

Edward H. Titus

Complainant

vs.

Hattie Teller Titus

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 Edward H. Titus 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 Edward H. Titus 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 Hattie Teller Titus

It is further ordered, adjudged and decreed that the said Edward H. Titus shall not again marry except to said Hattie Teller Titus until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Hattie Teller Titus during the said pendency of appeal

This 19th day of August 1929.

J. W. Hare
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 _____ 19____,

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 _____

ML

No. 780

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

Edward E. Titus

vs

Opie Teller Titus

DECREE OF DIVORCE

in office this 19th

Aug, 1929

W. Mic...
Register.

M. _____

RECORDED

RECORDED

780

Edward H Titus

CIRCUIT COURT OF

Hattie Pearl Titus vs. Hattie Pearl Titus

Baldwin COUNTY.

IN EQUITY.

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

did, on the 25 day of Oct 1928, send to

Hattie Pearl Titus

Defendant.

whose address was Princeton Illinois

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 29th day of Oct 1928

Witness my hand, this 1st day of Nov 1928

T W Rice

Register.

No. 780

CIRCUIT COURT OF
BALDWIN COUNTY.
IN EQUITY.

Edward A. Titus

vs.

Hattie Fuller Titus

CERTIFICATE OF REGISTER AS TO NOTICE
BY REGISTERED MAIL.

Filed in office on this 1st

day of Nov 1928

W. W. Richardson

Register.

RECORDED

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

The bill of complaint of EDWARD H. TITUS respectfully shows unto Your Honor as follows:

FIRST

The complainant is a resident of the County of Baldwin, State of Alabama, and has so permanently resided therein for upwards of three years next preceding the filing of this bill, and he has been such resident since the year 1910.

SECOND

Complainant and HATTIE TELLER TITUS were married, each to the other, about the year 1909, and have lived and resided together as man and wife in said County of Baldwin, State of Alabama. The said Hattie Titus is upwards of twenty-one years of age and now resides in the City of Princeton, State of Illinois, and her Post Office address is Princeton, Illinois.

THIRD

Complainant shows unto Your Honor that the said Titus voluntarily abandoned his bed and board more than two years next preceding the filing of this bill and for more than that period of time has had her a permanent residence in said City of Princeton, State of Illinois.

FOURTH

Complainant shows unto Your Honor that no children were born unto said complainant and respondent as the result of said marriage.

PRAYER

The premises considered, your complainant respectfully prays that notice may be given to said respondent Hattie

Tellier Titus by publication, as required by law and the rules of this Honorable Court, requiring her to appear in this cause and to plead, answer or demur to this bill of complaint within a time to be fixed by this Honorable Court, or by rules and statutes governing such cause.

And your complainant further prays that upon a hearing of this cause your Honor will be pleased to enter a decree granting him an absolute divorce from the said Hattie Tellier Titus & dissolving the bonds of matrimony existing between them.

And your complainant further prays for all such other and further or different relief as to Your Honor may seem suitable under the circumstances of the case.

And, as in duty bound, will ever pray, etc.

Gaillard Gaillard
Solicitors for Complainant

FOOT-NOTE: Respondent is required to answer each paragraph contained in the foregoing bill of complaint, but answer under oath is expressly waived.

Gaillard Gaillard
Solicitors for Complainant

STATE OF ALABAMA)

COUNTY OF MOBILE)

Before me, Mae Satow, a Notary

Public in and for said State and County, personally appeared Edward H. Titus, who, being by me first duly sworn, says that the allegations contained in the foregoing bill of complaint are true.

E. H. Titus

Subscribed and sworn to before me this 9th day of October, 1928.

Mae Satow
Notary Public, Mobile Co., Ala.

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

PTA
Costs
769

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 _____

Ed H Titus vs Hattie J. Titus

TO NON-RESIDENT
of Alabama, Baldwin
County, Equity.
1st day of November, 1928.
Edward H. Titus vs. Hattie Teller
Titus.
In this cause it being made to ap-
pear to the Clerk of this Court by the
Affidavit of E. H. Titus that
Defendant Hattie Teller
Titus, is a non-resident of the
State of Alabama and resides in
Macon, Illinois, and further, that
the bearer of said Affidavit, the De-
fendant is over the age of 21 years; it
is therefore ordered that publication
be made in the Baldwin Times, a
Newspaper published in Bay Mi-
nette, Baldwin County, Ala-
bama, for _____
weeks for _____

Filed

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

Date of first publication	<u>November 1 - 1928</u>	Vol. <u>39</u>	No. <u>40</u>
Date of second publication	<u>November 8 1928</u>	Vol. <u>39</u>	No. <u>41</u>
Date of third publication	<u>November 15 1928</u>	Vol. <u>39</u>	No. <u>42</u>
Date of fourth publication	<u>November 22 1928</u>	Vol. <u>39</u>	No. <u>43</u>

Subscribed and sworn to before the undersigned this 22^d day of December 1928
R. B. Vail
Publisher.

D. W. Rice
Clerk Circuit Court

Costs 769

EDWARD H. TITUS, Complainant,

IN CIRCUIT COURT
BALDWIN COUNTY
ALABAMA

vs.

HATTIE TELLER TITUS, Defendant.

IN EQUITY

State of Alabama,)
(ss. A F F I D A V I T
County of Baldwin)

Edward H. Titus, being by me first duly sworn, on oath says: that he is the Complainant (and Cross-Respondent) in the above entitled action; that he is 71 years of age and in poor health, suffering with tuberculosis, and that he is unable to work and earn his own livelihood and is subsisting upon a small income of two hundred dollars per year derived from property; that he is the owner of forty acres of land in Baldwin county, Ala., worth approximately four thousand dollars, from which he receives no revenue whatever; that he is the owner of 160 acres of farm land in North Dakota, assessed at \$1240., worth not more than \$2400.00, from which he derives an income of \$110. per year, and that he is the owner of personal property, in bonds of the Town of Fairhope, Alabama, in the amount of \$1500., from which he derives an income of \$90. a year, making a total yearly income for his support of two hundred dollars a year, as above set forth; that all of the above property was acquired by his own unaided efforts and without any help or assistance whatever from his wife, Hattie Teller Titus, the Defendant herein;

that the Defendant, Hattie Teller Titus, is a woman in good health, several years younger than the Complainant, and is living entirely from income derived from certain properties owned by her in the city of Princeton, Illinois, and is under no necessity whatever of working or earning her own livelihood, and that such income amounts to about Twenty Five Hundred Dollars a year; that the Defendant abandoned this Complainant more than twelve years ago and during all of that time has been busily engaged in acquiring and securing property in her own name and right, at the said Princeton, Illinois, and that the real and personal property of the Defendant, Hattie Teller Titus, amounts

8581 NOTE OF TESTIMONY

Edward H. Titus

.....
.....
.....

vs.

Hattie Teller Titus

.....
.....
.....

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 Respondent and testimony of Edward H. Titus and Frank
Milefehick

.....
.....
.....
.....

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

T. W. Stevenson

Register.

No. 780

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Edward H Titus

VS

Hattie Belle Titus

NOTE OF TESTIMONY

Filed in Open Court this 17th

day of Aug 1929

D. M. Mc...

Register

STATE OF ALABAMA
COUNTY OF BALDWIN

IN CIRCUIT COURT
IN EQUITY

EDWARD H. Titus, Complainant,

vs.

HATTIE TELLER
Mrs. E. H. Titus, Defendant.


NOTICE OF APPEARANCE

To the Hon. T. W. Richerson,
Register of the said Circuit Court.

Sir:-

You will please take notice that, following upon the voluntary withdrawal of appearance of Gaillard, Mahorner, & Gaillard, of Mobile, Ala., as counsel for Complainant in the cause above entitled, under arrangement with them and a retainer by the Complainant in such action, I hereby enter my appearance as Counsel for Complainant and respectfully request that you make proper entry thereof upon your "Book of Appearances" and of your files in such action.

Dated at Fairhope, Ala., March 25th, 1929.


Solicitor and Counsel for Complainant

Co

State of Alabama
County of Baldwin

IN CIRCUIT COURT
IN EQUITY

TITUS vs. TITUS

Notice of Appearance
as Counsel

By Edward P. Totten,
Fairhope, Ala.

Filed *over* 27/29
J. W. K...
Reg...

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

[Faint signature or stamp, possibly a notary seal]

EDWARD H. TITUS,

Complainant,

vs.

HATTIE TELLER TITUS,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

We hereby withdraw our appearance for complainant in the above entitled cause and Judge Edward P. Totten will file his appearance for complainant.

Gailard Makomer Arnold

2
In Equity

Edward H. Titus

vs

Hattie Julia Titus

Withdrawal of appearance
by Gailard Mahon & Gailard
Att. for complt

Filed Mar 24/1929

T. W. Reiman
Register

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

The Bill of Complaint of Edward H. Titus, respectfully shows unto your Honor as follows:

1.

The Complainant is a resident of the County of Baldwin State of Alabama, and has so permanently resided therein for upwards of three years next preceding the filing of this Bill, and has been such resident since the year 1910.

2.

Complainant and Hattie Teller Titus, were married, each to the other, about the year 1909, and have lived and resided together as man and wife in said County of Baldwin State of Alabama. The said Hattie Titus is upwards of twenty-one of age and now resides in the City of Princeton, State of Illinois, and her post Office address is Princeton Illinois.

3.

Complainant shows unto your Honor that the said Hattie Teller Titus voluntarily abandoned his bed and board more than two years next preceding the filing of this Bill and for more than that period of time has had her a permanent residence in said City of Princeton, State of Illinois.

4.

Complainant shows unto Your Honor that no children were born unto said Complainant and Respondent as the result of said marriage.

PRAYER.

The premises considered, Your Complainant respectfully prays that notice may be given to said Respondent Hattie Teller Titus by publication, as required by law and the rules of this Honorable Court, requiring her to appear in this cause and to plead, answer or demur to this Bill of Complaint, within a time to be fixed by this Honorable Court, or by the rules and statutes governing such cause.

And further Complainant prays that upon such a hearing of this cause Your Honor will be pleased to enter a decree granting him an absolute divorce from the said Hattie Teller Titus, and dissolving the bonds of matrimony existing between them.

And your Complainant further prays for all such other and further or different relief as to Your Honor may seem suitable under the circumstance of the case.

FOOT NOTE:

Respondent is required to answer each paragraph contained in the foregoing bill of complaint, but answer under oath is expressly waived.

Caillard & ~~Caillard~~ Gaillard
Solicitors for Complainant.

Copy of Bill
used for original
Bill

Filed Oct 25 / 1928
J W Reamer
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 Hattie Keller Titus,

Princeton, Illinois,

of _____ 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

Edward H. Titus,

against said

Hattie Keller Titus,

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 October 1928.

T. W. Richerson Register

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

SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

Edward H. Titus

vs.

Hattie Teller Titus

Gaillard & Gaillard.

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.

October 25th, 1928.
Copy of bill and summons
registered Deft at Princeton
Illinois.

J. W. Ricc...
Register.

The State of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon _____

Edward H. Titus,

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

Hattie Waller Titus

against said Edward H. Titus,

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 20th day of

Nov 1928

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

Edward H. Titus

vs.

Hattie Meller Titus

*Have copy on
Edward H Titus
Fairhope
Ala*

N. Stone

CROSS

Solicitor for Complainant

Recorded in Vol. Page

Summons on cross Complainant

THE STATE OF ALABAMA.
BALDWIN COUNTY

Received in office, this
day of 192

Sheriff.

Executed this *21* day of
Nov. 192 *8*

by leaving a copy of the within Summons with

Edward H. Titus

Defendant.

C. J. J. J.

Sheriff.

By
Deputy Sheriff

STATE OF ALABAMA

COUNTY OF BALDWIN

IN CIRCUIT COURT

IN EQUITY

EDWARD H. TITUS, Complainant,

vs.

HATTIE TELLER TITUS, Defendant.

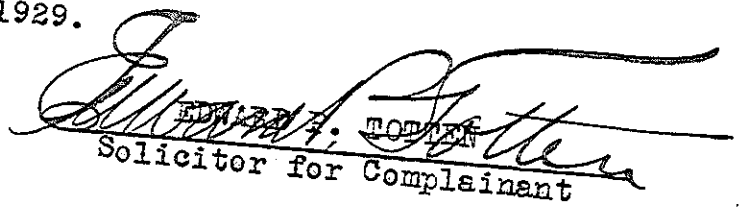
NOTICE OF TAKING TESTIMONY

To the Honorable T. W. Richerson,
Register of the Circuit Court, and to
The Honorable Norborne Stone,
Solicitor for Defendant.

Sirs:-

You will please take notice that, the cause above entitled being at issue, the Complainant therein desires, expects and intends to submit testimony, by oral deposition, in support of the allegations of his Bill of Complaint and of his Answer to the cross-bill of Defendant, before Hon. T. W. Richerson, Register of the Circuit Court, at the office of the Register in the Court House at Bay Minette, Baldwin county, Alabama, on Friday, the 16th day of August, 1929, at the hour of 10:00 o'clock, A. M., and that Complainant will appear personally with his witnesses, J. H. Titus and Frank Milifchek, at said time and place.

Dated August 9th, 1929.


EDWARD H. TITUS
Solicitor for Complainant

(Fairhope, Ala.)

Service of the above Notice of Taking Testimony is admitted, by receipt of a copy thereof, this 10 day of August, 1929.


Norborne Stone
Solicitor for Respondent

(Bay Minette, Ala.)

THE JUDICIAL OFFICE

IN MATTER OF

EDWARD H. PITMAN

VS

HARRIS PULLER PITMAN

WITNESSETH THAT THE ABOVE

IS

THE TRUE AND CORRECT COPY

Filed Aug 12th/1929
D. W. Kishner
Register

Edward H Pitman
vs
Harris Puller Pitman

Notice of Taking
Testimony.

(S.A. 1000)

(S.A. 1000)

EDWARD H. TITUS, Complainant,

vs.

HATTIE TELLER TITUS, Defendant.

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

ANSWER of COMPLAINANT to CROSS-BILL

Comes now the Complainant and, for an answer to the Cross-Bill of the Defendant filed herein, shows to the Court, in response to Paragraph "A" of said Cross-Bill:


That, for more than ten years next preceding the filing of his Bill herein, the Complainant has been, as he now is, a resident of Baldwin county, Alabama, at all times maintaining his home in said county and state, and that at the date and time set forth by the Defendant, to-wit:- the month of September, 1926, the Defendant had abandoned the Complainant and was living separate and apart from him, voluntarily and of her own choice, and without any default or failure of duty on the part of the Complainant;

Complainant further shows to the Court, in response to Paragraph "B" of said Cross-Bill:

That during all of the time the said Defendant, Hattie Teller Titus, lived with the Complainant as his wife at his said home in Baldwin county, Alabama, the Complainant amply and bountifully provided for her necessities and comforts, and that since Defendant's abandonment of the Complainant she has been supporting herself out of the income of her own property and has not been at any time obliged to earn her own livelihood; that the Defendant is the owner and in possession of real property at the town of Princeton, Illinois, of the reasonable worth and value of more than Forty Thousand Dollars (\$40000.00) and that she derives a revenue and income from the said real property of more than Two Hundred Dollars per month; That the total value of the real and personal property of the Complainant, named by Defendant, does not exceed the sum of Eight Thousand Dollars, and that the present income derived therefrom by Complainant is Two Hundred Dollars (\$200.) per year.

WHEREFORE, Complainant prays that this Honorable Court will dismiss the Cross-Bill of the Defendant, and will decree that the Defendant is not entitled to be paid any amount of money whatever by the Complainant as alimony, either permanent or pendente lite, or as counsel fees herein, and will further decree unto the Complainant an absolute divorce from the said Hattie Teller Titus, wholly dissolving the bonds of matrimony now subsisting between the parties, together with such other relief as may be equitable and proper, as prayed in Complainant's original Bill filed herein.

Dated this 10th day of April, 1929.


Solicitor for Complainant
(Cross-Respondent)

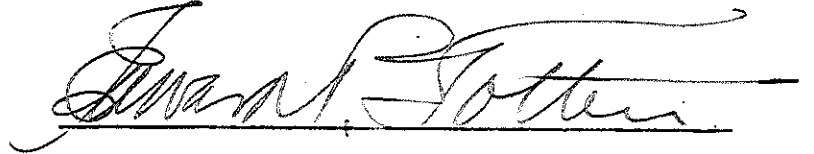
STATE OF ALABAMA,
County of Baldwin.

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

EDWARD H. TITUS, Complainant,
-vs-
HATTIE TELLER TITUS, Defendant.

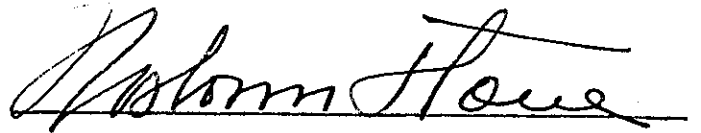
STIPULATION

It is stipulated and agreed by and between the parties hereto, Edward H. Titus, Complainant, vs. Hattie Teller Titus, defendant, and their Solicitors respectively, Edward P. Totten and Norborne Stone, that the ~~cross-bill~~ cross-bill of the defendant shall be and the same is hereby withdrawn from record, and the cause shall now stand submitted.



Solicitor for Complainant

Dated August 17th, 1929.



Solicitor for Respondent

[Faint handwritten notes and signatures at the bottom of the page, including the word 'Copy' and a vertical signature.]

Filed Aug 17/329
T.M. Williams
Register

Agreement

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

Edward H. Titus Complainant.

VS.

Hattie Teller Titus Respondent.

I, T. W. Richerson

as Register and Commissioner

Edward H. Titus
have called and caused to come before me / Frank Milefchik

witnesses named in the Requirement for Oral Examination, on the 17th day of August
1929, at the office of T. W. Richerson, Clerk Circuit Court
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:

[Large area of dotted lines for deposition content]

[Handwritten signature]

[Handwritten signature]

ORAL EXAMINATION.

I, T. W. Richerson, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down in writing by me in the words of the witnesses and read over to them and they signed the same in the presence of myself and Hon. E. P. Totten

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 17th day of August 1929

T. W. Richerson (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Edward H. Titus

vs. Complainant

Hattie Teller Titus

Respondent

Oral Deposition

Filed August 17th, 1929

T. W. Richerson, Register.

Recorded in

Record

Page _____

Vol. _____, Register

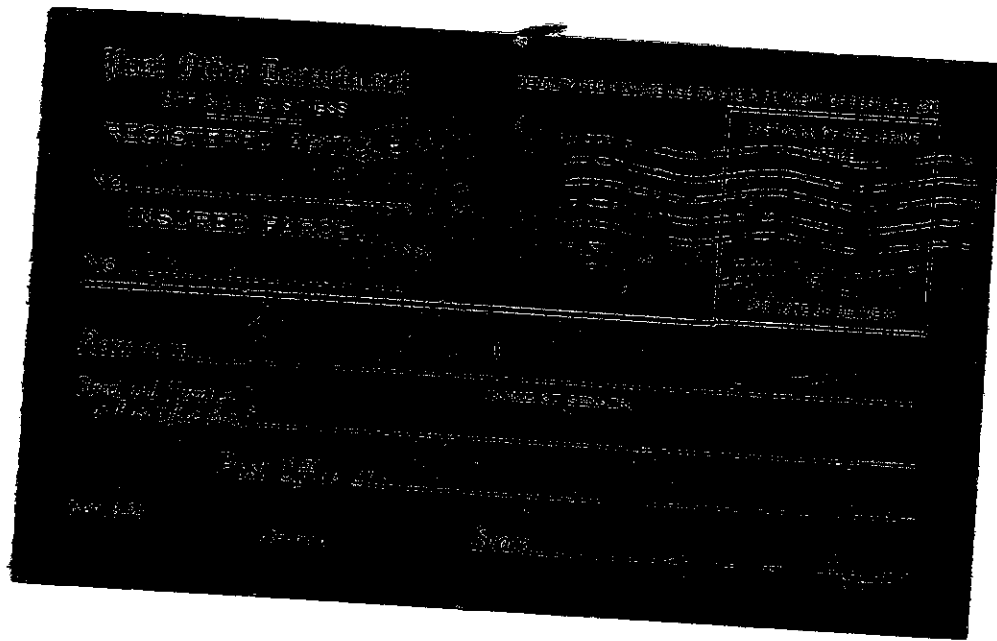
Edward H. Titus, who being first duly sworn, testified as follows:

Hattie Teller Titus is over 21 years of age, My name is Edward H. Titus, aged 71 years. / I reside in Baldwin County, near Fairhope. I have lived here since about 1910. My home and permanent residence has been in this county during all of the time since that date. The defendant, Hattie Teller Titus and I were married at Ottawa, Illinois, on November, 19, 1908. The first winter after we were married we lived together in Baldwin County, Alabama, as husband and wife, and we lived together as husband and wife in Baldwin County during the winters ~~following~~ of 1910, and the winters following until 1916. She also lived with me in Baldwin County for several weeks during January and February, of 1926. We have never lived together in Baldwin County as husband and wife at other than the times just stated. The defendant has resided and now resides, so far as I know, at Princeton, in the state of Illinois, since 1916, with the exception of the several weeks that she lived with me in Baldwin County, during the year 1926. The defendant left my home in February, 1926, and returned to Princeton, Illinois. I went North in the Spring of 1926, and visited her at her home in Princeton, Illinois, while I was working in the State of Illinois. On September, 22nd, 1926, I left Illinois and returned to my home in Baldwin County. I requested the defendant to accompany me to my home in Baldwin County on that date but she refused to come and stayed at her home in Princeton, Illinois. I returned to the same home in Baldwin County that I had had here since 1910, and the home in which the defendant had spent several weeks with me during the preceding January and February of the year 1926. This home was a suitable and comfortable place for occupancy. I did nothing to cause the defendant to leave me in September, 1926, or to refuse to return with me ^{my} to/home in Baldwin County. The action of the defendant in refusing to return home with me and abandon me in 1926 was entirely voluntary on her part. E. H. Titus

Frank Milefchik, a witness for the Complainant, after having been duly sworn, testified as follows:

My name is Frank Milefchik. I am sixty-eight years of age, and I live on a farm near Fairhope, Alabama, where I have lived since January, 1914. I have known the complainant, Edward H. Titus, and the defendant, Hattie Teller Titus, since the year 1915 or 1916. He has had his home and has lived in Baldwin County all the time since I have known him, except that he would go away in the summers to work at his business repairing sewing machines. I have lived about two miles from him during all that time, and have been closely associated with him. I have been to his house often during the years since 1916, and know that the defendant has not lived with him except for a short time in the months of January and February, 1926. Hattie Teller Titus and Edward H. Titus are over 21 years of age.

Frank J. Milefchik



RETURN RECEIPT

Received from the Postmaster
number of copies appears on the face of the Card

Received on demand article for material
Mr. Card
Hattie J. Mrs. L. J. Jones

10-29

ms