

STATE OF ALABAMA,
BALDWIN COUNTY.

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

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

Your Oratrix, Fannie Curtis, respectfully represents
and shows unto Your Honor as follows:-

FIRST:

That she is a bona fide resident citizen of Baldwin
County, Alabama, residing at Bromley, and has resided in Baldwin County,
Alabama, for more than three years next preceeding the filing of this
bill; that she is over the age of twenty one years.

SECOND:

That Elijah Curtis is a resident citizen of Baldwin
County, Alabama, residing at Bromly, Alabama; that he has resided in
Baldwin County, Alabama, for more than three years next preceeding
the filing of this bill; that he is over the age of twenty one years.

THIRD:

That Your Oratrix and the said Elijah Curtis were
lawfully married on the 28th., day of July, 1918, and lived together as
husband and wife until to-wit:- November, 1923, at which time the said
Elijah Curtis voluntarily abandoned the said Oratrix, without just cause
and without fault on her part. Said act was committed in Baldwin County,
Alabama.

THE PREMISES CONSIDERED Your Oratrix respectfully
prays that the said Elijah Curtis be made party respondent to this bill of
complaint by the usual process of this Honorable Court; that such orders,
decrees and publications be made as necessary to perfect service on the

said Elijah Curtis and that he be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your Honor will grant unto Your Orator an absolute divorce from the said Elijah Curtis.

That if Your Oratrix is mistaken in the relief prayed for then Your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.,

HENRY D. MOORER,
Attorney for Complainant.

FOOTNOTE:

Defendant is required to answer every allegation contained in the foregoing bill, paragraph one to three, inclusive, but not under oath. Answer under oath is hereby expressly waived.

HENRY D. MOORER,
Attorney for Complainant.

The State of Alabama,
Baldwin County.

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

Fannie Curtis

Complainant.

VS.

Elijah Curtis

Respondent.

I *T. W. Richardson*

as Register and Commissioner

have called and caused to come before me *Fannie Curtis and*

Florence Curtis.

witness named in the Requirement for Oral Examination, on the *23* day of *July*
1927, at the office of *Register Bay Minette*

in *Bay Minette*, Alabama, and having first sworn said witness to speak the
truth, the whole truth, and nothing but the truth, the said *T. W. Richardson*

doth depose and say as follows:

TESTIMONY OF FANNIE CURTIS.

My name is Fannie Curtis. I am a bona fide resident
citizen of Baldwin County, Alabama, residing at Bromley, and have resided
there for more than three years next preceeding the filing of this bill
for divorce. I was over the age of twenty one years at the time of
filing this bill. Elijah Curtis is a resident of Baldwin County residing at
Bromley, Alabama and has resided there for more than three years next preceed-
ing this filing of this bill and is over the age of 21 years.

Elijah Curtis and myself were married on the 28th., day of
July, 1918, and lived together ~~with~~ until November, 1923, at which time the said
Elijah Curtis voluntarily abandoned me without just cause and without any fault
on my part. We were living in Baldwin County in November, 1923, at the time
Elijah Curtis abandoned me.

Fannie Curtis

Subscribed and sworn to before me this
23 day of *July*, 1927.

T. W. Richardson
Clerk Circuit Court

ORAL EXAMINATION.

I, J. W. Rice, 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 et and read over to them and they signed the same in the presence of myself And Hon. H. D. Moore at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness... or had proof made before me of the identity of said witness...; 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 23rd day of July 1927

J. W. Rice (L. S.)

NO. 625 - PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

James Lewis

vs. Complainant

Beigab Lentie

Respondent.

Oral Deposition

Filed July 28, 1927

J. W. Rice, Register.

Recorded in

Record

Vol. Page

Register

TESTIMONY OF FLORENCE CURTIS.

My name is Florence Curtis. I have known Elijah Curtis and Fannie Curtis for the last three years and know of my own knowledge that they have not lived together within the last three years preceeding this date. I know of my own knowledge that Elijah Curtis abandoned Fannie Curtis of his own accord and without any cause on the part of Fannie Curtis, his wife,

F. Florence Curtis

Subscribed and sworn to before me
this 23rd day of July, 1927.

J. W. Reardon
Dist. Circuit Court

The State of Alabama, }
Baldwin County.

No. 625. CIRCUIT COURT, IN EQUITY

Fannie Curtis Complainant

vs.

Elijah Curtis, 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,

It is further ordered, that the said Fannie Curtis, 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 Fannie Curtis, 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 Elijah Curtis

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

This 25th day of July 1927.
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.

22

No. 625

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Fannie Curtis

vs.

Elijah Curtis.

DECREE OF DIVORCE.

Filed in office this *26th*

day of *July*, 192*7*

T. W. Peirson
Register.

E. O. M.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 625 Vacation Term, 1917

Fannie Curtis Complainant

vs.

Elijah Curtis, 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 H.D. Moorner,

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.

H.D. Moorner,
Solicitor for Complainant.

4

No. 625.

Page

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

Fannie Curtis

vs.

Elijah Curtis.

REQUEST FOR DECREE IN
VACATION.

Filed July 23rd 191²⁷

J. W. McLeary
Register

RECORDED

Recorded in Record

Vol. Page

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

Elijah Curtis,,

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

Fannie Curtis,

against said

Elijah Curtis

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 25th day of

Sept 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

Fannie Curtis

vs.

Elijah Curtis,

RECORDED

Henry D. Moorer.

Solicitor for Complainant

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.

I hereby accept service of the
within summons and waive service
of same by the Sheriff.

Dated this 16th., day of
October, 1926.

his
Elijah Curtis
Mark.

ATTEST:

Gladys Bush
Leola Cain

Recorded in Vol. Page

FANNIE CURTIS,
Complainant,

-vs-

ELIJAH CURTIS,
Defendant,

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

C-112
Comes Elijah Curtis, defendant, in the above styled cause and for answer to same denies each and every allegation contained therein and demands strict proof of same. She waives service of subpoena by the Sheriff on said bill, notice of the filing of interrogatories, or any proceedings to take testimony on oral or written examination as well as the right to cross examine, and consents that this cause be submitted for decrees on note of testimony made by the Register either in term time or vacation.

Dated this 16th day of October, 1926.

his
Elijah Curtis
mark

ATTEST:

Gladys Bush
Leola Cain

No. 625.

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Fannie Curtis

vs

Elijah Curtis.

NOTE OF TESTIMONY

Filed in Open Court this 23rd
day of July 1927.

D. W. Robinson
Register

FILED IN THE COURT OF BALDWIN COUNTY ALABAMA

Fried & Co. 18th/725
J. M. Robinson
Register

REGISTER
BALDWIN COUNTY
ALABAMA

.....Fannie Curtis.....

.....

.....

vs.

Elijah Curtis

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.....

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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 Defendant and testimony of Fannie Curtis and

Florence Curtis.

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and in behalf of Defendant upon-----

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D. W. Bellinson

Register.