

The State of Alabama, }
Baldwin County.

No. 500

CIRCUIT COURT, IN EQUITY

Elbert Lambert

Complainant

vs.

Carrie Lambert

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS, THEREFORE, Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the Complainant is forever divorced from the Defendant.

on account of adultery committed by Carrie Lambert the defendant,

It is further ordered, that the said Elbert Lambert 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 Elbert Lambert 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 Carrie Lambert

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

This 11th day of August 1925.

John D. Lugh
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. 500.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Elbert Lambert

vs.

Carrie Lambert.

DECREE OF DIVORCE.

Filed in office this

11th day of Aug, 1925

T. W. Richardson
Register.

E. O. M.

RECORDED

The State of Alabama,
Baldwin County.

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

Elbert Lambert Complainant.

VS.

Carrie Lambert Respondent.

I, T.W. Richerson,

as Register and Commissioner

have called and caused to come before me Elbert Lambert, Jim Hadley,

witness named in the Requirement for Oral Examination, on the 5th day of August

1925, at the office of Register

in Bay Minette, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Elbert Lambert,

doth depose and say as follows:

My name is Elbert Lambert. I live at Rabon, in Baldwin County, Alabama; I have lived in Baldwin County, Alabama, for more than three years, next preceding the filing of the bill in this case; I am fifty-four years of age; Carrie Lambert, at the time of the filing of the bill of complaint in this case was a resident of Baldwin County, Alabama; but is now sojourning in Molino, Florida; She is over twenty-one years of age; Carrie Lambert and your Complainant were married at Bay Minette, Baldwin County, Alabama, on the 14th day of January, 1925; that they lived together as man and wife until on or about, to-wit: the 25th day of March, 1925; That on or about, to-wit: the 23rd day of March, and several other dated, the respondent Carrie Lambert, committed the act of adultery with one Pat Stewart; that since the first act, the said Carrie Lambert often went out to meet the said Pat Stewart and finally got so bad that she and the said Pat Stewart stayed together for some time, that was after she had went away and left me; I often talked with Carrie Lambert and told her that I would not put up with her running around with Pat Stewart, and that I absolutely would not approve or consent to such conduct. The first time I saw Carrie Lambert and Pat Stewart commit the act of adultery was near my place, just a short distance from my place where I was and

and my children, I told her about it and told her that I would not permit such. I again saw them near my gate, Pat had slipped up to the house and she went out to meet him, and I have heard of them being together several times after that. In fact, Pat Stewart told me, that he had been out with my wife, and also stated that any other man that wanted to could. They got so bad and conducted themselves in such manner that it was the general talk of the community, and finally got so bad that an appeal was made to the Sheriff of Baldwin County, Alabama, to help stop them. The said acts of adultery were committed without my consent or approval, and I in no way have condoned said acts of adultery, but to the contrary, have refused to have anything to do with Carrie Lambert and have lived separate and apart from her, since the said acts above mentioned and am still living separate and apart from her. I in no way have condoned the said acts of Carrie Lambert, nor have I had any intercourse with her whatever.

Elbert Lambert

.....Jim Halley, a witness for the Complainant, being duly sworn, deposes and says as follows:

My name is Jim Halley, I live at Rabon, Baldwin County, Alabama; I am acquainted with Elbert Lambert, and Carrie Lambert, the Complainant and Respondent in the within styled cause; I have known Mr. Lambert for about ten years; I have known Carrie Lambert for about seven months; I lived near where Mr. Lambert and Carrie Lambert lived; about one-half mile away; I lived there all during the time that Elbert Lambert and Carrie Lambert lived together as man and wife; I had heard several times that Pat Stewart was going with Carrie Lambert, and having sexual intercourse with her; in fact Pat Stewart told me that he was, and that if I didn't believe it to follow him some night and he would show me; one night about the twenty-second of ~~March~~ in the early part of the night, I went with Pat Stewart to where Elbert Lambert and Carrie Lambert were living, and stopped, and sat down, and in a little while Carrie Lambert came out and walked right near me and went to where Pat Stewart was, just a few feet away; I was so close that I could hear them talking and could see what they were doing; Pat Stewart and Carrie Lambert committed the act of adultery at that time; It was the general talk of the neighborhood that Pat Stewart was going with Carrie Lambert, long before the above night. I watched them only one night, but Pat Stewart afterwards told me that he was still getting it all he wanted; and that anybody could get it that wanted to.

Jim Halley

ORAL EXAMINATION.

I, D. W. Richardson, as Register and Commissioner hereby certify

that the foregoing deposition... on Oral Examination was taken down in writing by me in the words of the witness u and read over to them and they signed the same in the presence of myself And Hon H M Hall Atty for Complainant. at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness u or had proof made before me of the identity of said witness u; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 8 day of Aug 1925

D. W. Richardson (L. S.)

NO. 500. PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Elbert Lambert

vs. Complainant

Carrie Lambert

Respondent.

Oral Deposition

Filed Aug 8th 1925

D. W. Richardson Register.

Recorded in

Record

Vol. Page

Register

Abstract of Docket, Circuit Court, in Equity

GEO. D. BARRETT & CO., PRINTERS

8541

No.	SOLICITORS	PARTIES	PLEADINGS FILED	REGISTER'S ENTRIES
500	The Karby Case vs Hall,	Albert Lambert Carrie ^{OS} Lambert		Bill filed May 2nd 1925 Summons signed " " " Service on Dept May 3rd 1925 June 5 1925 Decree for Refusal Aug 8th Deposition Aug 8 Request for Submission

No. *600* Page.....

The State of Alabama,
Baldwin County.

CIRCUIT COURT,
IN EQUITY.

Aug 10 Term, 19 *25*

ABSTRACT OF DOCKET

Elbert Lambert

vs.

Carrie Lambert,

THE STATE OF ALABAMA,

BALDWIN COUNTY

IN EQUITY,

CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
decree pro confesso, and testimony of Elbert Lambert and

Jim Hadley,

and in behalf of Defendant upon.....



Register

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No. 600

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Elbert Lambert

vs.

Levie Lambert

NOTE OF TESTIMONY.

Filed in Open Court this 8th

day of Aug 1925

J. W. Rickey

Register

RECORDED

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8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 500.

~~Case No. 500~~ Aug 10 Term, 1925

Elbert Lambert, Complainant

vs.

Carrie Lambert, Defendant

To T.W. Richerson, 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 Rickerby, Beebe & Hall,

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.

Rickerby Beebe & Hall
Solicitor for Complainant.

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Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Elbert Lambert

vs.

Carrie Lambert.

REQUEST FOR DECREE IN
VACATION

FILED August 8th, 1925

D. W. Pickens

Register

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RECORDED IN RECORD

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Register

The State of Alabama, }
BALDWIN COUNTY.

No. 500 CIRCUIT COURT IN EQUITY.

Elbert Lambert, Complainant...

vs.

Carrie Lambert, Defendant...

Motion is hereby made for a Decree Pro Confesso against

Carrie Lambert, 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.....ha...S... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 6th day of June 1925

Rickaby Beebe Stall
Solicitor.

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No. 500.

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STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Elbert Lambert,

Vs.

Carrie Lambert,

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed June 6th, 1925

T.W. Richardson
Register.

Recorded in Record,

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Register.

Baldwin Times Print, Bay Minette.

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The State of Alabama, }
Baldwin County.

No. 500.

CIRCUIT COURT, IN EQUITY

Elbert Lambert,

Complainant

vs.

Carrie Lambert,

Defendant

In this cause it appears to the Register,
that a Summons requiring the Defendant Carrie Lambert,

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 Carrie Lambert,

was served upon her by the Sheriff of Baldwin County, Alabama, on the
3rd day of May, 1925

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 Rickarby, Beebe & Hall 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 Carrie Lambert,

Defendant... aforesaid.

This 8th day of June, 1925

T. W. Rickarby
Register.

4th

No. 500 Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.

Edward Lambert

vs.

Carrie Lambert

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued June 8 1923

D. W. McIlwain
Register.

RECORDED

RECORDED

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 Carrie Lambert,

of Baldwin 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

Albert Lambert,

against said

Carrie Lambert,

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 2nd day of May

1925.

Register.

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

697 Original

2nd

Serve on

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County
In Equity

Received in office this *2nd*

No.

day of *May* 192*5*.

SUMMONS

Sheriff.

Albert Lambert,

Executed this *3rd* ~~day~~ *day* day of

May 192*5*

by leaving a copy of the within summons with

Carrie Lambert

Defendant.

vs. "

W. R. Stuart

Sheriff.

Carrie Lambert,

By *B. Q. Wiggins*
Deputy Sheriff.

At Residence of Pat

Stewart, Rabon Ala.

Rickerby Boebe & Hill.

Solicitor for Complainant.

RECORDED

Recorded in Vol. Page

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF CIRCUIT COURT
IN AND FOR BALDWIN COUNTY, ALABAMA. IN CHANCERY.

Comes the Complainant, Elbert Lambert, and humbly complaining against Carrie Lambert respectfully shows unto your Honor as follows:

FIRST.

That the Complainant is a resident of Baldwin County, Alabama and has been for more than three years next preceding the filing of this bill and that he is over the age of twenty-one years; that the respondent, Carrie Lambert, is a resident of Baldwin County, Alabama, and over the age of twenty-one years.

SECOND.

That the Complainant and the Respondent are husband and wife, having intermarried at Bay Minette, Alabama, on the 14th day of January, 1925; that they lived together as man and wife until on or about, to-wit the 25th day of March, 1925.

THIRD.

That on or about, to-wit March 23, 1925 and other dates, the Respondent, Carrie Lambert, committed adultery with one Pat Stewart; that said acts of adultery were committed in Baldwin County, Alabama, and without the consent or approval of the Complainant.

PRAYER.

Wherefore the premises considered Complainant prays that your Honor will take jurisdiction of the cause made by this bill of Complaint and by appropriate process make the said Carrie Lambert respondent to this bill of Complaint and require her to plead, answer or demur to this bill of Complaint within the time and under the penalties prescribed by law and the practice of this Honorable court.

The Complainant further prays that upon the consideration of this cause your Honor will grant to him a decree of absolute divorce from the said Respondent, Carrie Lambert, and the Complainant prays for such other, different and general relief as he may be in equity entitled to receive in the premises.

And thus Complainant will forever pray.

Rickaby Beebe & Stall
Solicitors for Complainant.

FOOT NOTE.

The Respondent, Carrie Lambert, is required to answer each paragraph of the foregoing bill of Complaint, numbered one to three, inclusive, but not under oath. Oath is hereby expressly waived.

Rickaby Beebe & Stall
Solicitors for Complainant.

300
1st

Filed May 2, 1925
D. W. McElwain
Register

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USE THIS SPACE FOR ADDITIONAL INFO

W. H. McElwain

MEMBERS OF BOARD OF SUPERVISORS

OF THE COUNTY OF ...

RECORDED FOR ...