

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

Before Me T. W. Richerson, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared Eddie L. Watkins, who after being by me first duly sworn deposes and says, that he is the Complainant in the case of Eddie L. Watkins against Ada Watkins, that he is informed and believes that said Ada Watkins is a non-resident of the State of Alabama, that he has made diligent inquiry as to her place of residence and after such diligent inquiry he is unable to ascertain her place of residence or her post office address, he further states that to the best of his knowledge and belief she is over eighteen years of age.

Subscribed and sworn to before me )  
this December 1st 1917. )

T. W. Richerson  
Clerk Circuit Court. )

Eddie L. Watkins

No 59.

THE STATE OF ALABAMA

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Eddie L. Watkins  
Complainant  
vs.  
Ada Watkins,  
Defendant

AFFIDAVIT OF NONRESIDENCE.

Filed in Office this 1st day of  
December 1917.

*W. R. Reel*

Register.

THE STATE OF ALABAMA,

Baldwin County.

Eddie L. Watkins

vs.

12059

No.

Ada Watkins

CIRCUIT COURT, IN EQUITY.

To the Hon. A. E. Gamble, Judge of the Circuit Court of Baldwin County, State of Alabama:

THE BILL OF COMPLAINT of Eddie L. Watkins

exhibited in the Circuit Court against Ada Watkins

humbly complaining, your orator shows your Honor as follows: that he is a bona fide resident of the State of Alabama, and has been such resident for more than three years next before the filing of this bill; that he is over twenty-one years of age; that he and the said Ada Watkins were married on or about the 4th. day of April 1915, in the town of Hennegar, in De Kalb County, Alabama, that they moved to Baldwin County, Alabama, near Perdido in March 1916, where they lived until she left him some time in the month of July 1916, and he has not seen her since, nor heard directly from her; he is informed that she has left the State of Alabama, but he has been unable to ascertain her present residence or post office address; that he does not know her exact age but she is over eighteen years of age.

Orator further shows unto your Honor, that his said wife has committed acts of adultery at various and sundry times in the month of July 1916 with one Carl Henderson; that said acts of adultery were without his knowledge or consent and that he has never in any way condoned said acts; that he always treated his said wife with kindness and affection and provided suitably for her comfort and maintenance

WHEREFORE, Your said orator prays that a Writ of Subpoena may issue to said

Ada Watkins commanding her to appear and

or

answer this Bill of Complaint; that said Ada Watkins be made a party

by publication against her as a non-resident

Defendant heretofore and that your Honor will make a decree annulling said marriage, granting your orator a

divorce, and permitting him to again marry, and as in duty bound, he will ever pray.

Wm S. Anderson

Solicitors for Complainant.

NOTE.—The Defendant is required, but not under oath, to answer the above Bill.

Wm S. Anderson

Solicitors for Complainant.

No. 59 Page.....

*215*

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Eddie L. Watkins

Complainant

~~Plaintiff~~

vs.

Ada Watkins

Defendant.....

BILL OF COMPLAINT.

Filed December 1st 1917.

*J. W. Williams*

Register.

Wm. S. Anderson

Plaintiff's Attorney.

Defendant's Attorney.

After five days return to  
W. H. HAWKINS  
Attorney-at-Law  
Bay Minette, Alabama

Depositions of

Eddie J. Watkins  
Wamon Blackman  
Witnesses for Complainant.

*Subscribed by  
Director of Register  
their 12 a day of  
H. S. January 1918  
J. W. Richardson  
Register*

Hon. F. W. Richerson,

Register,

Bay Minette,

Alabama.

W. H. Haukris  
Commissioner

W. H. Haukris  
Commissioner

W. H. Haukris  
Commissioner

# 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 No. 59

Baldwin County Circuit Court, In Equity.

Eddie L. Watkins,

vs

Ada Watkins

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

Date of first publication	December 6th, 1917	Vol. 28	No. 42
“ “ second “	December 13th, 1917	Vol. 28	No. 43
“ “ third “	December 20th, 1917	Vol. 28	No. 44
“ “ fourth “	December 27th, 1917	Vol. 28	No. 45

Subscribed and sworn to before the undersigned

this 31st day of Dec, 1917.

T. W. Richerson  
Clerk Circuit Court

Abner J. Smith  
Publisher.

*Bill paid by W. S. Anderson*

**Notice to Non-Resident.**

Eddie L. Watkins vs. Ada Watkins. No. 59. The State of Alabama, Baldwin County. Circuit Court, in Equity. This the 1st day of December, 1917.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Eddie L. Watkins, Complainant, that the Defendant Ada Watkins, is a non-resident of the State of Alabama and her place of residence is unknown, and that he has made diligent inquiry to ascertain her place of residence and is unable to ascertain her place of residence or her post office address, and further, that, in the belief of said Affiant the Defendant is over the age of 18 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in the County of Baldwin, State of Alabama, once a week for four consecutive weeks, requiring the said Defendant, Ada Watkins, to answer or demur to the Bill of Complaint in this cause by the 10th day of January, 1918, or after thirty days therefrom a decree Pro Confesso may be taken against her.

T. W. Richerson, Register.  
Wm. S. Anderson,  
Solicitor for Complainant.

42-4t

*Proof of Publication*



THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

County. } No. 59

Term, 1918

Eddie L. Watkins

Complainant

vs

Ada Watkins

Defendant

In this cause it appears to the Register..... that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 6<sup>th</sup> day of December 1917, in the Baldwin Times a newspaper published in Bay Minette, Baldwin County, Alabama, that a copy of said order was posted at the Court House door in Insulin County on the 7<sup>th</sup> day of December 1917, and that another copy was sent by mail on the 7<sup>th</sup> day of 19....., to.....

And it now further appearing to the Register..... that the said

Ada Watkins

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..... that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said

Ada Watkins

This 11<sup>th</sup> day of February 1918

D. W. Richardson

Register.

No. 59 Page.....

THE STATE OF ALABAMA,  
Madison County.

CIRCUIT COURT, IN EQUITY.

Eddie L. Watkins

vs.

Ada Watkins

DECREE PRO CONFESSO ON  
PUBLICATION.

Issued 2/11 1918

J. D. McCreary  
Register.

Recorded in.....Record

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

Register.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 59 Term, 1918

Eddie L Watkins

Complainants

vs.

Ada Watkins

Defendants

Motion is hereby made for a Decree Pro Confesso against Ada Watkins

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 10th day of February 1918

W. S. Anderson

Solicitor.

No. 59 Page.....

THE STATE OF ALABAMA,  
Madison County.

CIRCUIT COURT, IN EQUITY.

Eddie L Watkins

Complainants.

vs.

Ada Watkins

Defendants.

MOTION FOR DECREE PRO  
CONFESSO ON PUBLICATION.

Filed Feb. 11<sup>th</sup> 1918

J. W. McCallum  
Register.

Recorded in..... Record,

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

Register.

*[Handwritten scribbles and marks on the right side of the page]*

Eddie L. Watkins

vs. # 39

Ada Watkins

THE STATE OF ALABAMA,  
Baldwin COUNTY.

CIRCUIT COURT, IN EQUITY.

This the 1st day of  
December 1917

In this cause it being made to appear to the Clerk of this Court by the affidavit of

Eddie L. Watkins, Complainant

that the Defendant Ada Watkins

is a non-resident of the State of Alabama and her place of residence is unknown and  
that he has made diligent inquiry to ascertain her place of residence  
and is unable to ascertain her place of residence or her post office address  
and further, that, in the belief of said Affiant the Defendant is over the age of 28 years; it is,  
therefore, ordered that publication be made in the The Baldwin Times

a newspaper published in the County of Baldwin, State of Alabama, once a week for four  
consecutive weeks, requiring the said Defendant, Ada Watkins

to answer or demur to the Bill of Complaint in this cause by the 10th day of January

1918, or after thirty days therefrom a decree Pro Confesso may be taken against her.

*[Signature]*

Register.

*Howk S. Anderson*  
*Atty.*

No. 59

THE STATE OF ALABAMA,

Baldwin County,

CIRCUIT COURT, IN EQUITY.

NOTICE TO NON-RESIDENT.

Eddie L. Watkins

Complainant

vs.

Ada Watkins,

Defendant.

Filed in office this 1st day of

December 1917.

*W. R. Dickerson*  
Register.

February 11th. 1918

Eddie L. Watkins,

Complainant

vs.

Ada Watkins,

Defendant.

The Complainant, by his solicitor,

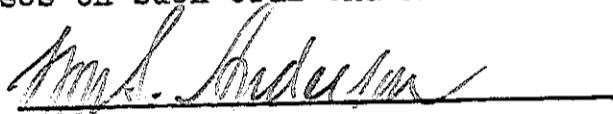
requests the oral examination of the following named witnesses, on  
his behalf, viz:-

Eddie L. Watkins, Weyman Blackman ~~and~~

~~George Henderson~~, said witnesses reside near Perdido, ~~in~~

Baldwin County, Alabama.

W. H. Hawkins Esq., who resides at Bay Minette, Alabama,  
is suggested as a suitable person to be appointed Commissioner to take  
the deposition of said witnesses on such oral examination.



Solicitor for Complainant

No. 59

Page \_\_\_\_\_

Eddie L. Watkins

vs.

Ada Watkins

DEMAND FOR ORAL EXAMINATION

Filed February 11th 1918,

J. W. Hillman

Register.



CIRCUIT COURT, IN EQUITY

THE STATE OF ALABAMA,  
Bellevue }  
County.

To: W. H. Hawkins Esq., Bay Minette, Ala.

KNOW YE, That we, having full faith in your prudence and competency, have appointed you Commission-

ers, 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 Raddie L. Watkins and Wamon Blackman

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of

Bellevue County, of said State, wherein

Raddie L. Watkins, is

Complainant

and Ada Watkins is

Respondent, questions propounded by Complainant's Solicitor, on oral

on oath to be by you administered, upon ~~interrogatory~~ examination before you

to take and certify the deposition, and return the same to our Court, with all convenient speed,

under your hand.

Witness  
12th day of February 1918.

Register:

*W. H. Hawkins*

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

E. F.  
 G. H.

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. 59

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

Eddie L. Watkins  
 vs.  
 Ada Watkins

Complainant  
 Defendant

COMMISSION TO TAKE DEPOSITION  
 ON INTERROGATORIES ORAL  
 Examination  
 COMMISSIONERS:

WITNESSES:

THE STATE OF ALABAMA,

No. 59.....

Baldwin.....County.

CIRCUIT COURT IN EQUITY.

Eddie L. Watkins.....

Complainant.....

vs.

Ada Watkins.....

Defendant.....

DEPOSITION OF Eddie L. Watkins & Wagon Blackman.....

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, W. H. Hawkins,.....the Commissioner named in said Commission, have called and caused to come before me.....

Eddie L. Watkins, and Wagon Blackman.....

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:

Deposition of Eddie L. Watkins:

My name is Eddie L. Watkins, and I am a bona fide resident of Baldwin Conty, Alabama, and am over the age of 21 years, and have been a resident of Alabama more than three years next before the filing of the bill in this case.

I was married to Ada Watkins on or about the 4th day of April 1915, in the town of Henegar, DeKalb County, Alabama. Her name was Ada Bobo before we were married. After we were married, we moved to Baldwin County, Alabama, in March 1916, where we lived until she left some time the latter part of 1916, and I have never seen her since, and I have never heard directly from her, but I have been informed that she has left the State of Alabama. I have made diligent inquiry, but have not been able to find her place of residence or post office address. She is over the age of 18 years.

In the month of July 1916, I found that she was going with one Carl Henderson. I found Carl Henderson at my house two or three times, with her, and I knew of her going with him on various occasions, and on several occasions, I saw them in very close conversation, apart from any one else; they seem to be very intimate with each other. Their associations with each other, was talked about in the neighborhood, and I had ever reason to suspect that they were guilty of adultery. She left my house, and went off about two miles and stayed with one of the neighbors, and during

that time, Carl Henderson went there frequently to see her. She never came back to me, but after spending two or three weeks at the neighbor's house, she went away somewhere, and I have never heard from her ~~since~~ since.

I have never lived with Ada Watkins or done any thing to condone any act of adultery after I was satisfied that she had committed adultery with Carl Henderson.

*Eddie L. Watkins*

Deposition of Waman Blackman:

Waman Blackman being sworn says:

My name is Waman Black man, and I am 20 years of age and live near Perdido, Baldwin County, Ala. I knew Eddie L. Watkins and Ada Watkins his wife from the time they came to Perdido in 1916. I was at their house quite a number of times while they lived there. I lived about a mile from them. I know that he always treated her as a man should treat his wife. I also knew Carl Henderson, and knew that he was a frequent visitor to Ada Watkins. Carl Henderson told me that he had had sexual intercourse with her several times. One Sunday evening in July 1916, I went with Carl Henderson to the house where Eddie Watkins and his wife lived, and when we got there, Eddie Watkins was not at home, and we found Ada Watkins with another young woman.

Carl Henderson and Ada Watkins went back into the kitchen, and stayed there some time while I remained in the room with the other young woman. During this time, a young man came there also and he and the young woman who was with me went out on the porch, and ~~afterward~~ they had gone out, I lay down on the bed awhile, I went out to the kitchen to see what Ada Watkins and Carl Henderson were doing. They were sitting on a trunk or bench right close together, in one corner of the kitchen, and he had her dress up above her knees and had his hand on her leg. I then went back and lay down on the bed again. Carl Henderson was in the kitchen with Ada Watkins for over two hours. After Carl and I left there, on our way home, Carl told me that he had screwed her twice while they were in there.

On another occasion after she left Eddie Watkins home, I saw her go into an unoccupied house, and after she had been in there some ten or 15 minutes, I saw a man come out of the house and walk off, leaving Ada Watkins in the house. This man was not Carl Henderson.

*Waman Blackman*

I, W. H. Hawkins, the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by me as near as might be in the words of the witness, and were read over to them, that they assented, swore to and subscribed the same in my presence, the 12th day of February, 1918, 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 12th day of February, 1918  
W. H. Hawkins (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, \$ 2.50  
W. H. Hawkins

No 59 Page.....

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Eddie L. Watkins  
 vs.  
Ada Watkins

DEPOSITION TAKEN BEFORE  
 COMMISSIONER

DEPOSITION OF  
Eddie L. Watkins,  
Weyman Blackman

for Complainant.

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

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

Register.

CIRCUIT COURT, IN EQUITY.

THE STATE OF ALABAMA,  
Baldwin County. }

No. 59 Term, 1918

Eddie L. Watkins Complainant

vs.

Ada Watkins Defendant

To J. W. Richardson, 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 Wm. S. Anderson, Per Solicitor

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.

Wm. S. Anderson  
Solicitors for Complainant.

No. 59 Page .....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Eddie L. Watkins

vs.

Ada Watkins

REQUEST FOR DECREE IN  
VACATION.

Filed Feb 12<sup>th</sup> 1918

Register.

Recorded in.....Record

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

Register.

Eddie L. Watkins

THE STATE OF ALABAMA,  
Baldwin County.

vs.

IN EQUITY,  
CIRCUIT COURT OF

Ada Watkins

Baldwin COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, *Decem 1904*

Depositions of Eddie L. Watkins

" " Newton Glasgow

" "

and in behalf of Defendant upon



No. 59

THE STATE OF ALABAMA,

Baldwin County.

IN EQUITY,

CIRCUIT COURT OF

Baldwin COUNTY.

Eddie L. Watkins

vs.

Ada Watkins

NOTE OF TESTIMONY.

Filed in Open Court this 17<sup>th</sup>  
day of February 1918.

Register.

THE STATE OF ALABAMA ) No. 59 Circuit Court, In Equity.  
Baldwin County. )

Eddie L. Watkins, ..... Complainant.

vs.

Ada Watkins, ..... Defendant.

This cause coming on to be heard in Vacation, was submitted upon the Bill of complaint, decree pro confesso on proof of publication, and testimony as noted by the Register; and upon consideration thereof, the Court is of the 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 Eddie L. Watkins is forever divorced from the said Ada Watkins for and on account of acts adultery committed by her with Carl Henderson, as alleged in said Bill of Complaint.

It is further ordered, that the said Eddie L. Watkins 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 Eddie L. Watkins pay the costs herein taxed, for which execution may issue.

It is further ordered, adjudged and decreed that said Eddie L. Watkins shall not marry again except to said Ada Watkins until sixty days after this date, and if an appeal is taken within sixty days, he shall not marry again except to said Ada Watkins during the pendency of said appeal.

This 13<sup>th</sup> day of February 1918.

W. G. Gandy

Judge of the Circuit Court of Baldwin County, Ala.

Recorded on Minutes  
Page 17

Decree of Divorce

Filed 2/14-1918  
J. W. Nicholson  
Register

Recorded on Minutes  
Page 17

Decree of Divorce

Filed 2/14-1918

J. H. Dickinson  
Register