

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 755. Vacation Term, 1928

Lena Mae Howard, Complainant

vs.

Graham Howard, Defendant

To M. 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 W. H. Hawkins, Atty for Complainant

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.

W. H. Hawkins
W. H. Hawkins
Solicitor for Complainant.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Lema Mae Howard

vs.

Graham Howard

REQUEST FOR DECREE IN
VACATION

FILED July 25th 1928

J. M. Williams
Register

RECORDED

RECORDED IN RECORD

VOL. PAGE

Register

Lena Mae Howard.

vs.

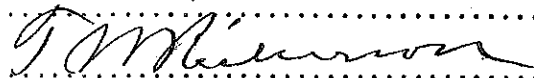
Graham Howard.

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 Lena Mae Howard and
documentary evidence from State of Texas.

and in behalf of Defendant upon



Register.

6

No. 755-----

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Lena Mae Howard

vs

Graham Howard.

RECORDED

NOTE OF TESTIMONY

Filed in Open Court this 25th-----

day of July----- 1928

J. W. Rice

Register

755

The State of Alabama, Baldwin County.

No. 755.

Circuit Court, in Equity.

Lena Mae Howard

Complainant

vs.

Graham Howard

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.

Bigamy on the part of ~~Lena Mae Howard~~ Graham Howard,

[Dotted lines for additional text]

It further orderd, that the said Lena Mae Howard be, and she is hererby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Lena Mae Howard 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 Graham Howard

It is further ordered, adjudged and decreed that said Lena Mae Howard shall not again marry except to said Graham Howard until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Graham Howard

during the said pendency of appeal

This 31st day of July 1928.

[Signature of John D. Ligth]

Judge of the Circuit Court of Baldwin County.

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 1928, 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 1928

Register

755

NO. 755

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Lena Mae Howard

vs.

Graham Howard

DECREE OF DIVORCE.

Filed in office this 2nd

day of August, 1928

T. W. Nicolson

Register.

RECORDED

E. O. M.

PUBLISHED EVERY THURSDAY

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

R. B. VAIL
EDITOR AND PROPRIETOR

BAY MINETTE, ALA.

ALFIDAVIT 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 _____

Notice = Non-residents

Howard vs. Howard

Was published in said Newspaper for 4 consecutive weeks in the following
issues:

Date of first publication	<u>May 17</u>	-	<u>1928</u>	Vol. <u>39</u>	No. <u>16</u>
Date of second publication	<u>" 24</u>	-	<u>"</u>	Vol. <u>39</u>	No. <u>17</u>
Date of third publication	<u>" 31</u>	-	<u>"</u>	Vol. <u>39</u>	No. <u>18</u>
Date of fourth publication	<u>June 7</u>	-	<u>"</u>	Vol. <u>39</u>	No. <u>19</u>

Subscribed and sworn to before the undersigned this 17 day of _____

January 1929
J. W. McIlwain
Deputy Circuit Court

R. B. Vail
Publisher.

BAY MINETTE, ALA. June 1 - 19 28

M J. W. Richardson

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

Now Rec Notice - Howard vs. Howard 172 mts 4 1/2
Hawkins & Crovatt Attys - Rem of 17-24-31-6/7 # 774

THREE

NOTICE TO NON-RESIDENT

The State of Alabama, Baldwin County.

Circuit Court, in Equity.

This the 16th day of May, 1928.

Lena Mae Howard vs. Graham Howard

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. H. Hawkins, Atty for Complainant, that the Defendant Graham Howard, is a non-resident of the State of Alabama and resides in the State of Texas, 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 published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Graham Howard, to answer or demur to the Bill of Complaint in this cause by the 17th day of June.


A. H. Crovatt and W. H. Hawkins,
Attys. for Complainant. 16-58

755

Howard
vs
Howard

Howard
vs
Howard

Filed Jan 17/1929
T. K. Sullivan
Registrar



MRS. CROSBY ENTERTAINS FOR MISS LUCILE ARMSTRONG.
Mrs. J. D. Crosby entertained for Miss Lucile Armstrong a lovely Vanity shower on Friday, June 1st, from four to six. As the guests entered they were served punch by two of the younger girls, Isabel McLeod and Mary Lucile Arant, who wore pretty pink paper dresses. Then each guest was asked to write a beauty hint for the bride-to-be in an attractive little booklet entitled, "Beauty Hints." Having accomplished this, they were free to admire the beauty-to-be was a trifling effort, and dining the others, and decorated also in pink and white with a lovely white wedding bell hanging over it. To complete the picture, but as a coincidence in fact the bride-to-be was faintly outlined.

Decree pro confesso by Publication.

The State of Alabama,
Baldwin County.

Circuit Court in Equity

No 755. Vacation Term 1928.

Lena Mae Howard, Complainant.
vs.
Graham Howard, Defendant.

In this cause it appears to the Register, that the order of publication heretofore made in this cause, was published in Bay Minette, Baldwin County, Alabama, in the Baldwin Times for four consecutive weeks and that a copy was posted at the Court House door in Baldwin County, Alabama on the 17th day of May, 1928,

And it now appearing to the Register that the said Graham Howard 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 is hereby is in all things taken as confessed against the said Graham Howard.

This the 25th day of July, 1928.

D. M. [Signature] Register

RECORDED

Mr. [Signature]

Register.

Filed July 25th, 1928.

Publication.

Decree pro confesso on

Graham Howard.

vs.

Lena Mae Howard

Handwritten vertical text

4

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

Irene Mae Howard

vs.

Graham Howard,

The State of Alabama,

Baldwin

County.

Circuit Court, in Equity.

This the 16th day of

May, 1928

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

W. H. Hawkins, Atty for Complainant,

that the Defendant

Graham Howard,

is a non-resident of the State of Alabama an resides in the State of Texas,

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 Graham Howard,

to answer or demur to the Bill of Complaint in this cause by the

17th

day of June 1928, or after thirty days therefrom a decree Pro Confesso may be

taken against Graham Howard,

J. W. Richerson,

O. H. Provatt and

W. H. Hawkins.

Register.

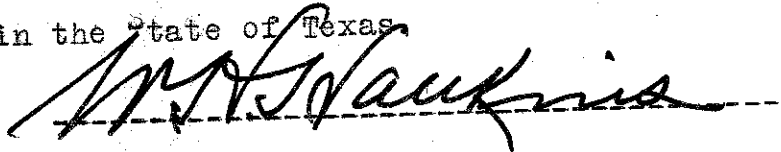
Lena Mae Howard, Complainant

vs.

Circuit Court of Baldwin Co. Ala.

Graham Howard, Defendant

Personally appeared before me, T. W. Richerson, Register of Circuit Court, Baldwin County, Alabama, W. H. Hawkins, who on oath states that he is one of the solicitors for complainant in the above entitled cause, and he states, on information and belief that Graham Howard, the defendant is over the age of 21 years and is a non-resident of the State of Alabama, residing in the State of Texas.



Sworn to and subscribed before me on the 16th. day of May 1928.



Register.

2

Filed May 16/925
J. P. Williams
Register

RECORDED

Lena Mae Howard, Complainant.

vs.

Circuit Court of Baldwin County, Ala.

Graham Howard, Defendant.

In Equity.

To the Honorable John D. Leigh, Judge of said Court:

First.

Complainant represents that she is a bona fide resident of Baldwin County, Alabama, and has been a bona fide resident of the State of Alabama for more than three years next preceding the filing of the bill of complaint in this cause, and that she is over the age of 21 years, and that the defendant, Graham Howard, is over the age of 21 years and is now incarcerated in the penitentiary of Texas at Austin Texas, having plead guilty to an indictment charging bigamy, on the 20th. day of February ¹⁹²⁸ and sentenced to the penitentiary for a term of three years .

Second.

That on to-wit:- November 5, 1926, complainant was married ^{to} defendant in Butler County, Alabama.

Third.

That on or about October 21, 1927, the defendant, Graham Howard committed adultery with one Beulah Moody, having married the said Beulah Moody and lived with her for some months as man and wife, until he was arrested, indicted, tried, convicted and sentenced to the penitentiary for bigamy.

And complaint avers that she has not in any way condoned this adultery on the part of her husband, nor since she learned of said adultery, has she admitted the offending party to conjugal embraces; neither was any act or acts of adultery on the part of defendant done with the consent or approval of complainant.

Premises considered, complainant prays that the said Graham Howard be made a party defendant to this cause, and that service of process may be had on him, and that he may be required to appear, plead, answer or demur withing the time required by law; and that upon a final hearing your honor will grant your complainant an absolute divorce from the said Graham Howard, and that such other and different relief may be granted to complainant as your honor may deem proper.

W. H. ...

Solicitors for Complainant.

Foot note.

Defendant is required to answer each and every paragraph of this complaint but not under oath, oath to same being hereby waived.

W. H. Waukris

A. N. Crowlath

Solicitors for Complainant.

Lena ^{1st} Mae Howard
Comptt

Graham Howard
defendant

Bill of Complaint

Filed May 16/1928
M. W. Rice
Register

RECORDED

W. H. Mackin &
A. W. Crowlth
Sols. for Comptt

The State of Alabama, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 755. Vacation Term, 1928

Lena Mae Howard Complainants

vs.

Graham Howard Defendants

Motion is hereby made for a Decree Pro Confesso against
Graham Howard 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 21 day of July 1928
W. H. Hawkins
Solicitor.

3

No. 755. Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Lena Mae Howard

Complainants.

Vs.

Graham Howard

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed July 21st 1928

[Signature]
Register.

Recorded in Record,

Vol. RECORDED

Register.

Baldwin Times Print, Bay Minette.

In the Name and by the Authority of the State of Texas:

THE GRAND JURORS, duly selected, organized, sworn and impaneled as such for the County of Knox

, State of Texas, at the February

term, 19 28 of the District Court for said County, upon their oaths present in and to said Court that on or about the 21st day of October A. D. 19 27 and anterior to the presentment of this Indictment, in the County and State aforesaid

Graham Howard

did, then and there unlawfully ~~did marry Beulah Moody and at the time of said marriage the said Graham Howard had a former wife then living, who was Lena May Howard, to whom he had theretofore been and then as there was legally married~~

against the peace and dignity of the State.

L. H. BECK

Foreman of the Grand Jury.

THE STATE OF TEXAS

County of KNOX

I, J. C. PATTERSON, Clerk

of the KNOX District Court of KNOX County, Texas, do hereby certify that the within and foregoing

is a true and correct copy of the original Bill of Indictment, filed in said Court on the 15th day of

February A. D. 1928, in Cause No. 1980, styled The State of Texas

vs. Graham Howard

Given under my hand and the seal of said Court, at office in Benjamin, Texas, this

15th day of February A. D. 1928

J. C. Patterson Clerk.
By _____ Deputy.

NAMES OF WITNESSES:

Empty lines for witness names.

--- COPY ---

No. 1980

THE STATE OF TEXAS

vs.

Graham Howard

INDICTMENT

OFFENSE

Bigamy (felony)

Attorney.

A TRUE BILL

L. H. BECK

Foreman of Grand Jury.

Presented in open Court by the Grand Jury, a quorum thereof being present, and filed the 15 day of February 1928

J. C. PATTERSON

Clerk District Court.

By _____ Deputy.

Amount of Bail, \$ _____

THE STATE OF TEXAS | IN DISTRICT COURT OF
NO. 1980 VS | KNOX COUNTY TEXAS.
Graham Howard | FEBRUARY TERM A.D. 1928.

FEBRUARY 20th, 1928.

THIS DAY this cause being again called, the state appeared by her District Attorney, and the defendant Graham Howard was brought into open court in person, in charge of the Sheriff, for the purpose of having the sentence of law pronounced in accordance with the verdict and judgment herein rendered and entered against him on a former day of this term. AND thereupon the defendant Graham Howard was asked by the court whether he had anything to say why said sentence should not be pronounced against him, and he answered, nothing in bar thereof, and asked the court to pronounce sentence upon him at once; WHEREUPON the court proceeded, in the presence of the said defendant Graham Howard to pronounce sentence against him as follows: IT IS THE ORDER OF THE COURT that the defendant, Graham Howard who has been adjudged to be guilty of -----BIGAMY----- and whose punishment has been assessed by the verdict of the jury at confinement in the penitentiary for THREE years, be delivered by the Sheriff of Knox County, Texas, immediately, to the superintendent of the penitentiaries of the State of Texas, or other person legally authorized to receive such convicts, and the said GRAHAM HOWARD shall be confined in said penitentiaries for NOT LESS THAN TWO NOR MORE THAN THREE years, in accordance with the provisions of the law governing the penitentiaries of said state. AND the said GRAHAM HOWARD is remanded to jail until said Sheriff can obey the directions of this sentence.

RECORDED: VOL. 7 page 271 MINUTES OF THE DISTRICT COURT OF KNOX COUNTY TEXAS.

THE STATE OF TEXAS |
COUNTY OF KNOX | I, J.C. Patterson, District Clerk, in and for said County and State, do hereby certify that the above and foregoing is a true and correct copy of the sentence in the above entitled and numbered case, as the same appears of record in Volume 7 page 271 minutes of the District Court of said County.

Given under my hand and seal of said court, this the 3rd day of July A.D. 1928

J.C. Patterson
District Clerk, Knox County, Texas.

THE STATE OF TEXAS (IN DISTRICT COURT OF
No.1980-VS-) KNOX COUNTY TEXAS.
GRAHAM HOWARD (FEBRUARY TERM A.D.1928.
FEBRUARY 20th,1928.

THIS DAY this cause was called for trial, and the State appeared by her District Attorney, and the defendant Graham Howard, appeared in person in open Court, and both parties announced ready for trial, and said defendant Graham Howard, in open Court in person having been duly arraigned, pleaded guilty to the charge contained in the indictment; thereupon the said defendant was admonished by the Court as to the consequences of said plea, and the said defendant persisted in pleading guilty; and it plainly appearing to the Court that the defendant is sane, and that he is uninfluenced in making said plea by any consideration of fear, or by any ~~delusory or~~ persuasion or delusive hope of pardon prompting him to confess his guilt, the said plea of guilty is by the court received, and here now entered of record upon the minutes of the Court as the plea herein of said defendant; thereupon a jury, to-wit: SUNSET BOONE, and eleven others, was duly selected, impaneled and sworn, who, having heard the indictment read, and the defendant plea of guilty thereto, and having heard the evidence submitted, and having been duly charged by the Court, retired in charge of the proper officer to consider of their verdict, and afterwards were brought into open court in charge of the proper officer, the defendant being present, and in due form of law returned into open court the following verdict, which was received by the court, and is here now entered upon the minutes of the court, to-wit: "WE, the jury find the defendant guilty, and assess his punishment at three years in the penitentiary

SUNSET BOONE
FOREMAN OF THE JURY"

IT IS THEREFORE CONSIDERED, ordered and adjudged by the court that the defendant GRAHAM HOWARD is guilty of the offense of BIGAMY as confessed by him in his said plea of guilty herein made, and that he be punished as has been determined by the jury, by confinement in the penitentiary for ~~three years~~ NOT LESS THAN TWO NOR MORE THAN THREE YEARS, and that the STATE OF TEXAS do have and recover of the said defendant all costs in this prosecution expended, for which let execution issue; and that the said defendant be remanded to jail to await the further order of the court herein.

x x x x x x x x x x

THE STATE OF TEXAS (COURT OF KNOX) I, J.C. Patterson, District Clerk, in and for said county and State, do hereby certify that the above and foregoing is a true and correct copy of the VERDICT AND JUDGMENT in the above entitled and numbered cause, as the same appears of record in the minutes of the District Court of Knox County, Texas, at page 271 Volume 7, minutes of the District Court of said County.

GIVEN UNDER MY HAND AND SEAL OF SAID COURT This the 3rd day of July A.D.1928.

J.C. Patterson
District Clerk, in and for Knox County, Texas.

CERTIFICATE OF AUTHENTICATION.

The State of Texas, County of Knox, I, J.C. Patterson, as Clerk of the District Court of Knox County, Texas, do hereby certify that the foregoing three pages contain a true and correct and full and complete transcript of the INDICTMENT, VERDICT & JUDGMENT, AND SENTENCE, as the same appears on file and of record in the case of THE STATE OF TEXAS vs. GRAHAM HOWARD, numbered 1980 on the docket of said

IN TESTIMONY WHEREOF, I, as such Clerk, do hereunto subscribe my name, and affix the seal of said Court, at the City of Benjamin, in said Knox County, in the State of Texas, this the 3rd day of July, A.D. 1928.

J.C. Patterson
Clerk.

THE STATE OF TEXAS, COUNTY OF BAYLOR, I, Isaac O. Newton, the sole judge of the District Court, of Knox County, Texas, within and for the 50th Judicial District of Texas, do hereby certify that J.C. Patterson, whose name is subscribed to the foregoing attestation, was at the time of making said certificate of authentication, and is now, the duly elected, commissioned, qualified and acting clerk of said Court; that as such Clerk he is, under the laws of the State of Texas, the legal custodian of the records of said Court; and the officer authorized by the laws of the said State to make the said certificates, attestations, acts and doings are entitled to full faith and credit; and that his foregoing attestation of the transcript of the files and records of said Court rendered and entered of record in the criminal action then pending in said court, wherein THE STATE OF TEXAS, plaintiff and GRAHAM HOWARD was defendant is in due form.

IN TESTIMONY WHEREOF, I do hereunto subscribe my name as the Judge of said Court, at the City of Seymour, in the State of Texas, this the 5th day of July, A.D. 1928.

Isaac O. Newton

Judge of the District Court of Knox County, within and for the 50th Judicial District of Texas.

THE STATE OF TEXAS, COUNTY OF KNOX, I, J.C. Patterson, as Clerk of the District Court, of Knox County, in the State of Texas, do hereby certify that Isaac O. Newton, whose name is subscribed to the foregoing certificate is the sole judge of the said Court; and he was such when said certificate was made; and that the signature thereto is his genuine signature.

IN TESTIMONY WHEREOF, I hereunto subscribe my name as such Clerk, and affix the seal of said Court at the City of Benjamin, in the State of Texas, this the 6 day of July, A.D. 1928.

J.C. Patterson
Clerk.

Shewell & Co. 25th St
St. Louis, Mo.
Received



BAY MINETTE, ALA.

M W Hawkins

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

To Pub. Non Res. Notice 4-T. #8/43
Howard vs. Howard

PUBLISHED EVERY THURSDAY

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

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 16th day of May, 1928.
Lena Mae Howard vs. Graham Howard.

In this cause it being made to appear to the Clerk of this Court by the affidavit of W. H. Hawkins, Atty. for Complainant, that the Defendant Graham Howard, is a non-resident of the State of Alabama and resides in the State of Texas, 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, published in Bay Minette, Alabama, that the notice hereto attached of _____

Notice to non-Residence

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

R. B. Vail, being duly sworn, deposes and says that he is PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of _____

Notice to non-Residence

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	<u>May 17</u>	Vol.	<u>39</u>	No.	<u>16</u>
Date of second publication	<u>" 24</u>	Vol.	<u>39</u>	No.	<u>17</u>
Date of third publication	<u>" 31</u>	Vol.	<u>39</u>	No.	<u>18</u>
Date of fourth publication	<u>June 7</u>	Vol.	<u>39</u>	No.	<u>19</u>

Subscribed and sworn to before the undersigned this July 23 day of July 1928

D. W. [Signature]
Jessie [Signature]

R. B. Vail
Publisher
W. H. [Signature]
Editor

The State of Alabama,
Baldwin County.

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

Lena Mae Howard Complainant.

VS.

Graham Howard Respondent.

I, ~~xxxx~~ T. W. Richarson

as Register and Commissioner

have called and caused to come before me

Lena Mae Howard

witness named in the Requirement for Oral Examination, on the 23 day of July

1928, 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 Lena Mae Howard

doth depose and say as follows:

My name is Lena Mae Howard, and I am the complainant in the above cause, and am over the age of 21 years.

I have been a bona fide resident of the State of Alabama for 25 years next before the filing of the bill of complaint in this cause. Graham Howard the defendant is over the age of 21 years and is now a resident of the State of Texas, and I am informed that he is incarcerated in the penitentiary of Texas under a sentence of three years for bigamy.

I was married to Graham Howard in Greenville, Alabama on the 20th day of November 1926, and he left me September 29, 1927.

without any cause or fault on my part, as I was always a dutiful and affectionate wife, and he had no cause for complaint.

That during the month of November 1927, I heard from the authorities in Texas that Graham Howard had been arrested charged with the offense of bigamy having married one Beulah Moody with whom he lived as his wife.

The Graham Howard named in these certificates from courts of the State of Texas is the same Graham Howard whom I married as previously stated.

I have never in any way condoned the the offense of Graham Howard,
him
nor have I admitted to conjugal embraces, since I learned of his
marriage and adultery with Beulah Moody, neither was any act of a-
dultery on the part of the said Graham Howard done with the consent
or approval of myself. *Lena Mae Howard*

Complainant offers in evidence certified copies of the indictment,
Plea of Guilty, Verdict of the jury, sentence of the Court and
certificate of authentication from District Court of Knox County,
Texas.

I, F. 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 and read over to her and she signed the same in the presence of

myself and Hon. W. H. Hawkins

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 23 day of July 1928

F. W. Richardson
(L. S.)

NO. 755. PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Lena Mae Howard

vs. Complainant

Graham Howard,

Respondent.

Oral Deposition

Filed July 23rd 8
192

F. W. Richardson, Register.

Recorded in

Record

Vol. Page

Register