THE STATE OF ALABAMA,

Baldevin County

CINCUIT COURT, IN EQUITY.

Ada Elmone trochurens

vs. Complainant,

Derruel H troclumbed

Defendant.

INTERROGATORIES TO

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FOR SALE BY GEO. D. BARNARD & CO., ST. LOUIS

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Ada Emore Mothershed,)
Complainant.) Simuel H. Mothershed,

Defendant.

Circuit Court, Baldwin County, Alabama. In Chancery.

Interrogatories propounded by Complainant's attorney to Ada Elmore morthershed, Annie Belle Store and Emmasstonece, material witnesses for complainant in above styled cause.
TO ADA ELMORE MOTHERSHED:

Ist. What iseyour name? How old are you? Where do you live? Have you lived in Baldwin County, State of Alabama, continuously next preceding this date for three years. Do you know Simuel H. Mothershed? Is he you Humband? 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

TO ESTEDIE ATWELL and EMMASTONEFOE: 1st. Do you know Ada Elmore Mothershed and Simuel H. Mothershed? Are they man and wife? When did they marry? How ofld is each? Where do they live? Has Ada Emore Mothershed lived in Alabama, for the last three years or more continuousty?

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

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 propunded to witnesses above named will be material to the cause of the said complainant.

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

N.P.Baldwin County, Alabama.

Complainant suggests T.W.Richerson, Register, as a suitable person

to take evidence of said witnesses under above interrogatories.

Attorneys for complainant.

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No. 2 3
THE STATE OF ALABAMA, Dalling County.
CIRCUIT COURT, IN EQUITY.
acla Elmon hevelene
Complainant vs. Complainant
Defendant
ANSWER.
Answer of
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Register. Register.

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FOR SALE BY GEO. D. BARNARD & CO., ST. LOUIS. 8

Ada Elmore Mothershed, Complainant.

NO. 2 / -

VS.

In Circuit Court of Baldwin County, Alabama.

Simuel E. 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 paragrapgh First to Three, inclusive, and demands strict proof of same. He waives service by the shetiff of supposna and other process on said bull, 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.

State of Alabama, Baldwin County.

Before me, W.C.Beebe, a notary publicin 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 woulntarily this day in my presence.

Given under my hand this me 2rd day of June, 1977.

THE STATE OF ALABAMA, \mathcal{N}_{α}	
Baldwin County.	CIRCUIT COURT, IN EQUITY.
Ada Elmere Methershe	.8
vs.	Complainant
Simuel H. Mothershed	Defendant
	7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7 7
This cause, coming on to be heard at this Term, was submitt	
and testimony as noted by the Register; and, upon consideration	thereof, the Court is of opinion that the Com-
plainant is entitled to the relief prayed for inher	
	said bill.
IT IS, THEREFORE, Ordered, adjudged and decreed by	the Court, that the bonds of matrimony hereto-
fore existing between the Complainant and Defendant be, and th	he same are hereby dissolved, and the said
Ada Elmore Mothershed	is forever divorced from the said
Simuel H. Mothershed	for and on account of
Voluntary abandonment	
	as alleged in said Bill of Complaint;
It is further ordered, that the said Ada Elmore Moth	ershed and Simuel H.Mothershed
be, and	on the payment of the costs of Court in this cause.
It is further ordered, that the said Simuel H. Mother	shed
pay the costs herein taxed, for which execution may issue, and if	
then execution for such costs may issue against the said. Ads	
It is further ordered, adjudged and decreed that said	da Elmore Mothershed
shall not again marry except to said. Simuel H. Mothersh	
until sixty days after this date, and that if an appeal is taken w	
• -	
to saidSimuel H.Methershed	uuring the pendency of suid appear.
This 5 day of June	
This day of June	1917
	endine le
	Judge of the Circuit Court of County, Ala.
THE STATE OF ALABAMA,	CUIT COURT, IN EQUITY.
County.	, our booking in agentus.
<i>I</i> ,	Register of said Circuit Court of said County
Alabama, do hereby certify that the above is a full, true an	
Court on theday of	
	Complainant
vs.	
	Defendant
as appears of record in said Court.	
Witness my hand and the seal of said Court, this the	day of
	Register.

No. 23
THE STATE OF ALABAMA,
County.
CIRCUIT COURT, IN EQUITY.
COUNTY, ALA.
vs.
DECREE OF DIVORCE.
Filed in office this & The
day of Jew 19!7
I Kordielurion Register.
E. O. M
Recorded on humilia

THE STATE OF ALABAMA,	Ĺ	No
Baldwin	County.	CIRCUIT COURT IN EQUITY.
Ads Elmore Mo	thershad vs.	Complainant
6 to a State of State		
		Defendant
DEPOSITION OF ASTELL	e Atwell	
By virtue of the appointment to take	the Deposition	, indorsed in writing on the Interrogatories by th
Solicitor filing the same, in the above state	d cause pendin	g in said Court of said County,
I, T.W.Richerson	•-•	Register of said Court of said County
•	. •	Atwell
	·	
the witness named in the Interrogatories, as truth and nothing but the truth, the said was not interrogatory lst witness	vitness deposes	
My name is Estelle Atwell.		
Simuel H. Mothershed. They		
in July 1911 in the State (of Florida	a. Ada is twenty-two and he
is twenty-nine years old.	They live	e in Baldwin County, Alabama.
She has lived in this State	e for the	last three years continuously.
To interrogatory 2nd she sa	ays:	
He left her in Aymore, Alek	bama, in I	December 1914 and they have not
lived together as man and w	vife since	e. He left her voluntarily
and I know of no cause or	excuse sl	ne gave him to leave.

Estelle Atwell.

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THE STATE OF ALABAMA,	:					1				I her	Give	And d to,	proof 1	word in my	
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CIRCUIT COURT, IN EQUITY.										ertify	ler my	lose th	before any ma	ence,	ony w
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vs.		•					,	\$		iuiakor	eal, th	sition, y indo	ident ident	7 % ere re	down in
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DEPOSITION TÂKEN BEFORE REGISTER						REGIST			*	WITNI	Š	vith the lealed and	witness,	clay of	\sim \mathcal{U}_{x}
DEPOSITION OF				* . *		ER'S I				ESS' F		Interro Lplace	and th	7 7	1/2
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the said Register, hereby certify that the

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THE STATE OF ALABAMA,	No
,	CIRCUIT COURT IN EQUITY.
Ada Elmore Mothershed	vs. Complainant vs.
Simuel H.Mothershed	
	Defendant
DEPOSITION OF Rame Stone	
By virtue of the appointment to take the Deposi	tion, indorsed in writing on the Interrogatories by the
Solicitor filing the same, in the above stated cause per	
	Register of said Court of said County,
pave called and caused to come before me	tone a bod
·	
<u> </u>	
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 dep	oses and says as follows:
In answer to interrogatory witne	ess abswers:
My name is Emma Stone. I know A	da Mothershed and Simuel H.
Mothershed and have known them i	•
are man and wife having married	in krolids in anth tatt.
Ada Elmore Mothershed is twenty-	two years old. They both

To interrogatory 2nd she says:

to this date.

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

live in Baldwin County, Alabama. Ada Elmore Methershed has

lived continuously for more than three years just previously

Emma Stone

	I, Durliemon	the said Register, hereby certify that the
	foregoing testimony was taken down in writing by	
	in the words of the witness, and were read over to that that	assented, swore to and subscribed the
		19/7, at
	Kaymutte C	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	~ / / · · · · · · · · · · · · · · · · ·
	Given under my hand and seal, this 2 ud day of	19
	$\mathcal{I}_{\mathcal{X}}$	Mielword (L, S.)
	•	Register.
	WITNESS' FEES.	
	I hereby certify that the following named witnesses are entitled to	·
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		Miles traveled at 5 cts. per mile,
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		Miles traveled at 5 cts. per mile,
		Days attendance at \$1.50 per day,
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	REGISTER'S FEES.	
	Register,	Days at \$1.50 per day, \$
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THE STATE OF ALABAMA, No
Baldwin County. County. CIRCUIT COURT IN EQUITY.
Ada Elmore Mothershed vs. Complainant
Simpol W Mathemater
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, Register of said Court of said County
have called and caused to come before me. Ads Elmere Mothershed
the mile
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 intonne
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 state continuously for more than
threexjant years next preceding this date. I know Simuel
M.Mothershed. He is yes my husband. He is twenty-nine years
old. He lives in Baldwin County, Alabama, near BayMinette.
To 2nd interrogatery witnesses answers:
I was living at Atmore in December 1914. Simuel H. Mothershed
voluntarily abandoned me at Atmore, Alabama, in December1914.
His leaving me was voluntarily. I did not give him ang
cause or excuse for leaving me. Since that time we have not
ived together as husband and wife.

Ada. Elmortfathersheed.

1, IW Nedurson	the said Register, hereby certify that the
rotegoing testimony was taken down in writing by.	
in the words of the witness, and were read over to that	the assented swore to and subscribed the
same in my presence, the day of	1017 at
Bayande	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, deposed to, in an envelope properly indorsed and sealed and placed the same	
Given under my hand and seal, this 2 well day of	to on the in invomee.
	11/12
	Mecuron (L. S.) Register.
WITNESS' FEES.	
I hereby certify that the following named witnesses are entitled to t	
Witness	
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