

56

-Bill of complaint for Divorce-

STATE OF ALABAMA.) IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.
BALDWIN COUNTY.) --IN EQUITY--

TO THE HONORABLE A. E. GAMBLE, JUDGE OF THE CIRCUIT COURT,
SECOND JUDICIAL CIRCUIT, BALDWIN COUNTY, ALABAMA, AT BAY MINETTE, ---
-----SITTING IN EQUITY-----.

Your Orator, Salen Kahalley, exhibits this, his bill of complaint for Divorce for Adultery from Sadie Kahalley;

Humbly complaining, Orator shows unto Your Honor that he is a "bona fide" resident of the State of Alabama, residing at Bay Minette and that he is over the age of twenty-one years; that Defendant, Sadie Kahalley is over the age of twenty-one (21) years, is a non-resident of the State of Alabama and when last heard from resided in New York State of State of New York, whose more particular address is unknown to Orator and cannot be ascertained after diligent inquiry.

Orator Charges;

First-----That he and the defendant Sadie Kahalley were married in Syria, in Turkey, on to-wit October 15th, 1906, and that two children were born of such marriage to-wit; Fred, a boy now nine (9) years old and George, a boy now 11 years of age. That both children are now in Birmingham, State of Alabama, in school and under the control of Orator.

Second----That said Sadie Kahalley is a lewd woman, having committed acts of adultery with various and sundry persons, whose names and the particular places of these places are unknown to complainant. That on to-wit, the Summer of 1916, at the Town of Atmore, the said Sadie Kahalley did commit adultery and continue in adulterous association with one Joe Abogdela, a Syrian of her own nationality.

That on to-wit, September 8th, the Said Sadie Kahalley did leave the Orator to go with another man, nameley, Sam Zaroor, a Syrian of her own nationality, first going to Birmingham under pretense of seeing the Children who were inschool there, but receiving a ticket from the Said Sam Zaroor to go to New York, she left Birmingham and went to New York where she is at the present time with the said Sam Zaroor. That she is a woman of lewd and bad character, violating the rules of marital chastity and violationg her obligations as a wife,

STATE OF ALABAMA.)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

-IN EQUITY-

"SALEN KAHALLEY, Complainant-vs-SADIE KAHALLEY, Defendant."

Before me, T. W. Richerson, Clerk of Circuit Court and Register in Chancery, in and for said County and State, personally appeared Salen Kahalley, who is known to me, and who, being by me first duly sworn, doth depose and say under oath; That he is the Complainant in a Chancery Suit this day filed against Sadie Kahalley, who is his wife and the Defendant in said suit, now pending in the Chancery Side of the Circuit Court of Baldwin County, Alabama; that he and the said Sadie Kahalley are both over the age of twenty-one (21) years and both are of sound mind; that he is a "bona fide" resident of the State of Alabama and now resides at Bay Minette, Alabama. That his wife Sadie Kahalley is a non-resident of the State of Alabama and resided, when last heard from resided in the City of New York, State of New York, and that he believes that Service by Publication is necessary to make the said Sadie Kahalley party respondent to his bill of Complaint for Divorce.

Sworn to and subscribed before me this the 8th day of Nov., 1917.

Salen Kahalley

T. W. Richerson
Clerk of Circuit Court and
Register in Chancery.
Baldwin County, Alabama.

No. _____

AFFIDAVIT FOR PUBLICATION.
By Complainant.

CIRCUIT COURT,
BALDWIN COUNTY,
STATE OF ALABAMA.

-----IN EQUITY-----

SALLEN KAHALLEY,
Complainant.

--vs--

SADIE KAHALLEY,
Defendant.

SUITE FOR DIVORCE.

Filed in this office this

Nov 8, 1917.

McMecham
CLERK.

Bay Minette, Ala.,

November 30th, 1917

M

Salen Kahalley, Complainant
vs
Sadie Kahalley, Defendant

NOTICE TO NON-RESIDENT
Stone & Stone,
Solicitors for Complainant.

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 November 8, 15, 22, and 29th, 1917:
Four consecutive issues..... \$3.50

2nd publication

JR/Boyle

~~V. O. ROBERT~~
ATTORNEY AT LAW
AMERICAN TRUST BUILDING
BIRMINGHAM, ALABAMA

*Salon Kahalley
vs
Sadie Kahalley
Deposition of First Kahalley
Mailed this 5th day of
February 1918
John R. Boyle*

RETURN RECEIPT REQUESTED.



To the Clerk of Circuit Court
Bay Minette
Baldwin County
Ala.

REGISTERED

25748

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

To John R. Boyle

KNOW YE, That we, having full faith in your prudence and competency, have appointed you Commissioners, and by these presents do authorize you, or any one or more of you, at such time and place as you may appoint, to call before you and examine Fred Kahalley

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

Salen Kahalley, is Complainant

and Sadie Kahalley is Respondent.

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

Witness second day of February 1918

J. W. Richardson

Register.

DIRECTIONS FOR EXAMINATION OF WITNESSES UPON INTERROGATORIES.

1. If the time and place of executing the Commission are named therein, or in a notice appended thereto, the testimony must be taken at the time and place designated; if no time and place are designated, the Commissioners will call the witness before them at such time and place as they may appoint, and administer to him an oath to speak the truth, the whole truth, and nothing but the truth, in answer to the interrogatories to be propounded to him. The time and place of examining witnesses should be stated in the caption of the deposition.

2. The caption and deposition should be as follows:

THE STATE OF ALABAMA,

.....County. }

Deposition of Richard Howe, a witness sworn (or affirmed, as the case may be) on the.....day of.....19....., at.....in said State and County, under and by virtue of a commission issued out of the.....

Court of.....in a certain cause therein pending between James Jones, the plaintiff (or complainant), and Samuel Young, defendant (or respondent). The said Richard Howe, being first duly sworn to speak the truth, the whole truth, and nothing but the truth, doth depose and say as follows:

To the first interrogatory he saith: (Here write the answer of the witness as nearly as may be in the language of the witness, using the first person where he uses it).

To the second direct interrogatory he saith: (Write the answer to this interrogatory, and all others, as directed above).

If there are cross or rebutting interrogatories, go through with them in the same manner, thus:

To the first cross interrogatory he saith, etc.

To the second cross interrogatory he saith, etc.

To the first rebutting interrogatory he saith, etc.

Neither party should be permitted to put to the witness, during his examination, any verbal question or suggestion; and if anything of the kind is done by either party, the Commissioner should write it down in the deposition just as it occurred.

The testimony may be written down by any one or more of the Commissioners, by the witness himself, or by any disinterested third party in the presence of the Commissioners, and be read over to the witness if he desire it, and must be subscribed by him.

3. The Commissioners must then add their certificate, as follows:

We, (or I, if only one acts), the undersigned, Commissioners in said commission named, hereby certify that we are not of counsel or of kin to any of the parties to this cause, nor in any manner interested in the result thereof; that we are personally acquainted with said witness, J——K——, and know him to be the identical person named in said commission (or have had proof made before us of the personal identity of the witness, and that he is the identical person named in said commission); that he was sworn and examined as above stated; and that his evidence was taken down, as near as might be, in his own language, and was subscribed by him in our presence on the.....day of.....19....., at the place above stated.

[L. S.]

[L. S.]

E. F.

G. H.

Commissioners.

If the Commissioners are not personally acquainted with the witness, they must have proof made before them that he is the identical person named in the commission, and so certify.

If the witness claims for his attendance, the Commissioners should state in their certificate the number of miles traveled, the number of days the witness attended, ferriage paid, if any, etc.

4. If any exhibits, writings, or papers are produced and used as evidence by the witness, they shall be annexed to the deposition to which they relate, and shall be identified by suitable letters or marks.

If the testimony cannot be taken in one day, the Commissioners, noting the same, may continue from day to day until completed.

5. The Commissioners will fold the depositions, commission, interrogatories, and exhibits, in a packet sealed with three seals. They will write their name or names across each seal, and direct thus:

A B

vs.

C D

Depositions of J K and L M

Mailed the.....day of.....19.....

E. F.

G. H.

To (give name and style of Clerk, Register, or Judge of Probate, as the case may be),

.....County, Alabama.

If sent by private conveyance, should be endorsed: "Forwarded by R A, the.....day of.....19..... The package must be delivered to the officer to whom it is directed. The person bringing the deposition will be required to take an oath that it has not been opened or altered since he received it.

The Commissioner must return the commission.

No. 56

THE STATE OF ALABAMA,

Baldwin County,

CIRCUIT COURT, IN EQUITY.

Baldwin County.

Salen Kahalley

Complainant

vs.

Sadie Kahalley

Defendant

COMMISSION TO TAKE DEPOSITION ON INTERROGATORIES.

COMMISSIONERS:

John R. Boyle

WITNESSES:

Fred Kahalley

SALEN KAHALLEY,
Complainant.

-vs-

SADIE KAHALLEY,
Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA.

BALDWIN COUNTY.

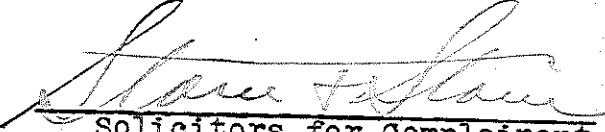
Interrogatories to be propounded to Fred Kahalley, a material witness for the complainant in the above entitled cause, said Fred Kahalley residing at Birmingham, Alabama.

FIRST;- What is your name and age? What relation to you to Sadie Kahalley? What relation are you to Salen Kahalley?

SECOND- Ware you ever in Cincinnati, Ohio, with your mother, Sadie Kahalley? When was that? Did you see Sam Zaroor while you were there with your mother? Was your father then in Cincinnati? Where was he at that time?

THIRD:- Please tell what happened between your mother and Sam Zaroor. Did you see them in the same bed together? Did you see them sleep together? Did you ever tell your father about this? Tell all your remember of what happened between your mother and Sam Zaroor.

John R. Boyle, of Birmingham, Alabama, is suggested as a suitable person to propound the above interrogatories.


Solicitors for Complainant.

THE STATE OF ALABAMA,

No.

Baldwin County. }

CIRCUIT COURT IN EQUITY.

Salen Kahalley Complainant

vs.

Sadie Kahalley Defendant

DEPOSITION OF *Fred Kahalley*

By virtue of the Commission hereto annexed, issued by the Register for said Court of said County, in the above stated cause pending in said Court of said County,

I, *John R. Boyle* the Commissioner named in said Commission, have called and caused to come before me *Fred Kahalley*

the witness named in the Commission, 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 the first interrogatory he saith, My name is Fred Kahalley. I am ten years old. Sadie Kahalley is my mother. Salen Kahalley is my father.

To the second interrogatory he saith, Yes, I was in Cincinnati with my mother Sadie Kahalley. I was with my mother in Cincinnati during the winter of ~~1916~~¹⁹¹⁶⁻¹⁷, that is last winter. I saw Sam Garoor while I was in Cincinnati with my mother. No, my father was not in Cincinnati at that time. My father was in Bay Minette Ala at that time.

To the third interrogatory he saith, My mother and I lived in a furnished room in Cincinnati on Broadway. We had just one room. Sam Garoor came to the room to see my mother every night. He would give me some money and tell me to go to the morning picture show.

Sometimes when I went to the picture show I would be lost and not get home before twelve o'clock at night. Often when I came home at night the door of my mother's room was locked and she and Sam Jaroo were inside. They would pretend to have been asleep. When I went to bed Sam would give me some money and tell me to go to sleep and my mother and Sam Jaroo would sit in chairs till I went to sleep. When I woke up in the morning, Sam Jaroo would still be in the room. Sometimes during the day my mother and Sam Jaroo would be gone all day. On one occasion I saw Sam Jaroo kiss my mother. While we were in ^{Detroit Mich.} ~~Cincinnati~~ Jaroo, my mother, and I went out in the country in an automobile. We went out in the afternoon and stopped all night at a house. I slept in a room by myself. When I went to bed I left Jaroo and my mother down stairs together. Jaroo was drunk at the time. My mother always told me not to say anything about Jaroo being in the room with her. On one occasion I saw Jaroo give my mother forty dollars. He gave her money on other occasions.

I never saw Jaroo and my mother in bed together.

I never saw Jaroo ^{and my mother} sleep together in a bed, but I have ^(seen them sleep in a chair)

I told my father about this when I went back to Bay Minette.

My mother and I went to Washington Court House Ohio and stayed with my aunt for a while. Sam Jaroo came to see her and would go to my mother's room. My uncle finally told her to leave the house because Jaroo came to see her. My mother would never let my ^{little} cousins into the room while Sam ^{Jaroo} was there. While I was in Washington Court house, my mother went to Cincinnati

and stayed for a while by herself.

When my mother and I went to Detroit Garoor came with us and took us to a hotel where we stayed a few days. We then went into the country as testified above, on which occasion we stopped at a house in the country. Garoor went on the train to Detroit with my mother and me. Garoor would give my mother money whenever she asked for it. Sometimes when Garoor would give me money to ~~the~~ go to the picture shows I would get lost and be away for some time. This happened in Cincinnati and Detroit. Garoor and my mother used to write to each other very often.

On one occasion in Cincinnati after I had gone to bed, my mother undressed and sat on the bed while Sam Garoor was in the room. Sam Garoor stayed all night on that occasion. He was there when I woke up in the morning.

Fred Kahalley.

(In examining the witness Fred Kahalley, I found, that, though a young boy, he has a good memory and was sure of everything that he said. He seemed to understand perfectly the nature of an oath.)

John R. Boyle

I, John R Boyle the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by John R Boyle 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 fourth day of February 19 18, at Birmingham 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, 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 fourth day of February 19 18

John R Boyle (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..... Page.....

THE STATE OF ALABAMA,

County.....

CIRCUIT COURT, IN EQUITY.

John Kahalley Pl.

vs.

Ernie Kahalley Sept

DEPOSITION TAKEN BEFORE
COMMISSIONER

DEPOSITION OF

Ernie Kahalley

for.....

Filed.....

19.....

Published by order of Court,

19.....

Register.....

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 56 CIRCUIT COURT, IN EQUITY.

SALEN KAHALLY Complainant

vs. SADIE KAHALLY Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso

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

his 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

SALEN KAHALLY is forever divorced from the said
SADIE KAHALLY for and on account of

ADULTERY

as alleged in said Bill of Complaint;

It is further ordered, that the said SALEN KAHALLY

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 SALEN KAHALLY

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 SALEN KAHALLY

It is further ordered, adjudged and decreed that said SALEN KAHALLY

shall not again marry except to said SADIE KAHALLY

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except

to said SADIE KAHALLY during the pendency of said appeal.

and that the custody of said minor children Fred Kahally and George

Kahally is awarded to Complainant Salen Kahally.

This 9th day of July 1918

W. G. Gandy
Judge of the Circuit Court of Baldwin County.

No. *516*

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

SALLEN KAHALLY

vs.

SADIE KAHALLY

DECREE OF DIVORCE.

Filed in office this *11th*

day of *February* 191*8*

W. H. Freeman
Register.

E. O. M.

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

NOTICE TO NON-RESIDENT

Salen Kahalley, Complainant

vs

Sadie Kahalley, Defendant,

Baldwin County Circuit Court;

In Equity.

Was published in said Newspaper for 4 consecutive weeks

in the following issues:

Date of first publication	November 8th, 1917	Vol. 28	No. 38
“ “ second “	November 15th, 1917	Vol. 28	No. 39
“ “ third “	November 22nd, 1917	Vol. 28	No. 40
“ “ fourth “	November 29th, 1917	Vol. 28	No. 41

Subscribed and sworn to before the undersigned

this 30th day of Nov 1917.

T. W. Richerson
Clerk Circuit Court

Abner J. Smith
Publisher.

Notice to Non-Resident:
Salen Kahalley, Complainant, vs. Sadie Kahalley, Defendant. The State of Alabama, Baldwin County. Circuit Court, in Equity. This the 8th day of November, 1917.

It this cause it being made to appear to the Clerk of this Court by the affidavit of Salen Kahalley, the complainant, that the Defendant Sadie Kahalley, Defendant, is a non-resident of the State of Alabama, residing in New York, State of New York, and whose more particular address is unknown and cannot be ascertained after diligent inquiry and search, that, in the belief of said Plaintiff the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Baldwin County of Baldwin, Alabama, one week for four consecutive weeks, requiring that the said Sadie Kahalley, Defendant, to answer or return to the Bill of Complaint in this cause by the 8th day of December, 1917, or after thirty days therefrom a decree Pro Confesso may be entered against her.

T. W. Richerson, Register.
He and Stone,
Solicitors for Complainant.

THE STATE OF ALABAMA,

No. 56

Baldwin County.

CIRCUIT COURT IN EQUITY.

Salen Kahalley

Complainant

vs.

Sadie Kahalley

Defendant

DEPOSITION OF J. P. Kennedy.

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,

T. W. Richerson

Register of said Court of said County,

have called and caused to come before me

J. P. Kennedy,

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:

My name is J. P. Kennedy and I now reside at Mobile where I have lived for the past sixteen years. I know Both Salen Kahalley and his wife, Sadie Kahalley. I have known both of them for the past five years. They have two sons, Fred and George. The last time I saw Sadie Kahalley was in May, 1917. She was then in Mobile. At that time she told me she wanted to get a divorce from Salen Kahalley. I know Joe Abogdela and have known him for the past three or four years. During the year 1916 he was very intimate with Sadie Kahalley. She going to Atmore and staying for two weeks at a time. He was living in Atmore at that time also. Also, every time Salen Kahalley would leave Mobile to go to Atmore to his store Joe Abogdela would come to Mobile. I was working in the store of Salen Kahalley at the time. At one time I saw the said Joe Abogdela, while Salen Kahalley was in Atmore, enter the room of Sadie Kahalley. I never saw him when he came out nor did I hear him but Sadie Kahalley did not come downstairs to the store until about twelve o'clock while it was customary for her to come down about eight o'clock while Mr. Kahalley was there. Salen Kahalley would go to Atmore about every week. Each time Salen Kahalley would go to Atmore Joe Abogdela would come to Mobile to see Sadie Kahalley, spending nearly all of each day there with Sadie Kahalley.

At one time, while I was working in the store of Salen Kahalley one Napan from New Orleans came into the store where Sadie Kahalley and I were closing up about eight o'clock P. M. Instead of counting the cash as usual and winding up the days business Sadie Kahalley told me to go on home. Just as I left she locked up the store with she and Napan the only ones in there. The next morning she told me to say nothing about Napan being there at all.

My age is fifty years.

J. P. Kennedy

T. W. Richerson

I, T. W. Richerson, 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 him, that he assented, swore to and subscribed the same in my presence, the 28th day of January 1918, at Bay Minette, Alabama.

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 28th day of January 1918.

T. W. Richerson (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, ...

Form with fields for No. (56), Page, THE STATE OF ALABAMA, Baldwin County, Circuit Court in Equity, vs. Sadie Kahaley, DEPOSITION TAKEN BEFORE REGISTER, DEPOSITION OF John P. Waddy, Filed 1/28 1918, Published by order of Court, 19, Register.

My name is Salan Kahally, I am the complainant in the divorce case against Sadie Kahally my wife in this court, I am over 21 years old and so is she, I have been a resident citizen of Alabama, for 10 years and have been a naturalized citizen of the United States for 10 years, I am a merchant owning store and stock of merchandise in Bay Minette Alabama, where I have lived for the past 2 years.

Sadie Kahally and myself were married in Syria Oct. 15th. 1906 and brought her to this country to Mobile Ala first, she was for a time a good woman and good wife until she met one George Corwy, a Syrian, I caught both of them in my own bedroom together, both undressed, I called a policeman in and George Corwy fled, she admitted to me that she had sexual intercourse with George Corwy, after a time she begged me to try her again and that she would be true to me and I forgave her and took her back as my wife.

I had a branch store at Atmore at that time and she went up to Atmore to attend to sales when she met Joe Aboudala, another Syrian, they were caught together in sexual intercourse by the Town Marshall and both run out of town and caused me to sell out my business, I loved this woman so much that I again took her back and tried to make a good woman out of her on account of our two boys, and then moved to Bay Minette, she then visited Cincinnati Ohio to see her sister, and there met Sam Zarou, a Syrian, with whom she became intimate, she came back to Bay Minette and then left again telling me that she was never coming back and that she loved Sam Zarou, she followed him to Cincinnati, Dayton, Columbus, Cleveland and Detroit Mich. and then to New York.

I hereto attach a copy in Syrian and also into English of a letter which came into possession of My Brother in law Aleas Therbit in New York of a letter which Sadie Kahally wrote to Sam Zarou. This copy was sent to me by my brother in Law Aleas Therbit with whom my wife stopped for a while in New York.

She is a woman of lewd character and I have never forgiven for this last offence.

I want the custody of my Children as she is not the proper person to take care of them.

Salan Kahally

THE STATE OF ALABAMA,
Baldwin County.

No. *36*

CIRCUIT COURT IN EQUITY.

Sam Kelsey Complainant.

vs.

Sadie Kelsey Defendant.

DEPOSITION OF *Sam Kelsey*

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. Kelsey* Register of said Court of said County,

have called and caused to come before me

Sam Kelsey

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:

I, T. V. Ricerson the said Register, hereby certify that the foregoing testimony was taken down in writing by Mary 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 13th day of Jan 1918, at Wagon Wheel 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 13th day of Jan 1918
T. V. Ricerson (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. 56 Page

THE STATE OF ALABAMA,
 County.

CIRCUIT COURT, IN EQUITY.

Allen Kelsey
 vs.
Charlie Kelsey

DEPOSITION TAKEN BEFORE
 REGISTER

DEPOSITION OF
Allen Kelsey

for

Filed 19

Published by order of Court,
19

Register.

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

Baldwin County.

No. 56 Fall Term, 19.....

Salen Kahalley Complainants

vs.

Sadie Kahalley Defendants

Motion is hereby made for a Decree Pro Confesso against Sadie Kahalley

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 7th day of January 1918.

Stouel & Stouel

Solicitor.

No. 56 Page.....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Salen Kahalley

Complainants.

vs.

Sadie Kahalley

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed January 7th 19 18

Register.

Recorded in..... Record,

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

J. W. Reeves
Register.

Granted J. W. Reeves
Register.

THE STATE OF ALABAMA,

Baldwin

County.

CIRCUIT COURT, IN EQUITY.

No. 56

Fall

Term, 1918

Selen Kahalley

Complainant

vs. Sadie Kahalley

Defendant

In this cause it appears to the Register T. W. Richerson that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 8th of November day of 1917, in the Baldwin Times a newspaper published in Baldwin County, Alabama, that a copy of said order was posted at the Court House door in County on the day of 19, and that another copy was sent by mail on the day of 19, to

And it now further appearing to the Register T. W. Richerson that the said

Sadie Kahalley

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register T. W. Richerson that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said

Sadie Kahalley

This 7th day of January 1918

T. W. Richerson

Register.

No. 56 Page

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Selen Kahalley

vs.
Sadie Kahalley

DECREE PRO CONFESSO ON
PUBLICATION.

Issued January 7th 1918

Per Bicmore
Register.

Recorded in Record

Vol. Page

Register.

THE STATE OF ALABAMA,

Baldwin County.

No. *66*

CIRCUIT COURT IN EQUITY.

Walter Kelsey Complainant

vs.

Sadie Kelsey Defendant

DEPOSITION OF *Acree Burns*

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, *D. Messer* Register of said Court of said County,

have called and caused to come before me

Acree Burns

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:

I, J. W. Picum 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 him, that he assented, swore to and subscribed the same in my presence, the 13th day of Jan 1918, at Bayou La Pate 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 13th day of Jan 1918
J. W. Picum (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. 56 Page.....

THE STATE OF ALABAMA,
Barlow County.

CIRCUIT COURT, IN EQUITY.
John Barlow

vs.
Marie Barlow

DEPOSITION TAKEN BEFORE
 REGISTER

DEPOSITION OF
John Barlow

for.....

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

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

Register.

I know both Salan Kahally and Sadie Thabit Kahally his wife, I did not see them married, but am informed that they married in Syria, Salan came back from Syria first and then she came, this was about 10 years ago, they lived together as man and wife in Mobile Alabama and also in Bay Minette, Ala.

Both are over 21 years old, she came to my store and residence often when she lived in Bay Minette, about 4 months ago in September 1917 she left Bay Minette, before leaving she told me that she was going to see her children in Birmingham but that she was never coming back, I dont know who she went off with. she only told me that she said that she was never coming back. During the time she was in Bay Minette she showed me a letter which she told me was from Sam Zarou, I dont know what was in the letter.

Salan Kahally has been a citizen of Alabama for more than three years.

O. H. W. S. S. O. R.

NOTE OF TESTIMONY AND REQUEST FOR SUBMISSION.

~~Salan~~^{Salan} Kahally

Circuit Court Baldwin County. Ala.

vs

Equity Side.

Sadie Kahally

This cause is submitted in behalf of complainant upon the original bill of complaint, decree pro confesso, and depositions of

~~Salan~~^{Salan} Kahally. ---Oscar Nassar.--- John P Kennedy.--- Fred Kahally.

This Feby. 8th. 1918.

Stoue & Stoue
Solicitors for complainant.

To the Register

Application is hereby made that you deliver to Hon A E Gamble, Judge of the Circuit Court the foregoing note of testimony, together with all papers and depositions in said cuase, and request a submission of said cause upon the pleadings and proof mentioned in said note of testimony

This Feby. 8th. 1918.

Stoue & Stoue
Solicitors for complainant.

SALAN KAHALILY

VS

SADIE KAHALILY

NOTE OF TESTIMONY AND

REQUEST FOR SUBMISSION

Filed Feb'y. 28th. 1918.

Register

page #2.

so that she is unfit to have the charge and control of the said children.

Third-----The Orator has never condoned or forgiven the act of adultery with the said Sam Zaroor.

PRAYER FOR PROCESS.

The Premises Considered, Orator prays that Your Honor will make and cause to be issued such orders and decrees and subpoenas as will be necessary to make the said Sadie Kahalley party respondent to this, his bill of complaint for divorce for adultery.

PRAYER FOR RELIEF.

The Premises Considered, May it please your Honor wupon a final hearing of this cause to Decree to Orator an absolute decree of Divorce for Adultery from the said Sadie Kahalley and such other and further orders and relief as he may in equity and justice be entitled to.,

And as in duty bound he will ever pray, etc., etc.,

Salew Kahalley
By Stone & Stone
His Solicitors.

FOOT NOTE--The Respondent is required to answer each and every paragraph of the above Bill of Complaint from First to Third, both inclusive, but not under oath, as oath is hereby expressly waived.

Salew Kahalley
By Stone & Stone
His Solicitors.

Original

Salm Kohachy

Sadie Kohachy

Suit for divorce

Hone & Stone
Laborers' Fund

Filed in this
office November
Eighth - 1917

J. W. Recumman
Clerk