

William Pierce

Complainant

vs.

Clara Lee Pierce

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 voluntary abandonment.

William Pierce,

It is further ordered, that the said

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 William Pierce,

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 Clara Lee Pierce,

It is further ordered, adjudged and decreed that said William Pierce

shall not again marry except to said Clara Lee Pierce,

until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Clara Lee Pierce, during the pendency of said appeal

This 8<sup>7L</sup> day of

June,

192<sup>6</sup>

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.

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 Clara Lee Pierce

of California 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  
William Pierce,

against said Clara Lee Pierce,

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 15th day of

May, 1926.

T. W. Richerson Register.

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

*Original*  
SERVE ON.....

**Circuit Court of Baldwin County  
In Equity.**

No. ....

**SUMMONS**

William Pierce

vs.

Clara Lee Pierce.

Pickarby, Eebs & Hall.

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.

*Copy of Bill & Summons  
Registered Dept.  
J. M. Rice  
Clerk*

The State of Alabama, }  
Baldwin County.

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

WILLIAM PIERCE ..... Complainant.

VS.

CLARA LEE PIERCE ..... Respondent.

I W. R. [Signature]

as Register and Commissioner

have called and caused to come before me

William Pierce & Jose

Pierce

witness named in the Requirement for Oral Examination, on the 7 day of June

1926, at the office of

Register

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

truth, the whole truth, and nothing but the truth, the said William Pierce

doth depose and say as follows:

My name is William Pierce. I am a resident of Point Clear, in Baldwin County, Alabama, and have been for more than three years next preceding the filing of the bill of complaint in this cause. I am over the age of twenty-one years. Clara Lee Pierce is over the age of twenty-one years, and is a non-resident of the state of Alabama, and when last heard from was a resident of 6305 Holmes Avenue, Los Angeles, California.

The said Clara Lee Pierce and I are husband and wife, having intermarried at Pascagoula, Mississippi, on May 11th, 1919. The said Clara Lee Pierce and I lived together as man and wife until on or about June 22, 1923.

On or about June 22, 1923, the said Clara Lee Pierce voluntarily and without any cause on my part went away and left my bed and board, and has remained away continuously since that time, of her own accord and without any fault on my part.

During the whole time that the said Clara Lee Pierce and I lived together as man and wife, I at no time mistreated her in any way, nor did I give her any cause for leaving me; after she went away I sent her money to come home on, and she wrote me that she was not coming back to live with me; during our whole married life, I at all times treated her in the best manner I knew how and at all time furnished her with all the necessities of life, so far as ability permitted.

William Pierce

Jesse Pierce, a witness for the Complainant, being duly sworn, deposes and says, as follows:

My name is Jesse Pierce. I am a resident of Point Clear, Baldwin County, Alabama. The Complainant William Pierce, is my brother, and is over the age of twenty-one years.

I know the respondent, Clara Lee Pierce, the wife of William Pierce. I remember about the time when Clara Lee Pierce and William Pierce, were married in Pascagoula, Mississippi.

William Pierce and Clara Lee Pierce lived together as man and wife until about June, 1923, when Clara Lee Pierce went away and left my brother; they have not lived together as man and wife since that time.

During the time that William Pierce and Clara Lee Pierce lived together as man and wife, I was around them quite a bit and always found that my brother William Pierce always treated Clara Lee Pierce as best he could and at no time gave her any cause for going away and leaving him. He at all time furnished her with necessary food and clothing, and at no time did I ever hear of Clara Lee Pierce accusing William Pierce of mistreating her in any way or ever denying her the necessities of life. She at no time made any complaint of mistreatment from William Pierce.

Jesse Pierce

ORAL EXAMINATION.

I, W. R. Ricumson, 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 he and read over to him and her signed the same in the presence of myself and Hon. A. McHall, Atty for Complainant at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness he or had proof made before me of the identity of said witness he; 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 7th day of June 1926

W. R. Ricumson (L. S.)

NO. 587 PAGE

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

William Price

vs. Complainant

Clara Lee Price

Respondent.

Oral Deposition

Filed June 7, 1926

W. R. Ricumson, Register.

Recorded in

Record

Vol. Page

Register

WILLIAM PIERCE,  
Complainant

vs.

CLARA LEE PIERCE,  
Respondent

IN THE CIRCUIT COURT,

BALDWIN COUNTY, ALABAMA.

IN CHANCERY.

Comes the Respondent, Clara Lee Pierce, and waives notice of the time and place of taking testimony in the above cause; the right to cross examine witnesses and consents that the cause be set down for final hearing upon the pleadings and evidence of the Complainant.

(Sign) Clara Lee Pierce Clara Lee Pierce.

STATE OF CALIFORNIA  
COUNTY OF

I, \_\_\_\_\_ a Notary Public in and for said County, in said State, hereby certify that Clara Lee Pierce, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day, that being informed of the contents of the instrument, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the \_\_\_\_\_ day of \_\_\_\_\_, 1926.

\_\_\_\_\_  
Notary Public.

= OS =

Charles P. ...

Filed May 28th 1926  
T. W. ...  
Register

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2017



William Pierce

587.

vs.

Clara Lee Pierce.

CIRCUIT COURT OF

Baldwin COUNTY.

IN EQUITY.

I, T.W. Richerson, Register of said Court, do hereby certify that I

did, on the 25 day of May 1926, send to

Clara Lee Pierce Defendant.

whose address was 6305 Homes Ave Los Angeles, Cal.

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 31st day of May 1926

Witness my hand, this 31st day of May 1926

T.W. Richerson Register.



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No. 587.

CIRCUIT COURT OF  
BALDWIN COUNTY.  
IN EQUITY.

William Pierce

vs.

Clara Lee Pierce.

RECORDED

CERTIFICATE OF REGISTER AS TO NOTICE  
BY REGISTERED MAIL.

Filed in office on this 31st

day of May, 192 6

*J. W. Riccio*

Register.

RECORDED

WILLIAM PIERCE,  
Complainant

-vs-

CLARA LEE PIERCE,  
Respondent.

) IN THE CIRCUIT COURT,  
(

) BALDWIN COUNTY, ALABAMA.  
(

) IN CHANCERY.  
)

Comes the Respondent, Clara Lee Pierce, and for answer to the Complainant's bill of complaint and to each count thereof, separately and severally, says that the facts alleged therein are untrue and demands strict proof thereof.

*Clara Lee Pierce* Clara Lee Pierce.

WITNESSES:

William Pierce

vs.

Clara Lee Pierce,

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,  
answer of Deft and testimony of William Pierce and Jesse Pierce,

and in behalf of Defendant upon

*J. W. Pearson*

Register

No. 587.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

William Pierce

vs.

Clara Lee Pierce.

NOTE OF TESTIMONY.

Filed in Open Court this 7<sup>th</sup>

day of June, 196

*T. W. Pinner*

Register

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8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 587.

June 7th, 1926.

~~Richardson~~

William Pierce

, Complainant.

vs.

Clara Lee Pierce,

, 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 Rickarby, 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.

Rickarby, Beebe & Hall.

Solicitor for Complainant.

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

William Pierce

vs.

Clara Lee Pierce.

REQUEST FOR DECREE IN  
VACATION

FILED June 7th, 1926

*T. W. Pickens*  
Register

RECORDED

RECORDED IN \_\_\_\_\_ RECORD

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Register

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TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT

COURT OF BALDWIN COUNTY, ALABAMA. IN CHANCERY.

Comes the Complainant, William Pierce, and humbly complaining represents unto your Honor as follows:

FIRST: That he is a resident of Baldwin County, Alabama, and over the age of twenty-one years; that he has been a resident of Baldwin County, Alabama, for more than three years next preceding the filing of this bill; that the Respondent, Clara Lee Pierce, is over the age of twenty-one years and a non-resident of the State of Alabama; that her Post Office address is 6505 Holmes Avenue, Los Angeles, California.

SECOND: That the Complainant, William Pierce, and the Respondent, Clara Lee Pierce, are husband and wife, having intermarried at Pascagoula, Mississippi, on May 11, 1919 and that they lived together as man and wife until on or about June 22, 1923.

THIRD: That on or about June 22, 1923, the Respondent, Clara Lee Pierce, voluntarily and without cause on the part of the Complainant went away and left the bed and board of your Complainant, William Pierce, and that since that time she has remained away voluntarily and continuously.

PRAYER FOR PROCESS.

Complainant, William Pierce, prays that your Honor will make such orders and issue such decrees as will make the said Clara Lee Pierce party respondent to this bill of complaint and require her to plead, answer or demur to this bill of complaint within the required time and under the penalties of this court.



PRAYER FOR RELIEF.

Complainant prays that upon a final hearing of this cause that your Honor will grant unto him a divorce from the bonds of matrimony from the said Clara Lee Pierce and that your Honor will permit your Complainant to marry again and that your Honor will grant unto the Complainant such other, further or different relief as to your Honor may seem fit and proper and as in duty bound complainant will ever pray, etc.

Richard Beebe Hall  
Solicitors for Complainant.

Respondent is required to answer each and every allegation of the foregoing bill of complaint numbered first to third, inclusive, but not under oath. Oath is hereby expressly waived.

Richard Beebe Hall  
Solicitors for Complainant.

State of Alabama )  
Baldwin County )

Before me, H. M. Hall, a Notary Public in and for said State and County, personally appeared William Pierce the complainant in the above cause and who having been by me first duly sworn deposes and says that he has read the foregoing bill of complaint in the matter of William Pierce vs. Clara Lee Pierce, and that the facts alleged therein are true and correct to the best of his information, knowledge and belief.

William Pierce

Sworn to and subscribed before me on this the 15th day of May, 1926.

H. M. Hall  
Notary Public.

Original Bill

Filed May 15/1926.  
T. W. Rickman  
Register

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