. Hollingsworth

Defendant

ANSWER.

Answer of

Filed 6/2 1917

Prothonotary

Register.

Reckard C. White

Solicitor.

Ada Elmore Mothershed,
Complainant.

NO. 21-

VS.

In Circuit Court of Baldwin County, Alabama.

Simuel H. Mothershed,
Defendant.

IN Chancery.

Comes Simuel H. Mothershed, named as defendant in the above styled cause, and for answer denies each and every allegation of the bill of complaint paragraph First to Three, inclusive, and demands strict proof of same. He waives service by the sheriff of subpoena and other process on said bill, notice of filing of interrogatories or of process to take testimony on oral examination as well as right to cross examine witnesses or cross interrogatories and consents that this cause be submitted for decree on note of testimony made by the Register either in term time or in vacation.

Simuel H. Mothershed
Respondent.

State of Alabama,)
Baldwin County.)

Before me, W.C. Beebe, a notary public in and for said State and County, personally appeared this day Simuel H. Mothershed, who is known to me and known to me to be the respondent in the above styled cause, and acknowledged before me that being informed of the contents of the bill of complaint in said cause, he signed the foregoing answer voluntarily this day in my presence.

Given under my hand this 2nd day of June, 1917.

W.C. Beebe
N.P. Baldwin County, Alabama.

No. 25

THE STATE OF ALABAMA,

County.

CIRCUIT COURT, IN EQUITY.

COUNTY, ALA.

vs.

DECREE OF DIVORCE.

Filed in office this 5th

day of June 1917

T. H. Richardson
Register.

E. O. M.

Recorded on minutes

THE STATE OF ALABAMA,

No.

Baldwin

County. }

CIRCUIT COURT IN EQUITY.

Ada Elmore Mothershed

Complainant

vs.

Simuel H. Mothershed

Defendant

DEPOSITION OF Estelle Atwell

By virtue of the appointment to take the Deposition, indorsed in writing on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County,

I, T.W. Richerson Register of said Court of said County,

have called and caused to come before me Estelle Atwell

the witness named in the Interrogatories, 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:

To interrogatory 1st witness answers:

My name is Estelle Atwell. I know Ada Elmore Mothershed and Simuel H. Mothershed. They are husband and wife. They married in July 1911 in the State of Florida. Ada is twenty-two and he is twenty-nine years old. They live in Baldwin County, Alabama. She has lived in this State for the last three years continuously.

To interrogatory 2nd she says:

He left her in Aymore, Alabama, in December 1914 and they have not lived together as man and wife since. He left her voluntarily and I know of no cause or excuse she gave him to leave.

Estelle Atwell.

THE STATE OF ALABAMA,

County.
CIRCUIT COURT, IN EQUITY.

vs.

DEPOSITION TAKEN BEFORE
REGISTER

DEPOSITION OF
Esther Atwell

for _____

Filed 6/2 1917

Published by order of Court,

19_____

Register.

I, T. W. Beckman the said Register, hereby certify that the foregoing testimony was taken down in writing by Myself in the words of the witness, and were read over to her, that she assented, swore to and subscribed the same in my presence the 2nd day of June 1917, at 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 Interrogatories, Direct and Cross, and documents which were deposited to, in an envelope properly indorsed and sealed and placed the same on file in my office.

Given under my hand and seal, this 2nd day of June 1917
T. W. Beckman (L. S.)
Register.

WITNESS' FEES.

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

Witness _____
Days attendance at \$1.50 per day, \$ _____
Miles traveled at 5 cts. per mile, _____
Days attendance at \$1.50 per day, _____
Miles traveled at 5 cts. per mile, _____
Days attendance at \$1.50 per day, _____
Miles traveled at 5 cts. per mile, _____
Days attendance at \$1.50 per day, _____
Miles traveled at 5 cts. per mile, _____
Days attendance at \$1.50 per day, _____
Miles traveled at 5 cts. per mile, _____

REGISTER'S FEES

Register _____
Days at \$1.50 per day, \$ _____
Words at 20c per 100, _____

THE STATE OF ALABAMA,

No.

Baldwin

County.

CIRCUIT COURT IN EQUITY.

Ada Elmore Mothershed

Complainant

VS.

Simuel H. Mothershed

Defendant

DEPOSITION OF Emma Stone

By virtue of the appointment to take the Deposition, indorsed in writing on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County,

I, T.W. Richerson Register of said Court of said County,

have called and caused to come before me, Emma Stone

the witness named in the Interrogatories, 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:

In answer to interrogatory witness answers:

My name is Emma Stone. I know Ada Mothershed and Simuel H. Mothershed and have known them for ten years or more. They are man and wife having married in Florida in July 1911.

Ada Elmore Mothershed is twenty-two years old. They both live in Baldwin County, Alabama. Ada Elmore Mothershed has lived continuously for more than three years just previously to this date.

To interrogatory 2nd she says:

Simuel H. Mothershed left Ada Elmore Mothershed in Atmore, Alabama, in December 1914 and they have not lived together as husband and wife since that time. He left her of his own accord. She did not give him any cause or excuse for leaving her.

Emma Stone

I, D. W. Richardson the said Register, hereby certify that the foregoing testimony was taken down in writing by Myself in the words of the witness, and were read over to her, that she assented, swore to and subscribed the same in my presence, the 2nd day of June 1917, at Bay Minette 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 Interrogatories, Direct and Cross, and documents which were deposed to, in an envelope properly indorsed and sealed and placed the same on file in my office.

Given under my hand and seal, this 2nd day of June 1917
D. W. Richardson (L. S.)
Register.

WITNESS' FEES.

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

Witness.....	Days attendance at \$1.50 per day, \$.....
	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
	Miles traveled at 5 cts. per mile,

REGISTER'S FEES.

Register	Days at \$1.50 per day,	\$.....
	Words at 20c per 100,

No.	Page
THE STATE OF ALABAMA,	
County.	
CIRCUIT COURT, IN EQUITY.	
vs.	
DEPOSITION TAKEN BEFORE REGISTER	
DEPOSITION OF <u>Anna R. Rouse</u>	
for	19 <u>17</u>
Filed <u>6/22</u>	19 <u>17</u>
Published by order of Court,	
Register.	

THE STATE OF ALABAMA,
Baldwin County.

No.

CIRCUIT COURT IN EQUITY.

Ada Elmore Mothershed

vs.

Complainant

Simuel H. Mothershed

Defendant

DEPOSITION OF Ada Elmore Mothershed

By virtue of the appointment to take the Deposition, indorsed in writing on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County,

I, T.W. Richerson Register of said Court of said County,

have called and caused to come before me Ada Elmore Mothershed

the witness named in the Interrogatories, 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:

In answer to interrogatory 1st witness says:

My name is Ada Elmore Mothershed. I am twenty-two years old.

I live in Baldwin County, Alabama, at BayMinette. I have

lived in ~~this~~ ^{this} State continuously for more than

three ~~years~~ years next preceeding this date. I know Simuel

H. Mothershed. He is ~~my~~ my husband. He is twenty-nine years

old. He lives in Baldwin County, Alabama, near BayMinette.

To 2nd interrogatory witnesses answers:

I was living at Atmore in December 1914. Simuel H. Mothershed voluntarily abandoned me at Atmore, Alabama, in December 1914.

His leaving me was voluntarily. I did not give him any cause or excuse for leaving me. Since that time we have not lived together as husband and wife.

Ada Elmore Mothershed

I, T. W. Reimerson the said Register, hereby certify that the foregoing testimony was taken down in writing by me in the words of the witness, and were read over to her, that she assented, swore to and subscribed the same in my presence, the 2nd day of June 1917, at Bay Minneter 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 Interrogatories, Direct and Cross, and documents which were deposed to, in an envelope properly indorsed and sealed and placed the same on file in my office.

Given under my hand and seal, this 2nd day of June 1917
T. W. Reimerson (L. S.)
Register.

WITNESS' FEES.

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

Witness.....	Days attendance at \$1.50 per day, \$.....
	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
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.....	Days attendance at \$1.50 per day,
	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
	Miles traveled at 5 cts. per mile,

REGISTER'S FEES.

Register	Days at \$1.50 per day, \$.....
	Words at 20c per 100,

No. Page

THE STATE OF ALABAMA,

County.

CIRCUIT COURT, IN EQUITY.

vs.

DEPOSITION TAKEN BEFORE
REGISTER

DEPOSITION OF

Calvin E. Edwards

for

Filed 6/22 1917

Published by order of Court,

19

Register.