

THE STATE OF ALABAMA,

Baldwin

County.

No. 30

CIRCUIT COURT IN EQUITY.

George E. Pierce

Complainant.....

vs.

Sallie Pierce

Defendant.....

Motion is hereby made for a Decree Pro Confesso against Sallie Pierce

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..... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23rd day of July 19 27

S. Jenkins

Solicitor.

No. 30.....

Page.....

THE STATE OF ALABAMA,

Baldwin

County,

CIRCUIT COURT, IN EQUITY.

George E Pierce

vs.

Sallie Pierce

MOTION FOR DECREE
PRO CONFESSO ON
PERSONAL SERVICE.

Filed..... July 23rd..... 19 17

J. W. Rice

Register.

Recorded in..... Record

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

Register.

CIRCUIT COURT, IN EQUITY.

THE STATE OF ALABAMA,

Baldwin County.

No. Fall Term, 1917

George E. Pierce Complainant

vs.

Sallie Pierce 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 S Jenkins 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.

S Jenkins Solicitors for Complainant

No. 30 Page.....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

George E. Pierce

vs.

Maie Pierce

REQUEST FOR DECREE IN
VACATION.

Filed 8/18 1917

T. W. Richardson
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 Sallie Pierce

of Escambia 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

George B Pierce

against said

Sallie Pierce,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant 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 19th day of June,

1917



Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

Original

Serve on Sallie Pierce, Near Atmore, Ala. THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No. 30.

SUMMONS.

George E Pierce.

vs.

Sallie Pierce.

S.C. Jenkins.

Solicitor for Complainant.

Received in office this.....

day of 191.....

Sheriff.

Executed this 22 day of

June 1917

by leaving a copy of the within Summons with

Sallie Pierce

Defendant

J.P. Kelly

Sheriff

By

J.C. Weaver

Deputy Sheriff.

THE STATE OF ALABAMA,

No. 30

Baldwin

County.

CIRCUIT COURT IN EQUITY.

George E. Pierce

Complainant

vs.

Sallie Pierce..

Defendant

DEPOSITION OF George E. Pierce,

On oral examination

By ~~George E. Pierce~~ ~~the Commissioner named in said Commission~~ for said Court of said County, in the above stated cause pending in said Court of said County,

I, T.W. Richerson

Richerson

~~the Commissioner named in said Commission~~

have called and caused to come before me George E. Pierce.

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

My name is George E Pierce, I am the Complainant in this cause, I am a bonafide resident of Baldwin County, Alabama, I was born and raised at Point Clear Baldwin County, Ala, I am 64 years of age and have resided in Baldwin County, Ala, all my life . I was married to Sallie Pierce in Bay Minette, Alabama January 10th 1915, on the day we married we went together down to Summerdale, and the next morning she came back to Bay Minette, Ala, without me. and then and there abandoned me and has remained away every since from my bed and board. and has failed and refused and still refuses to resume marital relations with me. and without any fault on my part. she is residing at present in Et or near Lottie in Escambia County, Ala.

We were lawfully married Jan 10th, 1915, by the Probate Judge of Baldwin County, Ala, Hon. J.H.E. Smith under a license procured from his Honor,.

George E. Pierce
his
must

I, T.W. Richerson, Register the said Commissioner hereby certify that the foregoing testimony was taken down in writing by T.W. Richerson, Register in the words of the witness, and were read over to him, that he assented, swore to and subscribed the same in my presence, the 17th, day of August, 19 17, at Bay Minniette 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 17th, day of August, 19 17.

T. W. Richerson (L. S.)
 Commissioner

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,

COMMISSIONER'S FEES.

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

No. 50 Page.....

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

George E. Pierce
 vs.
Sallie Pierce.

DEPOSITION TAKEN BEFORE
 COMMISSIONER
 DEPOSITION OF
George E. Pierce.

for.....

Filed..... 19.....
 Published by order of Court,
 19.....
 Register.

No. 30

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Baldwin

COUNTY, ALA.

George E. Pince

vs.

Sallie Pince

DECREE OF DIVORCE.

Filed in office this 22nd

day of August 1917

G. W. Richardson

Register.

E. O. M.

Recorded On
Minutes

THE STATE OF ALABAMA,
Baldwin

County.

No. 30

CIRCUIT COURT, IN EQUITY.

George F. Pierce

Complainant

vs.

Sellie Pierce.

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso of late July 28rd, 1917 against the defendant Sellie Pierce 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

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

George F. Pierce

is forever divorced from the said

Sellie Pierce

for and on account of

abandonment

as alleged in said Bill of Complaint;

It is further ordered, that the said George E. Pierce

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 George E. Pierce

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

It is further ordered, adjudged and decreed that said George F. Pierce

shall not again marry except to said Sellie Pierce

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Sellie Pierce during the pendency of said appeal.

This 21st day of Aug

1917

W. G. Gaudin
Judge of the Circuit Court of
Baldwin County, Ala.

THE STATE OF ALABAMA,
Baldwin

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.

THE STATE OF ALABAMA,

No. 30

Baldwin County }

CIRCUIT COURT, IN EQUITY.

George E Pierce

Complainant

vs.

Sallie Pierce

Defendant

In this cause it appears to the 22nd day of June 1917,

that a Summons requiring the Defendant Sallie Pierce was issued

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon Sallie Pierce

was served upon her by the Sheriff of Baldwin County, Alabama, on the 22nd, day of June 1917, and the said Defendant having

failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Solicitor for Complainant S.C. Jenkins it is

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 Sallie Pierce

Defendant aforesaid.

This 23rd, day of July 19 17.

T. W. Pickens

Register.

No. 30 Page

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

George E Pierce

vs.

Sallie Pierce

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued July 23rd, 1917.

T. W. Keenan
Register.

Recorded in Record,

Vol. Page

Register.

The State of Alabama, ~~Mobile County~~

George E. Pierce Complainant

Circuit Court in Equity.

No.

Vs

~~Mobile, Ala.~~

Sallie Pierce Defendant

The Complainant by his solicitor

requests the oral examination of the following named witness or

on his behalf, viz: Chas. E. Tubank, O. W. Wilson and himself, the complainant.

said witnesses reside in the County of Baldwin at Bay Minette State of Alabama.

all of whom

who reside at Bay Minette, Ala.

Thos. W. Richardson, The Register In Chancery of this Court,

is appointed

~~is suggested as a suitable person to be appointed~~ Commissioner to take the depositions of said

witness or on such oral examination and under authority of this court without the

issuance of the commission

S. Jenkins

Solicitor for

Complainant

No.

IN CHANCERY

At Mobile, Alabama.

George E. Pierce

Vs.

Cellie Pierce

Demand for Oral Examination

And Appointment of Register as
Commissioner July 25th 1917
Filed.....

July 25-1917

T W Richerson

Register.



The State of Alabama,)
Baldwin County .)

Circuit Court in Equity.

George E. Pierce,
Complainant.

vs Bill for Divorce.

Collie Pierce,
Defendant

To Thos. W. Richerson, Register In Chancery :

You are hereby requested to publish the testimony and make a note of evidence in the above entitled cause, and then to deliver all of the papers in the said cause to the Circuit Judge, sitting in Equity, for a final decree .

Dated this the 18th day of August, 1917.

S. Jenkins

Solicitor for Complainant.

Filed 8/15/917

T. W. Buchanan
Prizant

George E. Pierce

THE STATE OF ALABAMA,
Baldwin County.

vs.

IN EQUITY,
CIRCUIT COURT OF

Sallie Pierce

Baldwin COUNTY.

at

This cause is submitted in behalf of Complainant upon the original Bill of Complaint.....

2nd

Decree are confessed against Sallie Pierce on personal service

3rd

Declarations of Chas. F. Tuberkel and C.W. Wilson and of Complainant

and in behalf of Defendant upon.....

J. W. Rice
Sergeant

No. 30

THE STATE OF ALABAMA,

Barcelon County.

IN EQUITY,

CIRCUIT COURT OF

Barcelon COUNTY,

George E. Paine

vs.

Lucie Paine

NOTE OF TESTIMONY.

Filed in Open Court this

18

day of

Aug

1917

J. W. Paine

Register.

George E. Pierce,)
 Complainant.)
 vs)
 Sallie Pierce,)
 respondent.)

In Circuit Court of Baldwin County,
 Alabama. In Equity.

To Honorable Arthur E. Gamble, Judge of the Circuit Court of Baldwin County, sitting in equity:

The Bill of Complaint of George E. Pierce, exhibited against Sallie pierce, respectfully represents unto your Honor as follows:

That Orator and Sallie Pierce were lawfully married in Baldwin County, - Alabama, on to wit, the 10th day of January, 1915.

That your Orator is now and has been for more than three years next - proceeding the filing of this Bill in this cause a bona fide resident of Baldwin County, Alabama.

That Sallie Pierce, the respondent named herein, has been a bona fide - resident of Escambia County, Alabama, for two years next before the filing of the Bill in this cause.

That your Orator and the respondent herein named are both over the age of twenty one years.

That without legal cause or good excuse, the respondent, Sallie Pierce, on to wit: the 11th day of January, 1915, did abandon the bed and board of your Orator and has remained away for more than two years next before the filing of the Bill in this cause and had failed and refused to resume marital relations - with him and without any fault on his part.

Wherefore your Orator prays: That your Honor will take jurisdiction of the - cause made by this bill and that the said Sallie pierce be made a party defen- - dant to the same and that the said Sallie pierce by appropriate process to be served and issued upon her be made to answer this Bill. And that it may please your Honor on the hearing of said cause to decree that the bonds of matrimony existing between your Orator and Sallie Pierce be dissolved and that your Orator may be permitted to marry again and for such other and further or - different relief as to equity may seem meet and your Orator will ever pray, etc

Note:

The respondent is required to answer *S. J. Gamble*
 all the allegations of the foregoing Solicitor for Complainant.

Bill, but not under oath, her oath is hereby waived.

S. J. Gamble
 Solicitor for Complainant

Sept 19. 1917
G. W. Bessman
Bessman

THE STATE OF ALABAMA, } No. 30
Baldwin County. } CIRCUIT COURT IN EQUITY.

George E. Pierce vs. Complainant

Sallie Pierce. Defendant

DEPOSITION OF C.W. Wilson

On oral examination by the Register for said Court in said County, Ala.

the above stated cause pending in said Court of said County.

I, T.W. Richerson, Register for said Court of said County, do hereby certify that the above is a true and correct copy of the deposition of C.W. Wilson.

the witness named ~~Richard~~ 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:

My name is C.W. Wilson, I reside at Delive, near Bay Minette, Ala. I have known George E. Pierce, for the past 25 years, he has been a bona fide resident of Baldwin County, Ala, for more than 3 years before the filing of the bill in this cause.

I know when George Pierce and Sallie Pierce were married, they were married at Bay Minette, Baldwin County, Ala, in January over 2 years ago, they did not live together after they were married and have not lived together since.

Sallie Pierce abandoned George Pierce a short time after they were married, she abandoned his bed and board without good cause or legal excuse and has remained away every since this abandonment occurred about January 11th, 1915, and since said she has failed a and refused to resume marital relations with him and without any fault on his part.

W. H. Wilson
Minette

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

George E Pierce

vs.

Sallie Pierce

DEPOSITION TAKEN BEFORE
COMMISSIONER

DEPOSITION OF

for _____

Filed _____ 19__

Published by order of Court,

_____ 19__

_____ Register.

I, F. W. Richerson, *Register* the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by F. W. Richerson, *Register* in the words of the witness, and were read over to him, that he assented, swore to and subscribed the same in my presence, the 17th day of August 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 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 17th day of August 1917.

F. W. Richerson
Commissioner. (L. S.)

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, _____

COMMISSIONER'S FEES.

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

THE STATE OF ALABAMA,

Baldwin

County.

30

No.

CIRCUIT COURT IN EQUITY.

George E Pierce

Complainant.

vs.

Sallie Pierce.

Defendant.

DEPOSITION OF C.E.Eubanks

On oral examination before Register

before me on this 17th day of July 1917 for said Court of said County, in

the above stated cause pending in said Court of said County,

~~the witness C. E. Eubanks, who has been sworn to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:~~

~~My name is C. E. Eubanks, I have known George E. Pierce about six~~

years he resides at Bay Minette, Ala, and has been a bonafide

resident of Baldwin County, for more than 3 years, Sallie Pierce

resided Jan 1915, at or near Bay Minette, Ala, she was married to

George E Pierce at a resturant near the Depot, in Bay Minette,

Baldwin Gunty, Ala, she did not live with him after she married

him but immediately abandoned him after she married him,

it was on a sunday evening they married in Bay Minette, and went the

same evening to Summerdale, Baldwin County, Ala, and Monday Morning

following Sallie Pierce came back to Bay Minette, Alone, and on Tuesday

morning following George Pierce came back to Bay Minette, from

Summerdale, for about a week Sallie Pierce resided at a Boarding hosue in

Bay Minette, Ala, known as the Inn. and did not live with or at the place

where George Pierce lived. she remained at Bay Minette a week or two weeks

then left Baldwin County, and has not lived here since.

Mr. George E Pierce has lived here every since by himself and has

not lived with Sallie Pierce she abandoned the bed and board of

George E Pierce 2 years ago last January before the filing of this

bill and has remained away every since. and has failed and refused

to resume marital relations with him. and without any fault on his

been

the witness ~~being~~ 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:

My name is C.E.Eubanks, I have known George E Pierce about six years he resides at Bay Minette, Ala, and has been a bonafide resident of Baldwin County, for more than 3 years, Sallie Pierce resided Jan 1915, at or near Bay Minette, Ala, she was married to George E Pierce at a resturant near the Depot, in Bay Minette, Baldwin Gunty, Ala, she did not live with him after she married him but immediately abandoned him after she married him, it was on a sunday evening they married in Bay Minette, and went the same evening to Summerdale, Baldwin County, Ala, and Monday Morning following Sallie Pierce came back to Bay Minette, Alone, and on Tuesday morning following George Pierce came back to Bay Minette, from Summerdale, for about a week Sallie Pierce resided at a Boarding hosue in Bay Minette, Ala, known as the Inn. and did not live with or at the place where George Pierce lived. she remained at Bay Minette a week or two weeks then left Baldwin County, and has not lived here since.

Mr. George E Pierce has lived here every since by himself and has not lived with Sallie Pierce she abandoned the bed and board of George E Pierce 2 years ago last January before the filing of this bill and has remained away every since. and has failed and refused to resume marital relations with him. and without any fault on his

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

George E. Pierce

vs.

Sallie Pierce,

DEPOSITION TAKEN BEFORE
COMMISSIONER

DEPOSITION OF

C. E. Eubanks,

for.....

Filed..... 19.....

Published by order of Court,

..... 19.....

..... Register.

I, F. W. Richardson, Register the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by Myself F. W. Richardson, Register in the words of the witness, and were read over to him, that he assented, swore to and subscribed the same in my presence, the 17th day of August, 19 17, at

Bay Minette, Ala. 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 on oral examination before Register ~~with my personal file~~ with my personal file ~~of the said witness~~ of the said witness

Given under my hand and seal, this 17th day of August, 19 17.
F. W. Richardson (L. S.)
Commissioner.

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

COMMISSIONER'S FEES.