

(541)

Clarice Agnes Gilmore Gottesfeld) Complainant,	}	In CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.
vs	}	In Equity.
Edward Davis Gottesfeld, Defendant.	}	

To the Hon. John D. Leigh, Judge of the Circuit Court of Baldwin County, Alabama:

~~The Bill of Complaint of Clarice Agnes Gilmore Gottesfeld~~
against Edward Davis Gottesfeld, respectfully shows to your Honor:

1.

That she is now nineteen years of age and is a bona fide resident of Fairhope, Baldwin County, Alabama; that the said Edward Davis Gottesfeld is over twenty-one years of age, and to the best of her knowledge in his forties, he is now confined in the Federal Prison at Atlanta, Georgia, she does not know what is his permanent residence, if he has one.

She shows to your Honor that she and the said Edward Davis Gottesfeld, were married in Bay Minette, Alabama, on the 4th day of May 1923, by the Rev. T. Y. Abernethy, a Methodist Minister; at the time of her marriage, she was living with her parents at Fairhope, in this County, where she had lived all her life; she was under the age of seventeen years, when she was married to said Edward Davis Gottesfeld. After their marriage they went immediately to South Bend, Indiana, where they lived in a flat for about a month, they then travelled about with a Circus Company, he doing athletic performances. He made a precarious living and was often without money and without work. She soon found that he was wanting in moral character and unworthy of her love and affection, and failed to earn enough for her support. She got her parents to send her money and returned to her home in Fairhope, on the 26th day of December 1923, where she has lived continuously ever since.

2.

Complainant shows to your Honor, that she ascertained that said Edward Davis Gottesfeld committed adultery with a woman named Ruth Kent, in the City of Mobile, Alabama, she had already known that he was immoral. She therefore charges him with adultery with

the woman Ruth Kent, in Mobile, Alabama; and she has in no way condoned said offense after knowledge of its commission. She also shows to your Honor, that she has been a bona fide resident of this state for more than one year next before the filing of this bill.

3.

Complainant further shows to your Honor that said Edward Davis Gottesfeld, the defendant, was indicted, tried and convicted in the District Court of the United States in and for the Northern District of Florida, at Pensacola, Florida, of the offense of Violation of the Mann Act; he was convicted on the 17th day of November 1924, and sentenced to the Federal Prison at Atlanta, Georgia, for a period of twenty months. The defendant was indicted under the name of Edward Gettes Feld, alias Edward Happy Felds, alias Happy Davis.

Complainant shows to the Court that the defendant, was generally called Happy Davis, by his friends and acquaintances.

Complainant further shows that in said indictment under which he was convicted, he was charged with transporting, a certain woman to-wit; one Ruth Kent from Pensacola, in the State of Florida, to Mobile in the State of Alabama, for immoral purposes.

Prayer for Process.

Wherefore Complainant prays that the State's writ of Subpoena be issued to the said Edward Davis Gottesfeld, and directed to him at the Federal Prison, Atlanta, Georgia, or wherever he may be found requiring him to plead, answer or demur to this Bill of Complaint within the time and according to the rules of this Court.

Prayer for Relief.

And Complainant prays your Honor, that you will take jurisdiction of this cause, and on the coming in of the evidence Your Honor will order and decree that the bonds of matrimony now existing between Complainant and defendant be dissolved, that she be divorced from the bonds of matrimony now existing between her and the said Edward Davis Gottesfeld, and that she may be permitted to marry again and for such other, further and different relief as to your Honor may seem meet and proper.



Solicitor for Complaint.

Note:

The defendant is required to answer each paragraph of the Bill from Paragraph 1. to Paragraph 3., both inclusive, but not under oath, his oath being expressly waived.

Wm. S. Anderson

Solicitor for Complainant.

State of Alabama)

Baldwin County.)

Before me T. W. Richerson, Clerk of the Circuit Court of Baldwin County, Alabama, personally appeared Wm. S. Anderson, who is known to me, and who after being by me first duly sworn, deposes and says: that he is the Solicitor for the Complainant in the above stated case; that the defendant in said case, Edward Davis Gottesfeld, is over the age of twenty-one years and is a non-resident of the State of Alabama, and since the latter part of November 1924 has been confined in the Federal Prison, at Atlanta, Georgia, and to the best of his knowledge and belief is still in said prison, under a conviction and sentence of the District Court of the United States for the Northern District of Florida, at Pensacola, Florida.

Subscribed and sworn to before me)
this 6th. day of November 1925.)

T. W. Richerson

Wm. S. Anderson

Clerk, Circuit Court, Baldwin County, Alabama.

The State of Alabama, }

BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 541. Vacation Term, 1926

Clarice Agnes Gilmore Gottesfeld

Complainants

vs.

Edward Davis Gottesfeld.

Defendants

Motion is hereby made for a Decree Pro Confesso against

Edward Davis Gottesfeld,

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication
and notice by Registered mail
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 24th day of February 1926

Wm S. Anderson

Solicitor.

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No. 541.

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STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Clarice Agnes Gottesfeld.

Complainants.

Vs.

Edward Davis Gottesfeld.

RECORDED

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed Feb 24 1926

J. M. [Signature]

Register.

Recorded in Record,

Vol. Page

Register.

Baldwin Times Print, Bay Minette.

The State of Alabama, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 541. April Term, 1926

Clarice Agnes Gilmore Gottsfeldt Complainants

vs.

Edward Davis Gottsfeldt Defendants

Motion is hereby made for a Decree Pro Confesso against Edward Davis Gottsfeldt,

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 3 day of April 1926

746 Code.

W. S. Anderson

Solicitor.

2/2
No. 541,

Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Agnes Gilmore Gottesfeldt.

Complainants.

Vs.

Edward Davis Gottesfeldt.

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed

April 3rd

1926

T. W. Richmond

Register.

Recorded in Record,

Vol.

Page

Register.

Baldwin Times Print, Bay Minette.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 541. Vacation Term, 1926.

Clarice Ages Gilmore Gottesfeld

Complainant

vs. Edward Davis Gottesfeld.

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 9th day of January 26, 1926, in the Bay Minette a newspaper published in Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 9th day of January 1926, and Copy of Bill & Copy of Summons Registered to Deft at his last known address.

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

Edward David Gottesfeld,

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

Edward Davis Gottesfeld,

This 1st day of March, 1926

D. W. Pileman
Register.

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No. 541-----

Page-----

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY

Clarice Agnes Gilmore Gottesfeld.

vs.

Edward David Gottesfeld

DECREE PRO CONFESSO ON
PUBLICATION.

Issued Mar 1st 1926.

T. W. Beckwith
Register.

RECORDED

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 541. April 5th, Term, 19. 26

Agnes Gilmore Gottesfeldt, Complainant.
vs. Edward Davis Gottesfeldt. Defendant.

In this cause it appears to the Register.....that the order of publication here-
tofore made in this cause, was published for four consecutive weeks, commencing on the 10th
December, 19. 26, in the Baldwin Times,
a newspaper published in Bay Mi nette, Alabama, that a copy of said order was posted at the Court
House door in Baldwin County, on the 10th
December, 19. 26, and

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

~~Agnes Gilmore Gottesfeldt.~~ Edward Davis Gottesfeldt

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, there-
fore, 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

This 5th day of April, 19. 26

T.W. Richerson
Register.

No. 541 Page

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY

Agnes Gilmore Cottesfeldt,

vs.

Edward Dais Cottesfeldt.

DECREE PRO CONFESSO ON
PUBLICATION.

Issued April 5th, 1926

T. W. Richardson
Register.

Recorded in Record

Vol. Page

Register.

RECORDED

8581 NOTE OF TESTIMONY

Clarice Agnes Gottesfeld,

vs.

Edward Davis Gottesfeld.

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 on publication and testimony of Clarice Agnes
Gottesfeld, and Mrs. E. C. Davis, and testimony of Willie Johnson,.....

and in behalf of Defendant upon.....

T. W. Richardson
Register.

8211 NOTE OF TESTIMONY

No. 541.

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Clarice Agnes Gilmore Gottesfel^d

VS

Edward Davis Gottesfeld.

NOTE OF TESTIMONY

Filed in Open Court this 18th
day of August, 1926.

T. W. Richardson

Register

MOORE PTG CO

RECORDED

The State of Alabama, }
Baldwin County.

No. 521.

CIRCUIT COURT, IN EQUITY

Clarice Agnes Gilmore Gottesfeld,

Complainant

vs.

Edward Davis Gottesfeld,

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 adultery of
Respondent with Mrs Ruth Kent*

It is further ordered, that the said Clarice Agnes Gilmore Gottesfeld 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 Defendant 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 Clarice Agnes Gilmore Gottesfeld,

It is further ordered, adjudged and decreed that said Clarice Agnes Gilmore Gottesfeld shall not again marry except to said Edward Davis Gottesfeld until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Edward Davis Gottesfeld during the pendency of said appeal

This 13th day of September 1926.

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. 521.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Clarice Agnes Gilmore Gottesfeld.

vs.

Edward Davis Gottesfeld.

DECREE OF DIVORCE.

Filed in office this

BRT

day of

Sept

, 192

D. M. Williams

Register.

E. O. M.

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

Clarice Agnes Gilmore Gottesfeld.

No. 542

vs.

Edward Davis Gottesfeld.

The State of Alabama,

Baldwin County.

Circuit Court, in Equity.

This the 9th day of

December, 1925

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

Wm S. Anderson Atty for Complainant,

that the Defendant Edward Davis Gottesfeld,

is a non-resident of the State of Alabama and since the latter part of
November, 1924, has been confined in the Federal Prison, at
Atlanta, Georgia.

and further, that, in the belief of said Affiant, the Defendant is over the age of 21
years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper publish-
ed in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring
the said Edward Davis Gottesfeld,

to answer or demur to the Bill of Complaint in this cause by the 9th day of
January, 1925, or after thirty days therefrom a decree Pro Confesso may be
taken against the said Edward Davis Gottesfeld.

J. M. Ricus
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 Edward Davis Gottesfeld,

of Atlanta Ga, ~~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 Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Clarice Agnes Gilmore Gottesfeld,

against said

Edward Davis Gottesfeld,

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 6th, day of

November, 1925.

T. W. Richerson Register.

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

CLARICE AGNES GILMORE GOTTESFELD^d,)

NO. 541.

VS)

EDWARD DAVIS GOTTESFELD^d.)

CIRCUIT COURT, BALDWIN
COUNTY, ALABAMA.
IN EQUITY.

The deposition of Willie Johnson, a witness examined on behalf of complainant in above entitled cause in the Circuit Court of Baldwin County, Ala., in Equity, the said witness appearing before me, F. J. Yerger, the undersigned commissioner, on the 30th day of July, 1926, at one o'clock, P.M., at No. 57 St. Francis Street, Mobile, Alabama, and the said witness having been first duly sworn by me to speak the truth, the whole truth and nothing but the truth, in answer to the questions propounded to him, in answer to the questions thereupon propounded to him by William S. Anderson, Esqr., Solicitor for the Complainant in said cause, did testify and say as follows, viz:

TESTIMONY OF WILLIE JOHNSON.

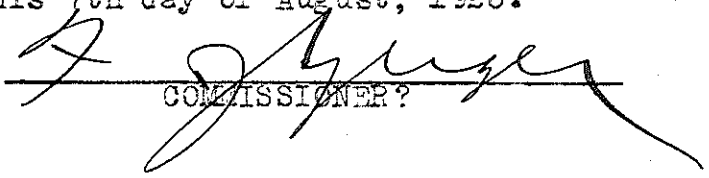
Willie Johnson, a witness for complainant, after being duly sworn deposes and says as follows: My name is Willie Johnson. I am forty-three years of age and reside in the city of Mobile, Alabama, and have lived there all my life. In 1924 and prior thereto I was working as bell boy at the St. Andrews Hotel, Mobile, and continued to work there until some time in 1925. I knew Edward Davis Gottesfeldt the defendant in this case. He was in the habit of stopping at the St. Andrews Hotel where I was working when he was in Mobile. I remember in the early Fall of 1924 that he stopped at the St. Andrews Hotel at the same time that Mrs. Ruth Kent was there, whom I also knew. Mrs. Ruth Kent came into the hotel one ^{evening} ~~evening~~ from L. & N. train No. 1., and he came in to the hotel from L. & N. train No. 3. I was on watch at the time he came about three o'clock in the morning, and I took him to the room in the hotel occupied by Mrs. Kent. I went into the room with him to carry some ice water, and Mrs. Kent at that time was in bed. They both occupied that room for the balance of the night. I was called back to the room to take them ice water, and saw them in bed together. I was, a month or two after that, summoned as a witness to Pensacola, Fla., to testify in the case of the United States against Edward Davis Gottesfeldt for violation of the Mann Act in taking Mrs. Ruth Kent to Mobile for immoral purposes, and

on the trial of the case I testified to the same facts as I have
stated above. The defendant was convicted at that trial for
said offence.

Willie Johnson

I, Frank J. Yerger, commissioner named in the foregoing commission, which issued out of the Honorable, the Circuit Court of Baldwin County, Alabama, sitting in Equity, do hereby certify that in a certain cause wherein Clarice Agnes Gottesfeldt is complainant and Edward Davis Gottesfeldt is respondent, being case No. 541 in the Circuit Court of Baldwin County, Alabama, in Equity, under and by virtue of the powers conferred on me, I caused Willie Johnson, a witness on behalf of the complainant in said cause, and who is known to me, and known to me to be the identical witness named in said commission, to come before me on the 30th day of July, 1926, at my office at 57 St. Francis Street, Mobile, Alabama; that said witness was first duly sworn by me to speak the truth, the whole truth and nothing but the truth in answer to the questions propounded to him; that he was examined on oral examination by William S. Anderson, Esqr., of Bay Minette, Alabama, Solicitor for the Complainant, and testified in response thereto as is hereinabove written; that said testimony was caused by me to be reduced to writing, as given by said witness and as nearly as might be in the identical language of said witness, and that after the testimony of said witness was so reduced to writing, his testimony was read over to him, and he assented to his testimony as so reduced to writing and signed his name thereto in my presence. I further certify that I am not of kin or counsel to either party to said suit and that I am not in any manner interested in the result thereof.

Witness my hand this 7th day of August, 1926.


COMMISSIONER?

The State of Alabama, }
Baldwin County

CIRCUIT COURT.
In Equity.

To F.J.Yerger or T.R.Foster,

KNOW YE, That we, having full faith in your prudence and competency, have appointed you Commission-
er, and by these presents do authorize you, at such time and place as you may appoint, to call before you and
examine

Willie Johnson,

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

is Complainant

and

Edward Davis Gottesfeldt,

is Defendant,

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

Witness 8th day of July 1926

T. V. Pinner
Register.

Commissioners Fee \$ 5.00

Witness Fee's \$

Largest Weekly Circulation in South Alabama

Bay Minette, Ala., 4/1/76

M. T. W. Richerson Co.

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FINE JOB PRINTING. BEST ADVERTISING MEDIUM

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Gattsfeld vs Gattsfeld # 541

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R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

NOTICE TO NON-RESIDENT

The State of Alabama, Baldwin County, Circuit Court, in Equity. This the 9th day of December, 1925. Clarice Agnes Gilmore Gottesfeldt, No. 541, vs. Edward Davis Gottesfeldt.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Wm. S. Anderson, Atty. for Complainant, that the Defendant Edward Davis Gottesfeldt, is a non-resident of the State of Alabama and since the latter part of November, 1924, has been confined in the Federal Prison at Atlanta, Georgia, and further, that in the belief of the said Affiant 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 Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Edward Davis Gottesfeldt, to answer or demur to the Bill of Complaint in this cause by the 9th. day of January, 1926, or after thirty days therefrom a decree Pro Confesso may be taken against the said Edward Davis Gottesfeldt.

T. W. RICHESON, Register.
Wm. S. Anderson, Atty. for Complainant. 45-46

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail, 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 _____

Was published in said Newspaper for 2 consecutive weeks in the following

issues:

Date of first publication	<u>Dec 10 1925</u>	Vol. <u>36</u>	No. <u>45</u>
Date of second publication	<u>17</u>	Vol. <u>36</u>	No. <u>46</u>
Date of third publication	<u>24</u>	Vol. <u>36</u>	No. <u>47</u>
Date of fourth publication	<u>31</u>	Vol. <u>36</u>	No. <u>48</u>

Subscribed and sworn to before the undersigned this 5th day of

April 1926
T. W. Richeson
Clerk Circuit Court.

R. B. Vail
Publisher.

The State of Alabama,
Baldwin County.

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

Clarice Agnes Gilmore Gottesfeld, Complainant.

VS.

Edward Davis Gottesfeld, Respondent.

I, T.W. Richerson,

as Register and Commissioner

have called and caused to come before me Clarice Agnes Gilmore Gottesfeld

Mrs. L.C. Gilmore,

witness named in the Requirement for Oral Examination, on the 18th day of August

1926, 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 Witnesses

doth depose and say as follows:

Clarice Agnes Gilmore Gottesfeld the complainant in this cause who had been duly sworn testified as follows:-

My name is Clarice Agnes Gilmore Gottesfeld. I am the complainant in this cause. At this time I am twenty years of age. I reside at Fairhope Alabama and have resided there all my life. I was married to Edward Davis Gottesfeld the defendant on May 4th, 1923 at Bay Minette Alabama, by the Rev T.Y. Abernathy, a Methodist Preacher. Edward David Gottesfeld at the time of our marriage was over the age of 21 years and was a non resident of the State of Alabama, if he had a permanent residence I do not know where it was, I had only known him about six months at Fairhope Alabama when I married him, after our marriage we went to South Bend Indiana, where we spent about a month; he then joined a travelling Circus Company, and spent several months in travelling over the country, after leaving the Circus Company, he was without work and made a precarious living; and we were often in difficulties about paying our Hotel bill. I soon found that he was wanting in moral character, and unreliable, and he failed to earn enough for my support. I got my parents to send me enough money to come home, and I reached home the day after Christmas 1923, and have lived there continuously

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

Clarice Agnes Gilmore Gottesfeld, Complainant.

VS.

Edward Davis Gottesfeld, Respondent.

I, T.W. Richerson,

as Register and Commissioner

have called and caused to come before me Clarice Agnes Gilmore Gottesfeld

Mrs. L.C. Gilmore,

witness, named in the Requirement for Oral Examination, on the 18th day of August 1926, 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 witnesses

doth depose and say as follows:

Clarice Agnes Gilmore Gottesfeld the complainant in this cause who had been duly sworn cause/testified as follows:-

My name is Clarice Agnes Gilmore Gottesfeld. I am the complainant in this cause. At this time I am twenty years of age. I reside at Fairhope Alabama and have resided there all my life. I was married to Edward Davis Gottesfeld the defendant on May 4th, 1923 at Bay Minette Alabama, by the Rev. T.Y. Abernathy, a Methodist Preacher. Edward David Gottesfeld at the time of our marriage was over the age of 21 years and was a non resident of the State of Alabama, if he had a permanent residence I do not know where it was, I had only known him about six months at Fairhope Alabama when I married him, after our marriage we went to South Bend Indiana, where we spent about a month, he then joined a travelling Circus Company, and spent several months in travelling over the country, after leaving the Circus Company, he was without work and made a precarious living; and we were often in difficulties about paying our Hotel bill. I soon found that he was wanting in moral character, and unreliable, and he failed to earn enough for my support. I got my parents to send me enough money to come home, and I reached home the day after Christmas 1923, and have lived there continuously

with my parents since December 26th, 1923, up to the date of filing the bill in this cause, I have been a bon afide resident of this State for more than one year next before the filing of the bill, I have never lived with the Defendant since I left him in December 1923. Somewhere about the first of November 1924, I first heard that he had committed adultery with a woman named Mrs. Ruth Kent, at the St. Andrews Hotel in the City of Mobile, I was satisfied before that that he was an immoral man but that was the first time that I had any information that he had committed adultery.

I was summoned as a witness for the Government in the case of the United States vs. Edward Davis Gottesfeld, at trial at Pensacola Fla, for the offense of a violation of the Mann Act, with Ruth Kent. I attended that Court as a witness but was put under the rule and did not hear the testimony of the other witnesses, I know that Edward Davis Gottesfeld the Defendant was convicted at that trial and was sentenced to the Federal Prison at Atlanta for a period of 20 months, The Defendant was indicted under the name of Edward Gettes, Feld, alias Ed and Happy Feld alias Happy Davis, I know as a matter of fact that he was generally called by his friends and acquaintances by the name of Happy Davis,

Since I first heard of his adultery with Ruth Kent in Nov 1924, I have never seen the defendant except in the Court Room during the trial and then I had no conversation with him, I have in no way condoned his act of adultery.

Gilmore
Clarice Agnes Gottesfeld

Mrs. L.C. Gilmore a witness for Complainant who had been duly sworn testified as follows: My name is Mrs. L.C. Gilmore, I am 52 years of age and reside at Fairhope Baldwin County Alabama, I am the mother of the Complainant in this case Clarice Agnes Gilmore Gottesfeld, She was under the age of 17 at the time of her marriage,

When I found out that they were determined to get married I came from Fairhope to Bay Minette and went before the Probate Judge and assisted in getting the license, we then went to the residence of T.F. Abernathy where they were married, they lived in Fairhope for about a month and then went off. Along in the fall of the year after they were married I heard that he was not providing for her properly, and some time in December 1923, Clarice wired me to send her money to come

home ,I sent her the money and she came home about ~~the~~ the 26th day
of December 1923, She has lived with me continuously from that
time up to this date ,I heard in the fall of the year ¹⁹²⁵ that he had
been arrested and taken to Pensacola for trial under the charge of
Violation of the Mann Act,I also heard that the woman in the case
was a Mrs. Ruth Kent,

Mrs L. C. Gilman

ORAL EXAMINATION.

I, T.W. Richerson, 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 witnesss and read over to them and they signed the same in the presense of myself and Hon.W.S.Anderson,Atty for Complainant, at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesss---or had proof made before me of the identity of said witness s---; 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 18th day of August, 1926.

T.W. Richerson (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Clarice Agnes Gilmore Gottesfeld,

vs. Complainant

Edward Davis Gottesfeld,

Respondent.

Oral Deposition

Filed August, 1926th, 1926.

T.W. Richerson, Register.

Recorded in

Record

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