

THE STATE OF ALABAMA,  
Baldwin County.

No. 64

CIRCUIT COURT, IN EQUITY.

Joseph Jefferson Wooten Complainant

vs.

Emmie Wooten Defendant

In this cause it appears to the Register

that a summons requiring the Defendant Emmie Wooten

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 Emmie Wooten

was served upon her by the Sheriff of Escambia County, Alabama, on the

16th day of January 1918, 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 Rickerby, Austill & Beebe, Solicitors for Complainant,

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 Emmie Wooten

Defendant aforesaid.

This 18th day of February 1918

*J. O. Rickerby*

Register.

No. *144* Page.....

THE STATE OF ALABAMA  
*DeKalb* County.

CIRCUIT COURT, IN EQUITY.

*Joseph Jefferson*  
*Wooten*

vs.  
*Emmie*  
*Wooten*

DECREE PRO CONFESSO ON  
PERSONAL SERVICE.

Issued *Feb. 18* *1918*  
*For Recurrence*  
Register.

Recorded in.....Record,

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

*Wooten*  
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 Emmie Wooten

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

Joseph Jefferson Wooten

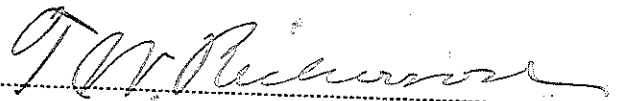
against said

Emmie Wooten

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 12th day of January

1918/



Register.

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

*Original*

Serve on *Emmie Wooten*, Mortimer, Ala.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

Received in office this .....  
day of ..... 191.....

No. 64.

Sheriff.

SUMMONS.

Executed this *16th* day of

*Joseph Jefferson Wooten*

191*8*

by leaving a copy of the within Summons with

*Emmie Wooten*

Defendant

vs.

Sheriff

By *J. H. ...*

Deputy Sheriff.

*Emmie Wooten*

*Rickaby Austill and Deboe*

Solicitor for Complainant.

Recorded in Vol. .... Page .....

*Rec'd in office at  
Mortimer, Ala. Court*

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

No. 64

Complainant

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 Com-

plaint 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 hereto-

fore existing between the Complainant and Defendant be, and the same are hereby dissolved; and the said

is forever divorced from the said

for and on account of

*Joseph Jefferson Weaver*  
*Emma Weaver*  
returning abhorrent

as alleged in said Bill of Complaint;

It is further ordered, that the said *Joseph Jefferson Weaver* and *Emma Weaver*

be, and they are hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said

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 *Emma Weaver*

It is further ordered, adjudged and decreed that said *Joseph Jefferson Weaver* and *Emma Weaver*

shall not again marry except to said *Emma Weaver*

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

to *Emma Weaver* during the pendency of said appeal.

This *5th* day of *March* 1918

Judge of the Circuit Court of *Tallapoosa* County, Ala.

*W. B. ...*

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

County

I, *W. B. ...* 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

Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the

19*...*

Register.

Recorded on Minutes

No. 64 Page 20

THE STATE OF ALABAMA,

Barbour County.

CIRCUIT COURT, IN EQUITY.

COUNTY, ALA.

Joseph Jefferson Grotter

vs.

Emmie Grotter

DECREE OF DIVORCE.

Filed in office this 6th

day of March 1918

T. W. Redmon  
Register.

E. O. M.

THE STATE OF ALABAMA,

*Barbour* County.

No. ....

CIRCUIT COURT IN EQUITY.

*Joseph Jefferson Wooster* Complainant.

*Emmie Wooster* Defendant.

DEPOSITION OF *Catherine Wooster*

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, *Foster Hayes* the Commissioner named in said Commission,

have called and caused to come before me.

*Catherine Wooster*

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:

*Interrogatory First she says,  
My name is Catherine Wooster  
and the mother of Joseph  
Jefferson Wooster. I know  
Emmie and Joseph Jefferson  
Wooster. I was living with  
them at the time they separated  
they are married. I knew  
them on Jan 10, 1916, and  
was living with them on  
that date. They were living  
at Jack Springs. Emmie  
Wooster on that date abandon-  
ed Joseph Jefferson Wooster,  
that is she refused to  
go with him to his new  
home. He did not give  
her cause not to go with  
him. He asked her to with  
him and she said she was*

not going. I know that  
he did not give her cause  
or excuse for abandoning  
him. Her quitting him was  
voluntary. They have not  
lived together since they  
were  
witness  
Catherine <sup>her</sup> Wooten  
Mark



I, Foster Hayles the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by W. C. Beebe 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 2nd day of March 1918, at Lathe 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 2nd day of March 1918  
Foster Hayles (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. 64 Page.....  
 THE STATE OF ALABAMA,  
 County.....  
 CIRCUIT COURT, IN EQUITY.  
 vs.  
 DEPOSITION TAKEN BEFORE  
 COMMISSIONER  
 DEPOSITION OF  
 for.....  
 Filed March 4<sup>th</sup> 1918  
 Published by order of Court,  
Wm. G. C. 1918  
W. C. Beebe Register.

THE STATE OF ALABAMA,

No.....

Baldwin County.

CIRCUIT COURT IN EQUITY.

Joseph Jefferson Wooten Complainant

vs.

Emmie Wooten Defendant

DEPOSITION OF Eugene Ard

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, Foster Hayles the Commissioner named in said Commission, have called and caused to come before me

Eugene Ard

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 interrogatory first he says:

My name is Eugene Ard. I know Joseph Jefferson Wooten and Emmie Wooten. They are married. I knew them on January 10, 1916, they were living at Jack Springs, and on Jan 10, 1916 Joseph Jefferson Wooten went to Patch to get work and she refused to go with him. I do not know of any cause or excuse he gave her not to live with him. They have not lived together since that time. Jeff was about 70 years old and Emmie about eighteen.

Eugene Ard

I, Foster Hayles the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by W. C. Beebe 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 2nd day of March, 1918, at Rattle 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 2nd day of March, 1918  
Foster Hayles (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.

vs.

DEPOSITION TAKEN BEFORE  
 COMMISSIONER

DEPOSITION OF

for.....

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

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

Register.

THE STATE OF ALABAMA,

No. ....

*Barbour* County.

CIRCUIT COURT IN EQUITY.

*Joseph Jefferson Wooster* Complainant.

*Emmie Wooster* Defendant.

DEPOSITION OF *Joseph Jefferson Wooster*

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, *Foster Hayles* the Commissioner named in said Commission,

have called and caused to come before me.

*Joseph Jefferson Wooster*

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 Interrogatory first he says:  
My name is Joseph Jefferson Wooster I am 72 yrs old, I live at Fetter, Ala. I have lived in Barbour County about five months. I have lived in Alabama all my life except two years. I have been in Alabama for three years continuously next preceding filing bill in Circuit Court for divorce against Emmie Wooster. I am the complainant in such cause. I know Emmie Wooster. I am her husband. We were married Nov 16, 1915, at Jack Springs Ala. She is about 70 years old.

To Interrogatory should be  
says. Emma Wooten volun-  
tarily abandoned me on Jan  
10, 1916, we were living at  
Jack Springs. I made to  
get work and she refused  
to go with and said she  
would not live with  
me. she went to her  
father's house. She gave  
no reason. We have not  
lived together since then,  
witness  
W. Beck Joseph Jefferson <sup>her</sup> Wooten  
Mark

I, Goster Hayes the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by W.C. Duke 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 2nd day of March 1918, at Louis 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 2nd day of March 1918  
Goster Hayes (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.

vs.

DEPOSITION TAKEN BEFORE  
 COMMISSIONER

DEPOSITION OF

for.....

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

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

Register.....

THE STATE OF ALABAMA,

No. ....

*Balmain* County: }

CIRCUIT COURT IN EQUITY.

*Joseph Jefferson Wooten* Complainant.  
vs.  
*Emmie Wooten* Defendant.

DEPOSITION OF *E. E. Ard*

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, *Foster Hayles*, the Commissioner named in said Commission,

have called and caused to come before me *E. E. Ard*

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:

*In answer to interrogatory, first he says:  
My name is E. E. Ard. I know Emmie and Joseph Jefferson Wooten. They are husband and wife. I knew them on January 10th, 1916. They were living at Jack Springs, Ala. Joseph Jefferson Wooten was twenty years old. Emmie was about eighteen. On Jan 10, 1918, Jeff moved to Pough. Emmie did not move with him. I do not know nor have I heard of any cause he gave her not to live with him. I have heard that she refused to move with him and to live with him. They have not lived together since the time E. E. Ard*

I, Foster Hayles the said Commissioner, hereby certify that the foregoing testimony was taken down in writing by W. C. W. W. W. 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 2nd day of March 1918, at Patton 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 2nd day of March 1918  
Foster Hayles (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.

vs.

DEPOSITION TAKEN BEFORE  
 COMMISSIONER

DEPOSITION OF

for.....

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

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

Register.



Joseph Jefferson Wooten) IN THE CIRCUIT COURT OF BALDWIN  
O  
Vs. O COUNTY, ALABAMA.  
O  
Emmie Wooten O IN CHANCERY

Interrogatories propounded to *E. E. Arden Eugene D. witnesses*  
for complainant in above styled case by the attorneys for  
said Complainant.

1st. What is your name? DO you know Emmie Wooten  
and Joseph Jefferson Wooten? Are they husband and wife?  
Did you know them on the 10th day of January, 1916? How  
old was each on that day? Where were they living? Did  
Emmie Wooten on that date abandon said Joseph Jefferson  
Wooten without fault on his part? Do you know of any  
cause which he gave to her to leave him? Have they lived  
together as husband and wife since said date?

*Reuben A. Arden & Beebe*  
Attorneys for Complainant

State of Alabama)  
Baldwin County, Al

Before me, Cornelia Hall, a Notary Public in and  
for said County and State, this day personally appeared  
W.C. Beebe, one of the Attorneys for Complainant in the cause  
of Joseph Jefferson Wooten versus Emmie Wooten, pending in  
the Circuit Court of Baldwin County, Alabama, in Chancery,  
who being duly sworn deposes and says that the answers to the  
foregoing questions propounded to witnesses above named will  
be material to the cause of the said complainant.

*W.C. Beebe*

Sworn to and subscribed before me this the 1st  
day of March, 1918.

*Cornelia Hall*  
Notary Public, Baldwin County,  
Alabama.

Complainant suggests \_\_\_\_\_, as a suitable per-  
son to take evidence of said witness under above interrogatories.

*Reuben A. Arden & Beebe*  
Attorneys for Complainant.

JOSEPH JEFFERSON WOOTEN

VS

EMMIE WOOTEN.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN CHANCERY.

Interrogatories propounded to Joseph Jefferson Wooten, witness for complainant in above styled case by the attorneys for said complainant.

1st. What is your name? How old are you? Where do you reside? How long have you resided in Baldwin County, Alabama? Have you resided in this State and County for three years next preceding filing of your bill of complainant against Emmie Wooten in the Circuit Court of Baldwin County, Alabama? Are you the complainant named in such bill of complaint? Do you know Emmie Wooten? Are you and she husband and wife? When and where were you married? How old is she?

2nd. Did Emmie Wooten voluntarily abandon you without your fault on the 10th day of January, 1916? Where were you living at that time? What did she say when she left? Did she give any reason for leaving you? Did she say that she ever expected to live with you again? Have you and she lived together as husband and wife at any time since that date?

*Richard, Custell & Beebe*  
Attorneys for Complainant.

State of Alabama. :  
Baldwin County : :

Before me, Cornelia Hall, a Notary Public in and for said State and County, this day personally appeared W.C. Beebe, one of the attorneys for complainant in the cause of Joseph Jefferson Wooten, versus Emmie Wooten, pending in the Circuit Court of Baldwin County, Alabama, in Chancery, who being duly sworn deposes and says that the answers to the foregoing questions propounded to witness above named will be material to the cause of the said complaint.

*W.C. Beebe*

Sworn to and subscribed before me this the 1st day of March, 1918.

*Cornelia Hall*  
Notary Public, Baldwin County, Alabama.

Complainant suggests , as a suitable person to take evidence of said witness under above interrogatories.

*Richard, Custell & Beebe*  
attorneys

THE STATE OF MICHIGAN,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

To Foster Hayles

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 Joseph Jefferson Wooten, Catherine Wooten,

E.E.Ard and Eugene Ard

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

Joseph Jefferson Wooten

Complainant

and

Emmie Wooten

Respondent,

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

Witness 28th day of March 1918

[Signature] Register.



THE STATE OF ALABAMA,  
Baldwin }  
..... County.

No. 64 ..... CIRCUIT COURT IN EQUITY.

Joseph Jefferson Wooten ..... Complainant.....

vs.

Emmie Wooten ..... Defendant.....

Motion is hereby made for a Decree Pro Confesso against..... Emmie Wooten.....

..... 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 18th ..... day of February ..... 19 18

*Richard Austell Bush*  
Solicitor.

No. 64.....

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THE STATE OF ALABAMA,

.....County,

CIRCUIT COURT, IN EQUITY.

*Joseph Jefferson*  
*Wooten*

vs.

*Eunice*  
*Wooten*

MOTION FOR DECREE  
PRO CONFESSO ON  
PERSONAL SERVICE.

Filed Feb 18.....1924

*T W Reardon*  
Register.

Recorded in.....Record

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

Register.

Joseph Jefferson  
Wooten

THE STATE OF ALABAMA,  
Bolivar County.

vs.  
Emmie Wooten

IN EQUITY,  
CIRCUIT COURT OF

Bolivar COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, *deceit*  
*pro confesso and testimony on*  
*behalf of Complainant*

and in behalf of Defendant upon

J. Williams  
Agent

No. 64

THE STATE OF ALABAMA,  
Baldwin County.

IN EQUITY,  
CIRCUIT COURT OF  
Baldwin COUNTY.

Joseph Jefferson Gorton

vs.

Emmie Gorton

NOTE OF TESTIMONY.

Filed in Open Court this 4<sup>th</sup>  
day of March 1918

J. M. McQuinn  
Register.



Filed 12/29/18  
D. W. Riccardi  
Register

F. R.

---

RICKARBY, AUSTILL & BEEBE  
Lawyers  
Bay Minette, Alabama

Orator further prays that upon the final hearing of this cause, your Honor will render a decree forever dissolving the bonds of matrimony existing between your Orator and the said EMMIE WOOTEN; and that Your Honor will further decree that your Orator may again contract matrimony. Orator prays for such other further <sup>or</sup> ~~and~~ different relief as he may be entitled to in equity and good conscience.

*Richardy Austell & Beebe*  
Solicitors for Complainant.

FOOT NOTE:

The Defendant is required full, true and sufficient answer to make to each and every paragraph of this bill of complaint, from one to three inclusive, but not under oath. Her oath is hereby waived.

*Richardy Austell & Beebe*  
Solicitors for Complainant.

64

JOSEPH JEFFERSON WOOTEN,  
COMPLAINANT

VS

EMMIE WOOTEN,  
DEFENDANT.

IN THE CIRCUIT COURT  
OF BALDWIN COUNTY, ALABAMA.  
SITTING IN CHANCERY.

TO THE HONORABLE A.E. GAMBLE, CIRCUIT JUDGE OF BALDWIN  
COUNTY, ALABAMA, SITTING IN CHANCERY:

Your Orator, JOSEPH JEFFERSON WOOTEN, humbly  
complaining against EMMIE WOOTEN, ne EMMIE GRESSETT,  
respectfully shows unto YOUR HONOR as follows.

FIRST: Your Orator and the same EMMIE  
WOOTEN are each over the age of Twenty-one years. Your  
Orator resides at Lottie in Baldwin County, Alabama, and  
has resided in said County and State continuously for more  
than three years next preceding the filing of this, his  
bill of complaint; the said EMMIE WOOTEN resides at Mort-  
imer, Escambia County, Alabama.

SECOND: Your Orator and said EMMIE WOOTEN are  
husband and wife, having intermarried in Escambia County,  
November 18, 1915.

THIRD: The said EMMIE WOOTEN voluntarily aban-  
doned complainant without fault on his part on, to-wit,  
the 10th day of January, 1916, since which date your Orator  
and said EMMIE WOOTEN have not lived together as husband  
and wife.

Premises considered, your orator prays that your  
HONOR will take jurisdiction of this cause and that the  
State's writ of subpoena issue to the said EMMIE WOOTEN  
citing her to Plead, answer or demur to the allegations of  
this bill of complaint, within the time allowed by law and  
according to the practice of this Honorable Court. Your