

498

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 Charles Anderson,

51 East 42nd Street, Chicago, Illinois.

of Chicago, Ill, ~~Ill~~ 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

Aretha Anderson,

against said

Charles Anderson,

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 22nd day of April

1925

Register.

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

Serve on _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

vs.

*Copy of Bill &
Summons sent
by Reg. mail to
Deft Apr 28/920
51 E 42nd St Chicago
Ill.*

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this _____
day of _____ 192

Sheriff.

Executed this _____ day of _____
192

by leaving a copy of the within summons with

Defendant.

Sheriff.

By _____
Deputy Sheriff.

The State of Alabama, }
Baldwin County.

No. 498. CIRCUIT COURT, IN EQUITY

Aretha Anderson, Complainant

vs.

Charles Anderson, 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.

~~Cruelty on account of cruelty~~

It is further ordered, that the said Aretha Anderson, be, and she 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 Aretha Anderson, 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 Charles Anderson

It is further ordered, adjudged and decreed that said Aretha Anderson, shall not again marry except to said Charles Anderson, until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Charles Anderson, during the pendency of said appeal

This 27th day of June 1925
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 _____ 192____, 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 _____ day of _____ 192____

Register.

No. 498

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Aretha Anderson

vs.

Charles Anderson.

DECREE OF DIVORCE.

Filed in office this *30th*

day of *June*, 192*5*

J. W. Richardson
Register.

E. O. M.

RECORDED
RECORDED

379
[Handwritten signature]

51 E. 42nd Street

Chicago

Chicago Ill;

Sept. 17th, 1925,

Dear Sir,

I recieved your letter a few days ago given the information I was seeking in regards to the divorce case between Aretha Anderson and Chas. Anderson..

I am enclosing a money order of one dollar for a copy of the decree of the above case.

Thanking you very much for your courtesy I remain,

Respectfully yours;

Chas Anderson

ARETHA ANDERSON,
Complainant,

-vs-

CHARLES ANDERSON,
Respondent.

IN EQUITY.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Comes Charles Anderson, Respondent in the above styled cause, and for answer to the allegations contained in said bill says:

FIRST: He admits all allegations as to the name, age, residence and marriage of the parties.

SECOND: He denies all other allegations therein contained.

Having thus fully answered Respondent prays that the bill may be dismissed and he be permitted to go hence with his reasonable costs in this cause expended.

Chas Anderson:
Respondent.

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

ARETHA ANDERSON,
Complainant,

-vs-

CHARLES ANDERSON,
Respondent.

ANSWER.

*Fried May 2/925 -
D. W. Resler
Register*

RECORDED

RECORDED

RECORDED

ARETHA ANDERSON,
Complainant,

-vs-

CHARLES ANDERSON,
Respondent.

IN EQUITY.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Comes the Respondent and waives notice of Complainant's application for permission to take testimony in this cause, the right to cross-examine Complainant's witnesses or to offer evidence in his own behalf.

He further agrees that said case may be set down for hearing and submitted for final decree without further notice to him upon the pleadings and Complainant's evidence.

Chas Anderson
Respondent.

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

ARETHA ANDERSON,
Complainant,

-vs-

CHARLES ANDERSON,
Respondent.

WAIVER OF NOTICE.

*Filed May 2/1925 -
J. N. Richardson
Register*

RECORDED

RECORDED

RECORDED

Arthur Anderson

CIRCUIT COURT OF

No 498, vs.

Charles Anderson

.....COUNTY.

IN EQUITY.

I, *T W Reardon*, Register of said Court, do hereby certify that I

did, on the *28* day of *April* 192*3*, send to

Charles Anderson Defendant.....

whose address was *51 - East 42nd St Chicago Ill.*

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the Bill

of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court; and that such

receipt was duly received and filed by me in this cause, on the *4th* day of *May* 192*3*

Witness my hand, this *5th* day of *May* 192*3*

T W Reardon
Register.

RECORDED

No. 488

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

Arctura Anderson

vs.

Charles Anderson

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 5

day of May 1925

T. W. Richmond

Register.

RECORDED

RECORDED

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

Comes ARETHA ANDERSON and by this her bill of complaint
against CHARLES ANDERSON, respectfully shows:

FIRST: That she is twenty years of age and is now and
has been all of her life a bona fide resident of Baldwin County,
Alabama, residing at Montrose except for a short period when she
was employed in Chicago. That Charles Anderson is also a resi-
dent of Alabama but is over the age of twenty-one years and is at
present employed in Chicago.

SECOND: That on March 11th, 1924, while both she and
the Defendant above named were working in the North, they were mar-
ried in the City of Chicago and lived together as husband and wife
but a few days over three months when, because of his neglect, abuse
and cruelty, she left him on June 14th and returned to where her
mother was boarding, subsequently returning to Montrose where she
has been since September of 1924 and now resides.

THIRD: That within a short time from the beginning
of their married life the conduct of Defendant was one of neglect.
At the time of the marriage both of them were employed at good
wages but shortly after the marriage her husband gave up his po-
sition and lived upon her earnings; that he pretended to look for
work but reported no success though colored labor at that time was
in good demand. In addition to this, as time wore on, he contin-
ued to abuse and maltreat Complainant, finally using physical violence
as a result of which her health became seriously impaired. That he
struck her and in the month of September became even more violent
and beat her severely. Complainant put up with this in silence

rather than let her people know but was finally compelled to leave him and did so on June 14th, 1924, when she returned to her mother and later with her mother came back to her home in Montrose where she has largely regained her health.

FOURTH: Complainant specifically charges Defendant with using physical violence to her person, injuring her life and health, and further charges that from his conduct she had reason to fear for her life had she continued to live with him. That when she married she was in good health but in the three months of their married life had lost over twenty pounds in weight, much of which she has regained since her return South.

THE PREMISES CONSIDERED Complainant prays that Charles Anderson be made a party defendant to this bill, and, being at present outside of the State of Alabama so that personal service cannot be had upon him, be notified by registered mail of the filing of this bill and required to answer same within the time prescribed by law.

Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said Charles Anderson, granting her the right to marry again should she so desire, together with such other, further or different relief as to equity may seem meet.

Oriskany Beek Seely
SOLICITORS FOR COMPLAINANT.

NOTE:

Defendant is required to answer each allegation of the foregoing bill but not under oath.

Oriskany Beek Seely
SOLICITORS FOR COMPLAINANT.

STATE OF ALABAMA)
)
COUNTY OF MOBILE)

Before me, the undersigned Notary Public, personally appeared this day E. G. Rickarby, who, being sworn, says that he is of counsel for Aretha Anderson, Complainant in the foregoing cause; that said Aretha Anderson resides at Montrose in Baldwin County, Alabama, remote from any officer authorized to administer affidavits but that affiant is informed and believes, and on such information states that the Defendant, Charles Anderson, has been absent from the State of Alabama, more than six months so that personal service cannot be had upon him, and is now living at 51 East 42nd Street in the City of Chicago, Illinois, and is over the age of twenty-one years.

Elliott G. Rickarby

Subscribed and sworn to before me
this the 21st day of April, 1925.

Frances C. Stevens
Notary Public, Mobile County, Alabama.

Original Bill

Walter Anderson
vs
Hester Anderson

RECORDED

Filed Apr 28/925
J. W. McInnis
Register

RECORDED

RECORDED

RECORDED

RECORDED

RECORDED

we were married my husband was employed and so was I. After our marriage he quit work and lived on the \$14.00 a week that I made. Not only did he make me keep on working but he abused and treated me very badly. I stood this for a while though my health ran down but this had no effect on my husband except to make him meaner to me than ever. He did not strike me at first but later on commenced illtreating me and in the month of June he became enraged and beat me severely. I had put up with this up to this time and did not let my people know it but after this last beating I had lost so much weight and was feeling so bad that I feared that he would cause my death if I stayed with him longer so I left him and went back to my Mother and have stayed with her ever since. I am now living with her in Montrose and have largely regained my health. I lost over twenty pounds in the three months that I lived with my husband and feel that if I had continued to do so with his ill-treatment, neglect and beatings I would have died. He did not work at all as I said before while we were married but when I quit him he went at once and got a job. His excuse had been up to that time that he could not find the proper kind of employment but I know now that he simply married me to have some one support him.

Aretha Anderson

FRANCES WILLIAMS.

I am the sister of the Complainant in this cause and was living and working in Chicago last year when she was. My sister is twenty years of age now and has always been a resident of Alabama, as is her husband, though they had been working up North off and on for the last year or so. I know nothing of my own knowledge about Charles Anderson beating my sister though when she married him she was strong and healthy. They did not live with us but we noticed that soon after her marriage she commenced to lose

flesh and was soon looking very thin and bad. We knew there was something wrong with her but she would not confess what the trouble was until in June she came back to us looking just a shadow of her former self and told us of her husband's cruelty and how he had beat her and she feared he would kill her if she stayed longer. After she came back to her Mother and me she commenced to improve and after she came back home with us in the fall and got away from her husband she has picked up the more than twenty pounds that she lost when with him. Since June 14th she has been living in the same house with me and I know of my personal knowledge that she has not seen her husband or had anything to do with him whatever.

Frances Williams.

VIRGINIA SAMUELS.

The Complainant in this case is my daughter. She married in March, 1924, in Chicago but she and her husband did not live together but three months. Soon after she married she commenced looking thin and bad and while I did not see her more than once or twice a month I knew that something was wrong with her from her appearance, she grew so thin and seemed so weak and ill. She did not say anything about the trouble but when she left her husband in June she then confessed that he had been illtreating her and that he had finally beaten her so severely that she feared he would kill her if she stayed with him longer and hence she came back to me and has been with me ever since.

Virginia Samuels

C E R T I F I C A T E

I, Thomas O. Loftus, the commissioner named in the foregoing commission which issued out of the Honorable the Circuit Court of Baldwin County, Alabama, do hereby certify that in a certain cause pending in said court, wherein Aretha Anderson is Complainant and Charles Anderson is Defendant, under and by virtue of the power conferred upon me by said commission, I caused the said Aretha Anderson, Frances Williams and Virginia Samuels, who are known to me and who are known to me to be the identical witnesses named in the commission to come before me at the time and place hereinafter named, that is to say I caused the said Aretha Anderson, Frances Williams and Virginia Samuels to come before me at Montrose, Baldwin County, Alabama, on the 8th day of May, 1925; that said witnesses were first duly sworn by me as stated; that they were then examined by me and testified in response thereto as it is herein above written; that their testimony was by me reduced to writing as given by them and as near as might be in the identical language of the said witnesses and that after their testimony had been so reduced to writing, it was by me read over to the said witnesses who assented to and signed the same in my presence.

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

WITNESS my hand this the 8th day of May, 1925.

Thomas O. Loftus
Commissioner.

The State of Alabama, }
Baldwin County

CIRCUIT COURT.

To Thomas O. Loftus,

KNOW YE, That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Virginia Samuels, Frances Williams and Aretha Anderson,

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

Court of Baldwin County, of said State, wherein

Aretha Anderson,

Complainant

and Charles Anderson,

Defendant,

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

Witness 5th day of May 1925.

T. W. Beckman
Register.

Commissioners Fee \$ 2.50

Witness Fee's \$

No.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT.

Aratha Anderson

Complainant.....

vs.

Charles Anderson,

Defendant.....

COMMISSION TO TAKE DEPOSITION
ON INTERROGATORIES.

COMMISSIONER:

Thomas O. Loftus,

WITNESSES:

Minia Samuels, Frances Williams,

Aratha Anderson.

