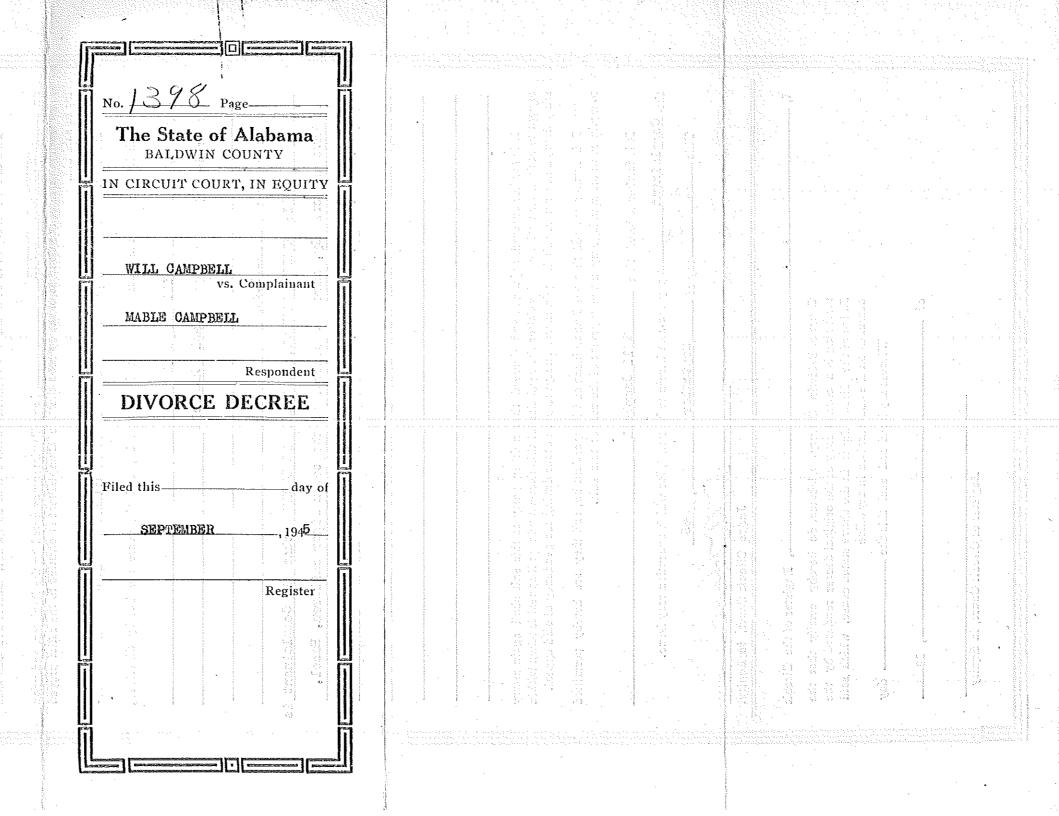
### THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

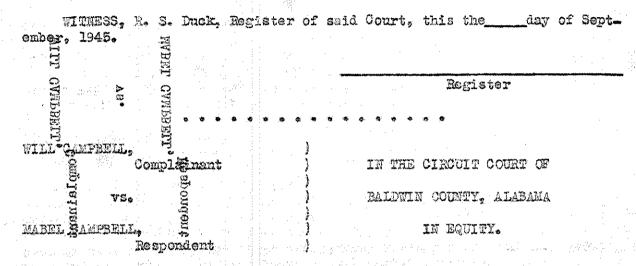
This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confess  MANNER AND WAIVER  and Testimony as noted by the Register, and upon side bill.  It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony here offere existing between the Complainant and Defendant be, and the same are hereby, dissolved and that the said   Will Campbell  storever divorced from the said   Kable Campbell  or and on account of   Adultery  It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the readition of this decree, and that if appeal is taken with ixity days, neither party shall again marry except to each other until sixty days after the readition of this decree, and that if appeal is taken with ixity days, neither party shall again marry except to each other until sixty days after the readition of this decree, and that if appeal is taken with ixity days, neither party shall again marry except to each other during the pendency of said appeal.  It is further ordered that the Complainant and Respondent be, and they are hereby permitted again contract marriage upon the payment of the cost of this suit.  It is further ordered that   Will Campbell  Day the complainant pay the cost herein to be taxed, for which execution may issue.  This   Complainant pay the cost herein to be taxed, for which execution may issue.  This   Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is only and and seal this the day of   Witness my hand and seal this the day		WILL CAMPEELL			Complainant
This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confess on ANSWER AND WAIVER and Testimony as noted by the Register, and uponsideration thereof, the Court is of the opinion that the Complainant is entitled to the relief praye or in said bill.  It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony here offer existing between the Complainant and Defendant be, and the same are hereby, dissolved and that the said Wall Campbell  It is further ordered, adjudged and decreed that neither party to this suit shall again marr to have the custody, care and control of the seven minor children, Hazel,  Robert, Opal, Ioma, Erma Jean, Wade and Joan,  It is further ordered, adjudged and decreed that neither party to this suit shall again marr except to each other until sixty days after the rendition of this decree, and that if appeal is taken within the sagain contract marriage upon the payment of the cost of this suit.  It is further ordered that the Complainant and Respondent be, and they are hereby permitted again contract marriage upon the payment of the cost of this suit.  It is further ordered that Will Campbell  This Ary Again and Respondent be, and they are hereby permitted by the cost herein to be taxed, for which execution may issue.  September 19 45  Judge Circuit Court, in Equity  Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office  Witness my hand and seal this the day	.*		vs.	• ]	) 1 \ 3
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THE STATE OF ALABAMA. BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

WE COMMAND YOU, that you summon Mabel Campbell, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within thirty days after the service of the summons, and there to answer, plead or demar without oath to a bill of complaint, lately exhibited by Will Campbell, against the said Mabel Campbell, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty of the law. And we further command that you return this writ with your execution thereof.



TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY. ALABAMA, IN EQUITY.

Your Complainant, Will Campbell, a resident citizen of Baldwin County, Alabama, over the age of twenty-one years, respectfully shows unto your Honor that on or about March 29, 1934, Complainant intermarried with said Mabel Campbell at Foley. Alabama, and they lived together as man and wife until several months ago, most of the time residing in Baldwin County, Alabama, and the Complainant has been a bona fide resident citizen of Alabama for one year next preceding the filing of this bill.

- 2. Early in the month of June, 1945, the Respondent committed adultary with one Floyd Smith, which adultery the Complainant has not condoned.
- 3. That there was bern to said marriage seven children, Hazel, aged 9 years, Robert, aged 7 years, Opal, aged 6 years, Ioma, aged 4 years, Erma Jean, aged 3 years, Wade, aged 2 years, and Joan, aged 6 months, (the two youngest of which have been adopted by Mr. and Mrs. Munter of Pensacola, Florida, with the consent and approval of the Honorable W. R. Stuart, Judge of Probate and the Welfare Department of Baldwin County, Alabama).

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Mabel Campbell party Respondent to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Courts

Complainant further prays that upon a final hearing hereof your Honor will grant unto him an absolute decree of divorce forever barring the bonds of matrimony existing between him and the Respondent; that he be awarded the custody of the said children, Hazel, Robert, Opal, Ioma, Erma Jean, Wade and Joan; that your Honor will give and grant unto him such other, further, different or general relief as he may be entitled to receive, and as in duty bound he will ever pray.

Forest A. Ozristian, Foley, Alabama

Solicitor for Complainant

#### BILL OF COMPLAINT

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ALLEASING.

WILL CAMPBELL. TOOTS OF 200 COMMON CO. 

Vs.

MABEL CAMPBELL,

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Complainant

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### THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

· · · · · · · · · · · · · · · · · · ·	WILL CAMPBELL	Complainant
	VS.	·
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	MARKO CAMPBELL	Respondent
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as Registerszent C	ommissioner	
have called and ca	used to come before me	and W. R. Margason
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in <b>Foley</b> truth, the whole tr	ffice of Forest A. Christian, Attorn , Alabama, and having first swo	orn said Witness <u>es</u> to speak the
The state of the s	son doth depose and say as follow	
above style	e is Will Campbell, I am 44 years of d case. Last Spring during potato s to season and kept stepping out with	clage and the Complainant in the season, my wife left me in May Ployd Smith. I told her to come

Will Campbell

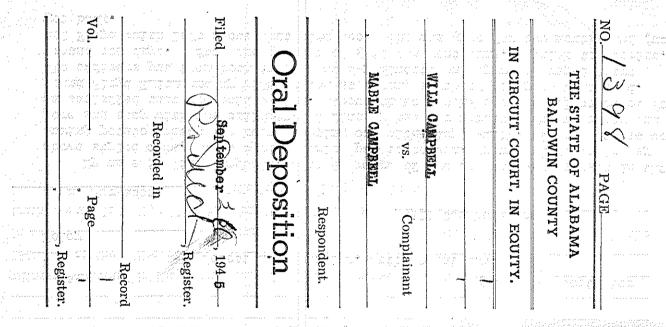
My name is W. R. Margason. I am the night policeman at Foley, Alabama. Last June a deputy sheriff from Bay Minette, came to Foley one evening and wanted to know if I knew where Floyd Smith was, because he had a warrant for his arrest for non-support of Smith's family. Three of us officers found his arrest for non-support of Smith's family. Three of us officers found Floyd Smith and Mabay Campbell in bed together at Green's Camp, on the Gulf Highway, South of Foley. We were informed at that time that they had spent many nights there together. The deputy sheriff took both of them to Bay Winette and I believe that they pleaded guilty to a charge of adultery and paid a fine. A short time after they got out of jail they both left and apparently went to the State of Florida; they both came back two or three days ago and Floyd Smith was immediately arrested for non-support of his family.

W. R. Margason

I, Alica A. Christian as Explosive Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down by me in writing in the words of the witness of the presence of the witness of the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proom made before me of the identity of said witness in the result thereof 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 in the contraction of the parties to said the country 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 in the presence of the presence of the witness of the wit



THE STATE OF ALABAMA, )
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon Mabel Campbell, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within thirty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by Will Campbell, against the said Mabel Campbell, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty of the law. And we further command that you return this writ with your execution thereof.

WITNESS, R. S. Duck, Register of said Court, this the \_\_\_day of September, 1945.

WILL CAMPBELL,

Complainant

Vs.

BALDWIN COUNTY, ALABAMA

MAREL CAMPBELL,

Respondent

Register

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

Your Complainant, Will Campbell, a resident citizen of Baldwin County, Alabama, over the age of twenty-one years, respectfully shows unto your Honor that on or about March 29, 1934, Complainant intermarried with said Mabel Campbell at Foley, Alabama, and they lived together as man and wife until several months ago, most of the time residing in Baldwin County, Alabama, and the Complainant has been a bona fide resident citizen of Alabama for one year next preceding the filing of this bill.

- 2. Early in the month of June, 1945, the Respondent committed adultery with one Floyd Smith, which adultery the Complainant has not condoned.
- 3. That there was born to said marriage seven children, Hazel, aged 9 years, Robert, aged 7 years, Opal, aged 6 years, Ioma, aged 4 years, Erma Jean, aged 5 years, Wade, aged 2 years, and Joan, aged 6 months, (the two youngest of which have been adopted by Mr. and Mrs. Hunter of Pensacola, Florida, with the consent and approval of the Honorable W. R. Stuart, Judge of Probate and the Welfare Department of Baldwin County, Alabama).

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Mabel Campbell party Respondent to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court;

Complainant further prays that upon a final hearing hereof your Honor will grant unto him an absolute decree of divorce forever barring the bonds of matrimony existing between him and the Respondent; that he be swarded the custody of the said children, Hazel, Robert, Opal, Ioma, Erma Jean, Wade and Joan; that your Honor will give and grant unto him such other, further, different or general relief as he may be entitled to receive, and as in duty bound he will ever pray.

Complainant

Forest A. Christian, Foley, Alabama

Solicitor for Complainant

WILL CAMPBELL,

Complainant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

MABER CAMPBELL,

IN EQUITY.

#### ANSWER

Now comes Mabar Campbell, the Respondent named in the above entitled cause, and for answer to the Bill of Complaint filed against her herein says:

- 1. She admits that the Complainant is over twenty-one years of age and a bona fide resident citizen of Baldwin County, Alabama, and that she is over the age of twenty-one years and a resident of Baldwin County, Alabama.
- 2. The Respondent denies each and all of the other allegations of the Bill of Complaint and demands strict proof of same.
- 3. Respondent waives all formalities and requirements of law in connection with the taking of testimony in this cause, submission of the cause for final decree and any and all other notice or notices of every kind and nature which are or may be required in this cause.

mall Camp Leel
Respondent.

THE STATE OF ALABAMA,

BALDWIN COUNTY.

County and State, hereby certify that Mabay Campbell, whose name is signed to the foregoing answer and waiver, and who is known to me, acknowledged before me on this day that, being informed of the contents of the said answer and waiver, she executed the same voluntarily on the day the same bears date.

Given under my hand this the 24th day of September, 1945.

My commission expires:

Note my Public

Notary Public

1398

ANSWER

MABLE CAMPBELL,
Respondent

Register.

Forey Chr AIAn

ECORDED

No. 1398

## THE STATE OF ALABAMA Baldwin County

IN EQUITY

Circuit Court of Baldwin County

WILL CAMPBELL

VS.

MABLE CAMPBELL

#### NOTE OF TESTIMONY

Filed in Open Court this 26

day of September

\_\_ 19

Register.

Printed by The Baldwin Times, Bay Minette.

# THE STATE OF ALABAMA, Baldwin County

CIRCUIT COURT

Alica A. Christan		General States Control
KNOW YE: That we, having full faith in your prudence ar	nd competency have appo	inted vol Commis-
sioner, and by these presents do authorize you, at such time	et al. (1994)	* **
you and examine Will Campbell and W. R. Margason		
	And the second s	
as witnesses in behalf of	in a cause per	nding in our Circuit
Court of Baldwin County, of said State, wherein		
Will Campbell		
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		Defendant
on oath to be by you administered, upon <b>Will Campbell</b> ar	id W. B. Wargason	
to take and certify the deposition_s of the witness_es and r	eturn the same to our C	eurt, with all Con
venient speed, under your hand.		•
Witness day of September	9r , 19 <sup>45</sup>	
	ntrophore	- REGISTER
Commissioner's Fee \$	•	
Witness' Fees, \$		

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THE STATE OF ALABAMA, ) BALDWIN COUNTY.

KNOW ALL MEN BY THESE PHESENTS, that this agreement made and entered into by and between Will Campbell, party of the first part, and Mable Campbell, party of the second part, WITNESSETH:

WHEREAS, the parties hereto are husband and wife and have come to the conclusion that it is absolutely impossible for them to any longer live together; that whereas a swit is now pending in the Circuit Court of Baldwin County, Alabama, by the party of the first part as Complainant against the party of the second part as Respondent;

WHEREAS, the parties have reached a full and complete agreement as to support and custody of the children and payment of all costs.

1.

The party of the first part is to have the custody, care and control of the seven minor children, Hazel, Robert, Opal, Ioma, Erma Jean, Wade and Joan, w

IN WITNESS WHEREOF, the parties have hereto set their hands and seals this the 24 day of September, 1945.

Milli Campell (SEAL)

THE STATE OF ALABAMA, )

BAIDWEN COUNTY.

a Notary Public in and for said County and State, hereby certify that Will Campbell and Mable Campbell, whose names are signed to the foregoing agreement, and who are known to me, acknowledged before me on this day that, being informed of the contents of the said agreement, they executed the same voluntarily on the day the same bears date.

Given under my hand this the 24 day of September, 1945.

My commission expires: 3/25/49

AGREEMENT

Complainant

MABLE CAMPBELL.

Respondent