

672

JESSE H. SMITH,
Complainant,

-vs-

ELLA A. SMITH,
Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA.
BALDWIN COUNTY.

In order to effect a settlement in the above cause as to counsel fees for respondent and alimony pendente lite and permanent it is agreed between the parties and their respective solicitors of record as follows: That there be paid to the solicitor of record for the respondent the sum of \$100.00 in full for counsel fees for respondent; that in full settlement for all alimony pendente lite and permanent there be decreed in favor of the respondent and as a part of the decree of divorce the sum of \$1500.00 to be paid by complainant to respondent in monthly installments of \$50.00 each month, first payment to be made thirty days after date of decree.

This settlement being intended to and upon the same being carried out shall be in full for all demands which respondent may now or hereafter have against complainant in connection with attorneys fees or alimony.

WITNESS THE HANDS of the parties hereto this 2nd. day of June, 1927.

Jesse H. Smith
Complainant.

Ella A. Smith
Respondent.

J. J. Jolley
Solicitor for Complainant.

Norman Stone
Solicitor for Respondent.

It is agreed that testimony may be taken and cause submitted by respondent and cross complainant without further notice

J. J. Jolley
Norman Stone

Filed June 2, 1927

T. W. Recum
Register

[Faint, illegible handwritten text, possibly bleed-through from the reverse side of the page]

JESSE H. SMITH,
Complainant,

-vs-

ELLA A. SMITH,
Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA.
BALDWIN COUNTY.

AMENDMENT BY RESPONDENT AND CROSS COMPLAINANT TO HER
ANSWER AND CROSS BILL AS FILED ON MAY 6th., 1927.

Comes Ella A. Smith, the respondent and cross complainant in this cause and by leave of the Court first had and obtained, amends her answer and cross bill by striking from the "Prayer for Process & Relief" the following viz:- ".....that upon a final hearing of this cause your Honor will render and grant unto your cross complainant ~~the~~ divorce mensa et thoro from the said cross respondent....." and inserting in lieu of the stricken portion the following:-

"That upon a final hearing of this cause your Honor will render and decree unto her an absolute divorce from the said cross respondent."

NORBORNE STONE
Solicitor for respondent and cross
respondent.

Filed June 2, 1927.

J. W. Nicolson
Register

JESSE H. SMITH,
Complainant,

-vs-

ELLA A. SMITH,
Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY.

ANSWER AND CROSS BILL:

Comes your respondent Ella A. Smith and files this her answer and cross bill in the above styled cause and shows unto your Honor and unto this court as follows:-

(1). Answering the first paragraph of the bill of complaint your respondent admits the allegations thereof.

(2). Answering the second paragraph of the bill of complaint your respondent admits the allegations thereof.

(3). Answering the third paragraph of the bill of complaint your respondent says that she and the complainant were married on the 15th. day of September, 1908 at Indianapolis in the State of Indiana and ever since have been and now are lawful husband and wife.

(4). Answering the fourth paragraph of bill of complaint your respondent denies each and every allegation thereof and demands strict proof of the same.

(5). Answering the fifth paragraph of the bill of complaint your respondent denies the conclusions therein stated.

And now comes your respondent as cross complainant and files this her cross bill against the said Jesse H. Smith, complainant and cross respondent and shows unto the court as follows:-

(a). That your cross complainant adopts and makes a part of this her cross bill all matters set forth in her answer hereinabove made.

(b). That since to-wit: the month of March, 1927, your cross complainant and the cross respondent have not lived together as man and wife, your cross complainant being compelled to live

(page two)

separate and apart from the cross respondent on account of the matters and facts hereinafter alleged.

(c). That for sometime prior to the time of their separation the said Jesse H. Smith, the cross respondent, treated your cross complainant in a cruel and inhuman manner; that his conduct was such that your cross complainant had reason to apprehend and did apprehend the commission of actual violence on her person by the said Jesse H. Smith, attended with danger to life or health of your cross complainant; that the said Jesse H. Smith on numerous occasions threatened to do her bodily harm, attempted at different times to strike her and threatened her in other ways.

(d). That the said cross respondent is an able bodied man in good health, a skilled cabinet maker and is able to, has and does earn a substantial salary and is possessed of properties to the extent of Three Thousand Dollars (\$3,000.00) or more; that your cross complainant has no means of livelihood and is without any income.

PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your cross complainant prays that there be issued or caused to be issued all such notices and summons to the said Jesse H. Smith, necessary to make him cross respondent in this cause and requiring him to appear and plead, answer or demur to this cross bill within the time and under the pains and penalties prescribed by law and the rules and practices of this court; that a reference be ordered held by the Register of this court to ascertain and fix a reasonable amount to be paid to your cross complainant as alimony pendente lite and permanent, and as counsel fees to your cross complainant in this cause; that your Honor will decree unto your cross complainant a suitable amount to be paid her by the cross respondent as such alimony pendente lite and counsel fees; that upon a final hearing of this cause your Honor will render and grant unto your cross complainant a divorce

(page three)

mensa et thoro from the said cross respondent and will further grant and decree unto your cross complainant suitable amount to be paid to her by the said Jesse H. Smith as permanent alimony. And, as in duty bound, your cross complainant will ever pray, etc.

NORBORNE STONE
Solicitor for Cross Complainant.

FOOT NOTE:-

The cross respondent, Jesse H. Smith, is required to answer each and every paragraph of the foregoing cross bill from "a" to "d," but answer under oath is hereby expressly waived.

NORBORNE STONE,
Solicitor for Cross Complainant.

ELLA A. SMITH, the respondent and cross complainant and a witness for respondent and cross complainant, being duly sworn, testifies as follows:-

That both she and Jesse H. Smith, the complainant and cross respondent in this cause are over the age of 21 years; both are bona fide residents of Fairhope in Baldwin County, Alabama and had been such for over two years immediately next preceding April 4th., 1927. That Ella A. Smith and Jesse H. Smith were married on October 15th., 1908 and they lived together as man and wife until during the month of March, 1927 and I was compelled to live separate and apart from Jesse H. Smith, my said husband, on account of his cruelty towards me.

The said Jesse H. Smith treated me in a cruel and inhuman manner; he is a man of ungovernable temper and would often go into a rage and his conduct was such that I had reason to apprehend and did apprehend the commission of actual violence on my person by the said Jesse H. Smith attended with danger to life or health; on other occasions he attempted to strike me.

I have given the said Jesse H. Smith no just cause or legal excuse to treat me as he did.

Ella A. Smith.

HAZEL LOWELL, a witness for the respondent and cross complainant being duly sworn, testifies as follows:-

My name is Hazel Lowell and I live at Fairhope in Baldwin County, Alabama where I have lived continuously for the past 11 years. I am over 21 years of age and am a niece of Ella A. Smith, the respondent and cross complainant in this case. I know that both Ella A. Smith and her husband Jesse H. Smith are over 21 years of age and were over this age on April 4th., 1927; that on April 4th., 1927 they were both bona fide residents of Baldwin County, residing at Fairhope where they had lived for something like two years next immediately preceding said date; they were married many years ago and lived together as man and wife up until a few months ago, sometime in March I believe it was, when they separated. I know that Jesse H. Smith has treated Ella A. Smith in a cruel and inhuman manner. I know from personal knowledge of what he has done and threatened to do that she has every reason and had every reason to apprehend the commission of actual violence on her person attended with danger to life or health. His conduct became so bad that some one of her relatives were compelled to go there and stay with her every night. I have often stayed with her on account of these conditions. During the month of March they each began to occupy separate cottages on their properties and this condition has continued since that time.

I know of no reason that he had for treating his wife as he did.

Hazel Lowell

STATE OF ALABAMA
COUNTY OF BALDWIN

IN CIRCUIT COURT
IN EQUITY

Jesse H. Smith, Complainant,

vs.

Bill of Complaint for Divorce.

Ella A. Smith, Respondent,

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

Your Orator, Jesse H. Smith,
respectfully shows into your Honor as follows:

First

That he is a citizen of the United States, over the age of twenty one years, and has been a bona fide resident of this state and county for more than one year next preceding the filing of this Bill, residing at the town of Fairhope therein;

Second

That the Respondent, Ella A. Smith, is over the age of twenty one years and resides at the said town of Fairhope, in such county and state;

Third

That the Complainant and the respondent intermarried on or about the fifteenth day of October, 1908, at Indianapolis, in the state of Indiana, and ever since have been and now are lawful husband and wife;

Fourth

That, at the time of entering into such relationship, the said respondent, Ella A. Smith, was physically ~~incapacitated~~ and incurably incapacitated from entering into the marriage state, which condition was well known to the respondent, and that such incapacity exists at the date of the filing of this Bill;

Fifth

That such incapacity is, under the provisions of Section 7407 of the Alabama Code of 1903, a ground for absolute divorce;

The premises considered, your Orator respectfully prays that the said Ella A. Smith be made party Respondent to this Bill of Complaint, by the usual process of this Honorable Court, and that she 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

Wherefore, your Orator prays that, upon the final hearing of this cause, the bonds of matrimony now and heretofore subsisting between himself and Ella A. Smith be wholly dissolved and that he be granted by this Honorable Court an absolute divorce therefrom; and that your orator may have such other and further relief as to the Court shall seem equitable and just in the premises.

Fairhope, Baldwin county, Alabama,
this 31st day of March, 1927.



Solicitor for Complainant
Fairhope, Alabama.

The Respondent above named is required to answer every allegation contained in the foregoing Bill, paragraphs first to fifth inclusive, but not under oath; answer under oath being hereby expressly waived.



Solicitor for Complainant.

The State of Alabama, }
Baldwin County.

No. 672.

CIRCUIT COURT, IN EQUITY

Sarah Flowers

Complainant

vs.

Rena Flowers,

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 adultery committed by the defendant Rena Flowers,

It is further ordered, that the said Sarah Flowers,

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 Sarah Flowers,

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 Rena Flowers

It is further ordered, adjudged and decreed that said Sarah Flowers,

shall not again marry except to said Rena Flowers,

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Rena Flowers, during the pendency of said appeal

This 8th day of August 1927

August

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.

No. 672

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Sarah Flowers,

vs.

Rena Flowers,

DECREE OF DIVORCE.

Filed in office this

8th

day of

August, 1927

T. W. Pickens

Register.

E. O. M.

Handwritten notes and signatures in the right margin, including the name 'T. W. Pickens' written vertically.

SARAH FLOWERS,
Complainant,

-vs-

RENA FLOWERS,
Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA.
BALDWIN COUNTY.

TO THE HON. THE CIRCUIT COURT-EQUITY SIDE, STATE OF
ALABAMA, BALDWIN COUNTY AND THE HON. JOHN D. LEIGH,
JUDGE THEREOF, SITTING INEQUITY:-

Comes your complainant, Sarah Flowers and exhibits
this her Bill of Complaint for divorce against the respondent Rena
Flowers and shows:-

(1). That both your complainant and the respondent
are over the age of 21 years, are bona fide residents of Baldwin
County, Alabama where they have resided for more than ~~two~~ ^{two} years
next immediately preceding the filing of this bill of complaint.

(2). That your complainant and the respondent were
married about 18 years ago and lived to-gether as husband and
wife until about two months ago, when, on accounts of the matters
hereinafter complained of, your complainant was compelled to live
separate and apart from the respondent.

(3). That the respondent, about two months ago, comm-
itted adultery with one Essie Faulk; that the acts of adultery were
committed in Baldwin County, Alabama; that said adulterous relat-
ions between the respondent and the said Essie Faulk were without
the knowledge, agency, connivance or consent of your complainant
and she has never condoned the same.

(4). There were born to your complainant and the said
respondent by said marriage six children, viz: Leonard, a son, 16
years of age, Lecy, a daughter, 13 years of age, Myrtle, a daugh-
te r 9 years of age, Samuel, a son, 7 years of age, Jack, a son, 4
years of age and Ruby, a daughter, 2 years of age.; that all of
said children reside with and are in the custody and under the con-
trol of your complainant who is a fit and proper person to have the

(page two)

custody and control of them; that the said respondent is not a fit and proper person to have the care, custody and control of said children.

PRAYER FOR PROCESS AND RELIEF:

THE PREMISES CONSIDERED, your complainant prays that all necessary notices, orders and decrees be made, entered and issued necessary to make the said Rena Flowers party defendant hereto requiring him to appear and plead, answer or demur within the time and under the pains and penalties prescribed by law and the rules of this court; that upon a final hearing of this cause that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between your complainant and the defendant be forever dissolved; that your complainant be again permitted to contract the marriage relation should she so desire; that your honor will further render, adjudge and decree that your complainant is a fit and proper person to have the care, custody and control of such children and that the same be awarded to her. And, as in duty bound, she will ever pray, etc.

NORBORNE STONE,
Solicitor for Complainant.

FOOT NOTE:-

The respondent, Rena Flowers, is required to answer each and every paragraph of the foregoing complaint from 1 to 4, both inclusive, but not under oath as oath is hereby expressly waived

NORBORNE STONE,
Solicitor for Complainant.

Original
all

Sarah Flowers
vs
Benjamin Flowers

Divorce

Filed June 4/927
T. W. Peirson

RECORDED

The State of Alabama,
Baldwin County.

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

Sarah Flowers

Complainant.

VS.

Rena Flowers,

Respondent.

I, T.W. Richerson,

as Register and Commissioner

have called and caused to come before me Sarah Flowers and Edward Faulk,

witnesses named in the Requirement for Oral Examination, on the 25th day of July,

1927, at the office of Register,

in Bay Minette, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Witnesses,

doth depose and say as follows:

[The remainder of the page is a large area of dotted lines, which is crossed out by a diagonal line from the top of the 'doth depose' section down to the bottom right corner.]

SARAH FLOWERS, the complainant and a witness for complainant, being duly sworn, testifies as follows:-

My name is Sarah Flowers and I am the complainant in that certain cause now pending in the Circuit Court Equity Side, of Baldwin County, Alabama, wherein my husband Rena Flowers is the respondent. Both I and the respondent were on June 4th., 1927 over the age of 21 years and were bona fide residents of Baldwin County, Alabama, where we had resides for more than three years next immediately preceding said date; that I and the respondent were married about 18 years ago and we lived to-gether as man and wife until about two months before I filed this suit for divorce. On account of my husband living in adultery I was compelled to leave him about two months before I filed my suit for divorce and we have never lived to-gether as man and wife since that time. For several months before I filed my bill for divorce my husband was continually with Essie Faulk. On several occasions he would spend the night down at her home and while her husband was away. On several occasions I noticed my husband under very compromising circumstances with this Essie Faulk. I have seen him at night go out with her and just the two of them along. Essie Faulk is married, being the wife of my brother.

I was present in the Mayor's Court of the Town of Bay Minette about two months before I filed my suit for divorce when they tried the respondent Rena Flowers in the court for living in adultery with Essie Faulk. The witnesses who testified against him gave their testimony before him in open court and he made no denial. He was convicted at this trial for living in adultery. Since said date I have not lived with him as his wife. The living in adultery between the respondent and the said Essie Faulk were without my knowledge, agency, connivance or consent and I have never forgiven the same.

There were born to me and the respondent by our marriage six children: Leonard, Lacy, Myrtle, Samuel, Jack and Ruby; that all of said children were living with me and were in my custody and under my control at the time I filed my bill for divorce but recently I have let the respondent have all of them except Ruby and he came and took Ruby without my consent and they are all with him at this time.

Sarah Flowers

EDWARD FAULK, a witness for complainant, being duly sworn, testifies as follows:-

My name is Edward Faulk and I am over 21 years old and live at Bay Minette, Alabama. I am the brother of Sarah Flowers the complainant in this case and I am the husband of Essie Faulk, the co-respondent in this case. On June 4th., 1927, Sarah Flowers and her husband, Rena Flowers were both over 21 years and bona fide residents of Baldwin County, Alabama, where they had resided for more than three years next immediately preceding said date; that

(page two)

they were married about 18 years ago and lived to-gether as husband and wife until about two months prior to said date. About two months prior to June 2nd., 1927 the said Rena Flowers and Essie Faulk, my wife, committed acts of adultery on numerous occasions when I had seen them under suspicious circumstances. I had found them at my house at all times of the day and night and I had seen them to-gether at different places. On this date about two months prior to June 2nd., 1927, I found Rena Flowers and Essie Faulk in the act of sexual intercourse at my home in Bay Minette. This was about 12 o'clock at night. I went and got the officers and they were both arrested.. The next morning they were both tried and convicted in the Mayor's Court of Bay Minette, Alabama. All of these illicit acts between Rena Flowers and Essie Faulk were committed in Baldwin County, Alabama. I have not lived with my wife since that time.

Edward Faulk

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 witness es and read over to them and they signed the same in the presense of myself Hon. E.C. Stone, Atty for Complainant.

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; 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 25th day of July, 192 7.

T.W. Richerson (L. S.)



NO. PAGE

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

Sarah Flowers

vs. Complainant

Rena Flowers,

Respondent.

Oral Deposition

Filed July 25th, 192 7

T.W. Richerson, Register.

Recorded in

Record

Vol. Page

T.W. Richerson, 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 Rena Flowers,

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 Sarah Flowers,

against said Rena Flowers,

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 4th day of June, 1927.

T. W. Richerson Register.

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

Original 1st

1st

THE STATE OF ALABAMA,
BALDWIN COUNTY.

SERVICION

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

Sarah Flowers,

vs.

Rena Flowers,

Norborne Stone.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED

Received in office this _____ 4th

day of _____ June _____ 192⁷

Sheriff.

Executed this *11th* _____ day of

June _____ 192⁷

by leaving a copy of the within Summons with

Rena Flowers

Defendant.

Lo Scurie

Sheriff.

By *B. D. Viggish* Deputy Sheriff.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 672 Vacation Term, 1927

Sarah Flowers, , Complainant...

vs.

Rena Flowers, , 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 N.C. Stone, 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.

..... N.C. Stone,
Solicitor for Complainant.

No. 672.....

5

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Sarah Flowers,

vs.

Rena Flowers,

REQUEST FOR DECREE IN
VACATION

FILED July 25th 1927

D. W. Williams
Register

RECORDED IN RECORD

VOL. PAGE

RECORDED

Register

8581 NOTE OF TESTIMONY

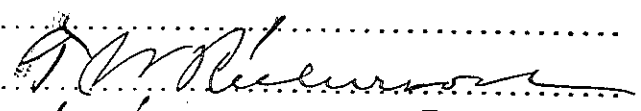
Sarah Flowers
.....
.....
.....
vs.
Rena Flowers,
.....
.....
.....

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 Sarah Flowers and Edward Faulk,
.....

.....
.....
.....
and in behalf of Defendant upon


Register.

No. 672.

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Sarah Flowers,

vs

Rena Flowers,

NOTE OF TESTIMONY

Filed in Open Court this 25th,

day of July, 1927.

J. W. [Signature]

Register

MOORE PTG CO

RECORDED
INDEXED

The State of Alabama, }
Baldwin County.

No. 672.

CIRCUIT COURT, IN EQUITY

Sarah Flowers,

Complainant

vs.

Rena Flowers,

Defendant

In this cause it appears to the

Register,

that a Summons requiring the Defendant

Rena Flowers,

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said

Summons upon Rena Flowers,

was served upon him by the Sheriff of Baldwin County, Alabama, on the

11th day of June 1927.

And the said Defendant, having failed to demur, plead to or answer the said Bill of Complaint to this date,

it is now, therefore, on motion of Hon. W. C. Stone,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed

against the said Rena Flowers,

Defendant... aforesaid.

This 25th day of June 1927

D. W. Peterson

Register.

3

No. 672 Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.

Sarah Flowers

Vs.

Rena Flowers,

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued 18th July 1927

J. M. Rice
Register.

RECORDED

The State of Alabama, }
BALDWIN COUNTY.

No. 672 CIRCUIT COURT IN EQUITY.

..... Sarah Flowers, Complainant.....

vs.

..... Rena Flowers, Defendant.....

Motion is hereby made for a Decree Pro Confesso against ~~Rena Flowers~~
..... Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant.....ha.S..... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 18th day of July 1927.

Tom Rice
..... Solicitor.

2

No. 672

Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Sarah Flowers,

Vs.

Hena Flowers,

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed July 28th 1927.

J. W. Richardson

Register.

Recorded in Record,

Vol. Page.

Register.

Baldwin Times Print, Bay Minette.

RECORDED