

ALFRED N. HAYSELDEN,
COMPLAINANT.

VS.

CATHERINE S. HAYSELDEN,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

AGREEMENT OF COUNSEL.

It is hereby agreed that respondent may withdraw her answer and cross-bill heretofore filed, and file a new answer, and that the complainant may withdraw his answer to said cross-bill.

Samuel Young Leigh & Johnston
SOLICITORS FOR COMPLAINANT.

Webb & Shepard
SOLICITORS FOR RESPONDENT.

Permission is hereby granted complainant and respondent to withdraw the papers mentioned in the above agreement of counsel, and for the respondent to file additional answer. Dated this the 16th day of

January 1924

John D. Leigh
JUDGE.

3rd

Filed Mar 25th / 24

T. W. Keenan
Register

Vertical text, possibly a date or reference number, written vertically in the center of the page.

The State of Alabama, }
Baldwin County.

No. 43 CIRCUIT COURT, IN EQUITY

Alfred N. Hayselden, Complainant.....

vs.

Katherine S. Hayselden, Defendant.....

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the 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 Complainant is forever divorced from the Defendant.

On account of voluntary abandonment of bed and board .

It is further ordered, that the said Alfred N. Hayselden,

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 Alfred N. Hayselden, 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 Katherine S. Hayselden,

It is further ordered, adjudged and decreed that said Alfred N. Hayselden shall not again marry except to said Katherine S. Hayselden,

until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Katherine S. Hayselden, during the pendency of said appeal

This 14th day of April 1924

John D. Leigh
Judge of the Circuit Court of Baldwin County.

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 1924, 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 1924

Register.

No. 43.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Alfred N. Hayselden,

vs.

Katherine S. Hayselden.

DECREE OF DIVORCE.

Filed in office this

13th day

day of

April

1924

D. W. Richardson
Register.

RECORDED

E. O. M.

RECORDED

Handwritten notes and signatures in the right margin, including a large signature that appears to be 'D. W. Richardson'.

ALFRED N. HAYSelden,)
COMPLAINANT.) IN THE CIRCUIT COURT OF
VS.) BALDWIN COUNTY, ALABAMA.
KATHERINE S. HAYSelden,)
RESPONDENT.) IN EQUITY.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

Comes Katherine S. Hayselden, and for answer to the
bill of complaint filed against her in the above entitled cause,
admits the allegations of the first and second paragraphs of
said bill. She denies the allegations of the third paragraph of
said bill.


SOLICITORS FOR RESPONDENT.

NO. 2

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

Alfred N. Hayselden, complainant.

vs.

Katherine S. Hayselden, Respondent.

ANSWER.

*Filed Mar 25/1924,
D. W. Ricciani
Register*

RECORDED

WEBB & SHEPARD,
SOLICITORS FOR RESPONDENT.

JAMES H. WEBB
TAZEWELL T. SHEPARD

LAW OFFICES OF
WEBB & SHEPARD
VAN ANTWERP BUILDING
MOBILE, ALABAMA

March 21st., 1924.

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

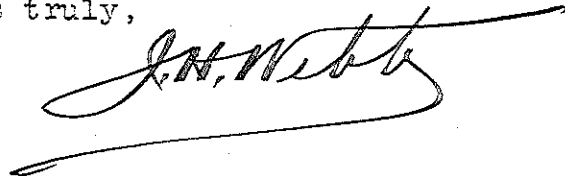
Dear Sir:-

I received cost bills you sent, and will request
Mr. Gaston to pay same.

I am enclosing herewith file of Alfred N. Hayselden vs.
Katherine S. Hayselden, having withdrawn the papers authorized
to be withdrawn by order of Hon. John D. Leigh, herewith enclosed,
leaving merely the bill of complaint and the order of Judge
Gamble as to reference to ascertain alimony and attorneys fees.
Please file the agreement as to withdrawal of such papers
sanctioned by Judge Leigh herewith enclosed, and also enclosed
formal answer.

Yours truly,

W/H.
(Encs.)



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

Non-Resident Notice #43

Baldwin County Circuit Court, In Equity.

Alfred N. Hayselden, Complainant

vs

Katherine Hayselden, Defendant

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

Date of first publication	<u>September 13th, 1917</u>	Vol. <u>28</u>	No. <u>30</u>
“ “ second “	<u>September 20th, 1917</u>	Vol. <u>28</u>	No. <u>31</u>
“ “ third “	<u>September 27th, 1917</u>	Vol. <u>28</u>	No. <u>32</u>
“ “ fourth “	<u>October 4th, 1917</u>	Vol. <u>28</u>	No. <u>33</u>

Subscribed and sworn to before the undersigned

this 16th day of October 1917.

[Signature]
Notary Public
Baldwin Co Ala

Abner J. Smith
Publisher.

Notice to Non-Resident.
 Alfred N. Hayselden, vs. Katherine Hayselden, No. 43. The State of Alabama, Baldwin County. Circuit Court, In Equity. This the 13th day of September, 1917.
 In this cause it being made to appear to the Clerk of this Court by the affidavit of Alfred N. Hayselden that the Defendant, Katherine Hayselden, is a non-resident of the State of Alabama, and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; is, therefore, ordered that publication be made in the Baldwin Times, newspaper published in the city of Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Katherine Hayselden to answer or demur to the bill of complaint in this cause by the 13th day of October, 1917, after thirty days therefrom a decree Pro Confesso may be taken against her.
 T. W. Richerson, Register.
 Restor and Young, Attys for Complainant. 30-4t

ALFRED W. HAYSELDEN
Complainant.

IN EQUITY

IN THE CIRCUIT COURT OF

-vs-

BALDWIN COUNTY, ALABAMA.

CATHERINE S. HAYSELDEN
Respondent.

It is hereby agreed between the parties to this cause that same be submitted for final decree in vacation upon the pleading and complainant's evidence and the Register of this Court is hereby requested to send all papers in the case to the Judge for final determination.

Rickaby & Becke
Solicitors for Complainant

Webb & Shepard
Solicitors for Respondent.

6th
ALFRED N. HAYSELDEN,
Complainant

-VS-

CATHERINE S. HAYSELDEN,
Respondent.

AGREEMENT AS TO SUBMISSION

*Filed Mar 28/1924,
D. W. Keenan
Register*

RECORDED

wife with him but she did not return and since 1912 he has been living separate and apart from her, for the last few years in Foley where he is vice-president of one of the banks. I see him frequently and make this statement on my personal knowledge.

Cross examination

When I say that Mrs. Hayselden was discontented in this country, I have one special occasion in mind when we discussed the matter. I am inclined to think that she spoke of it incidentally at other times but my memory is not clear about that.



Certificate.

I, the Commissioner named in the foregoing stipulation, do hereby certify that in a certain cause pending in the Circuit Court of Baldwin County, wherein Alfred N. Hayselden is Complainant and Catherine S. Hayselden is Respondent, under and by virtue of the power conferred upon me by such stipulation, I caused Alfred N. Hayselden, W. A. Stoddard and William McIntosh, witnesses in said cause, to come before me at 905 Van Antwerp Building on the Seventh day of March, the Twelfth day of March and the Twentieth day of March, 1924, respectively, where after they had been duly sworn by me, they were examined and cross-examined by counsel for Complainant and Respondent, and their testimony was by me reduced to writing as near as might be in the language of the witnesses, and after being transcribed was read over by me to them who assented to and signed the same in my presence.

I further certify that I am not of counsel or of kin to any parties of the cause or in anywise interested in the result thereof.

Witness my hand this Twenty-eighth day of March, Nineteen Hundred and Twenty-four.



Commissioner.

5/11

ALFRED N. HAYSelden
Complainant

vs

CATHERINE S. HAYSelden
Respondent.

Depositions of

Alfred N. Hayselden,
W. A. Stoddard,
and
William McIntosh.

Filed Dec 28/1924
T. W. Williams
Register

RECORDED

Commissioner for \$7.50
not paid

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2/11

ALFRED N. HAYSULDEN
Complainant

vs

CATHERINE S. HAYSULDEN
Respondent.

Depositions of

Alfred N. Hayselden,
W. A. Stoddard,
and
William McIntosh.

Filed May 28/97
T. W. Williams
Register

RECORDED

Commission for \$7.50
not paid

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W. A. STODDARD.

I am a resident of Foley, Alabama and cashier of the State Bank of Foley, prior to that time I was for a number of years cashier of the Robertsdale State Bank. I have known Mr. and Mrs. Hayselden since about January 1911 when they first came to South Baldwin. They came to Summerdales and lived there for a number of months. Mr. Hayselden located there and went into business. In the Spring of 1912 he went back to Honolulu and she went with him but when he came back in August he was alone. Mr. Hayselden has been living in Robertsdale, and later Foley, ever since. I know that he and his wife have been apart all of this time because my acquaintance with him is such that I see him almost daily. We have been associated in business deals and he is now cashier of the other Bank in Foley so I am therefore able to speak positively. He is now and has been since 1911 a bona fide resident of Baldwin County.

Cross examination.

I do not remember now whether or not I ever heard Mrs. Hayselden express dissatisfaction with living in the States. She may have done so in my presence but if so it made no impression on me and I cannot state one way or the other.



WILLIAM McINTOSH

I have known Mr. and Mrs. Hayselden since 1911 when I first came to Baldwin County. They were then living at Robertsdale. Mr. Hayselden was first president of Robertsdale State Bank and helped me organize it. I was well acquainted with them both. Mrs. Hayselden did not like living in the States and on one occasion, if not more, spoke of not liking this country and wanting to go back to Hawaii. She also expressed herself to the same effect to my wife. In 1912 Mr. Hayselden went on a business trip to Hawaii, taking his

time we reached the States my wife became discontented and though we moved from San Francisco to Chicago and later came to Baldwin County she did not like any of the locations and wanted to go back to the Islands. She became so discontented that she wanted to go back by herself and leave me there. In the Spring of 1912 I had occasion to go back to Honolulu on a business trip and took my wife with me, thinking that she might be more contented after a visit but when I started back she refused to accompany me and I came back by myself. This was in August 1912 and she has refused to come back to me since, though my home, my business and all of my interests are in Baldwin County. I have made provisions for her support, sending her money monthly but she has abandoned me entirely since 1912 and I have not seen her in all of that time. She has numerous relatives in the Islands and seemed to be happy there as she never was in the States. We have now been separated almost twelve years during which time she has lived in the Islands and I in Baldwin County, separate and apart, so that her abandonment of me has been complete in all that time.

Alfred N. Hayden

The Complainant here rested and the Solicitors for Respondent waived the right to cross examine.

NOTE OF TESTIMONY

The State of Alabama,

Alfred N. Hayselden

Complainant

vs.

Katherine S. Hayselden,

Respondent

No. 43.

In Circuit Court,

In Equity

IN THIS CAUSE comes the Complainant and Defendant on agreement,

by their solicitor^s and submits the same for Final

decree upon the Original Bill and exhibits thereto Answer of Deft,

, and upon the following testimony, to-wit:

Alfred N. Hayselden, W.A. Stoddard, and William Mc Intosh,

I hereby certify that the above note of Testimony is correct.

This 28th day of March, 19 24

T. W. Richardson
Register.

Y.M.
No. 43

The State of Alabama

Baldwin County

Circuit Court in Equity

Alfred N. Hauselden

Complainant

vs.

Katherine Hayselden.

Respondent

NOTE OF TESTIMONY

Filed 28th day of March, 19 24

J. M. Richardson Register

Record Page

RECORDED

ALFRED N. HAYSELDEN,
Complainant,

-vs-

CATHERINE S. HAYSELDEN,
Respondent.

IN EQUITY

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

It is hereby agreed between the parties to this cause that the testimony of Complainant's witnesses may be taken before Miss Lillian Toulman as Commissioner under the provisions relating to testimony on oral examination in equity cases but formal issue of commission is hereby waived.

Rickarby & Beebe
Solicitors for Complainant.

Webb & Shephard
Solicitors for Respondent.

By virtue of the foregoing agreement the undersigned acting as commissioner has caused ALFRED N. HAYSELDEN, WILLIAM McINTOSH and W. A. STODDARD, witnesses for Complainant, to come before me and they being duly sworn to tell the truth, the whole truth and nothing but the truth, upon examination by the Solicitors of the Complainant, Messrs. Rickarby & Beebe, and Solicitors for Respondent, Messrs. Webb & Shephard, testified in substance as follows:

ALFRED N. HAYSELDEN

Direct examination by Mr. Rickarby.

I am the Complainant in this cause. I am over the age of twenty-one years and was at the time this bill was filed and was also for more than three years prior to that time a bona fide resident of Baldwin County, Alabama, where I still live.

On the twenty-third day of March, 1908, I was married to Catherine S. Dickinson, the Respondent in this cause, at Lahaina T. H., and she was also at this time over the age of twenty-one years and who is now living in the Hawaiian Islands.

After we were married we lived together in the Hawaiian Islands until October, 1910 when we came to the United States and lived for a while on the Pacific coast and in Chicago and later moved to Alabama and took up our home at Robertsdale. From the

This cause coming on to
be heard upon motion of
respondent and cross-complainant
for reference to Register of this
Court to take testimony and
report as to what will be a
suitable allowance to be made
said respondent and cross-complainant
for alimony pendente lite and
for attorneys fees and taking of
testimony of her witnesses, it
is ordered, adjudged and decreed
that the matter of alimony pendente
lite, attorneys fees and cost of taking
depositions be referred to the
register of this court and that
he shall take testimony as
to such matters and return
same with his report ^{when signed} whether
in term time or vacation, at which
time such further orders and
decrees will be made as may
be proper

may 25th 1918

Attest
Judge

Palmer v. Hayelden

Circuit Court of Baldwin
County - In Equity

Bill of Complaint

Filed 8/29/17
T. W. Williams
Register

RECORDED

BESTOR & YOUNG
MOBILE, ALA.

Katherine S. Hayelden

Circuit Court of Baldwin
County - In Equity

Bill of Complaint

Filed 8/29/17
T. W. Hildreth
Register

RECORDED

BESTOR & YOUNG
MOBILE, ALA.

State of Alabama
County of Baldwin

Personally appeared before me, L. Glendinning
a Notary Public in and for the above State and County, Alfred N.
Hayselden, who being by me first duly sworn, on oath says: that
Katherine S. Hayselden is over the age of twenty-one years and
is a non-resident of the State of Alabama. Affiant further
says that the said Katherine S. Hayselden is either a resident
of the State of California, her address being 323 North Broadway,
Los Angeles, or is a resident of Hawaii, her address being 790
Beretania Street, Honolulu.

Alfred N. Hayselden

Subscribed and sworn to before me
on this 25 day of August, A.D., 1917.

Notary Public, Baldwin County, Ala.

L. Glendinning

Notary Public in and for said County and State

My Commission Expires February 18, 1919



law, and that she be required to plead, answer, or demur to the allegations of this Bill of Complaint, according to the rules of this Honorable Court.

Prayer for Relief.

Wherefore, complainant further prays that upon the final hearing of this cause a decree of divorce may be rendered, forever dissolving the bonds of matrimony between him and the said respondent, Katherine S. Hayseiden.

Complainant further prays for such further, additional, and other relief as to your Honor may seem meet and proper.

Besta Young
Solicitors for Complainant

Foot Note

The respondent is required to answer, but not under oath, all the allegations contained in the foregoing bill of complaint, from paragraph one to paragraph three, both inclusive, oath as such answers being hereby expressly waived.

Besta Young
Solicitors for Complainant

(43)

To The Honorable A. E. Gamble, Judge of the Circuit Court
of Baldwin County, Alabama.

In Equity.

Your complainant, Alfred N. Hayselden, brings this his Bill of Complaint against Katherine S. Hayselden, and respectfully shows,

First

That he is over the age of twenty-one years and is a resident of Summerdale, in Baldwin County, State of Alabama, and has been such for more than three years next before filing of this bill of complaint. That Katherine S. Hayselden, respondent in this cause, is over the age of twenty-one years and is a non-resident of the State of Alabama, that is to say, she resides either in the City of Los Angeles, California, or in Honolulu, Hawaii.

Second.

That on the 23rd day of March, 1908, they were legally married in Sahama, Hawaii, and from that time until August, 1912, they lived together as man and wife. That in January, 1911, they moved to Summerdale, Baldwin County, Alabama, and made their home there, where they lived together until August, 1912, as aforesaid and where complainant has since that time maintained his home.

Third.

Your complainant shows that in August, 1912, said respondent voluntarily abandoned his bed and board and such abandonment has continued continuously from that time down to the time of the filing of this Bill of Complaint, although respondent has been requested by complainant to return to him.

Prayer for Process.

The premises considered, complainant prays that the said Katherine S. Hayselden may be made a party respondent to this Bill of Complaint; that service may be had upon her as required by

X

Alfred N. Hayselden
Complainant,

vs

Catherine S. Hayselden,
Respondent

Depositions of

Alfred N. Hayselden,

W. A. Stoddard,

and

William McIntosh.

Witnesses for complainant.

Mr. Thomas W. Richerson,

Register Circuit Court,

Bay Minette, Ala.

*Filed
Nov 28/1924
T. W. Richerson
Register*

Bay Minette, Ala.,

October 5th, 1917

M Alfred N. Hayselden
vs
Katherine Hayselden

NOTICE TO NON-RESIDENT
Bestor & Young,
Attorneys for Plaintiff.

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 Non-Resident Notice in The Baldwin Times
in issues of September 13th, 20th, 27th and October 4th, 1917: \$3.00

Above is a special price, if paid within ten days of date of bill, if not paid
then, charge to be made at legal rates.