

MAZIE LUCAS,
Complainant,

-vs-

JOHNNIE LUCAS,
Defendant,

|||||

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

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

Dated this 16th day of May, 1929.

^{his}
Johnnie Lucas
mark

ATTEST:

Henry Thompson
Gladys Bush

8581 NOTE OF TESTIMONY

.....Mazie Lucas.....

.....

.....

vs.

.....Johnnie Lucas,.....

.....

.....

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 Deft and testimony of Mazie Lucas and Cammolia Thompson,

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and in behalf of Defendant upon.....

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T. W. Heavner

Register.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 808

Term time

Sept 27, 1929

Mazie Lucas

, Complainant

vs.

Johnnie Lucas,

, Defendant

To T.W. Richerson, Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by H.D. Moorer

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

H.D. Moorer

Solicitor for Complainant.

MAZIE LUCAS

vs

JOHNNIE LUCAS,

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

Comes Mazie Lucas, after the consent of the court first having been obtained and amends her bill for divorce by striking out the third paragraph and the following as the third paragraph:-

That Your Oratrix and the said Johnnie Lucas were lawfully married on August 13th., 1923, and lived together as husband and wife until March 13, 1929, at which time the said Johnnie Lucas committed actual violence on your Oratrix attended with danger to her life or health and that from the conduct of the said Johnnie Lucas she had reasonable apprehension of such violence as to endanger her life or health. Said act was committed in Baldwin County, Alabama.

Mazie Lucas

STATE OF ALABAMA,
BALDWIN COUNTY.

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IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

Your Oratrix, Mazie Lucas, respectfully represents and shows
unto Your Honor as follows:-

FIRST:

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

SECOND:

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

THIRD:

That Your Oratrix and the said Johnnie Lucas were lawfully married
August 13, 1923, and lived together as husband and wife until,
to-wit:- on or about March 13th., 1929, at which time the said Johnnie Lucas
committed the act of adultery with one Iler Lambert; that Your Oratrix did
not connive or condone said offense; said act was committed in Baldwin County,
Alabama, and they have not lived together since.

FOURTH:-

That before her marriage to the said Johnnie Lucas, Your oratrix's
name was Mazie Thompson and that she now wishes to resume the name of Mazie

Thompson.

THE PREMISES CONSIDERED Your Oratrix respectfully prays that the said Johnnie Lucas be made party respondent to this bill of complaint by the usual process of this Honorable Court; that such orders, decrees and publications be made as necessary to perfect service on the said Johnnie Lucas and that he be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your Honor will grant unto Your Oratrix an absolute divorce from the said Johnnie Lucas.

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

HENRY D. MOORER,
Attorney for Complainant.

FOOTNOTE:

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

HENRY D. MOORER,
Attorney for Complainant.

The State of Alabama,
Baldwin County.

} Circuit Court of Baldwin County, In Equity.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon ~~MAZIE LUCAS~~

Johnnie Lucas,

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

Mazie Lucas,

against said

Johnnie Lucas,

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 15th day of May 1929.

T. W. Richerson Register.

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

The State of Alabama, }
Baldwin County.

No. 808

Circuit Court, in Equity.

Mazie Lucas Complainant

vs.

Johnnie Lucas, 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 cruelty,

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It further orderd, that the said Mazie Lucas be, and s he 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 Mazie Lucas 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

Johnnie Lucas

It is further ordered, adjudged and decreed that said Mazie Lucas shall not again marry except to said Johnnie Lucas until sixty days after this date, and that if an appeal is taken within sixty days s he shall not marry again except to said Johnnie Lucas

during the said pendency of appeal

Complainant is authorized and permitted to resume her maiden name of Mazie's Thompson

This 22nd day of May 1929

F. 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 _____ 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. 808

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY,
BALDWIN COUNTY, ALA.

Mazie Lucas

vs.

Johanne Lucas,

DECREE OF DIVORCE.

Filed in office this

23rd

day of

MAY

1929

J. M. Lucas

Register.

E. O. M.

Moore Printing Co. Bay Minette, Ala.

RECORDED

Original

SERVE ON _____

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

Mazie Lucas

vs.

Johnnie Lucas,

Defendant.

RECORDED

Henry D. Moore

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this 15th

day of May 1929

Sheriff.

Executed this _____ day of

192

by leaving a copy of the within Summons with

Sheriff.

By _____ Deputy Sheriff.

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

5-17-29.
Attest: *Johnnie Lucas*
Henry Thompson
Glady Bush

RECORDED

IN THE CIRCUIT COURT,

MIAMI COUNTY, OHIO

STATE OF OHIO

vs.

IN RE

ESTATE OF

Filed May 21/1929
D.M. Ransom
Register

Amendment to
Complaint

RECORDED

[Faint handwritten signature]

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No. 808

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Mazie Lucas

VS

Johnnie Lucas.

NOTE OF TESTIMONY

Filed in Open Court this 21st

day of May 1929

J. M. Newman
Register

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No. 808

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THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Mazie Lucas

vs.

Johnnie Lucas

REQUEST FOR DECREE IN
VACATION

FILED May 21st 1929

D. W. Rice

Register

RECORDED

RECORDED IN RECORD

VOL. PAGE

Register

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Filed May 21/1929
J. M. McInerney
Register

RECORDED

1929

1929

1929

1929

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

Mazie Lucus
 ----- Complainant.

VS.
 Johnnie Lucas
 ----- Respondent.

I, T.W. Richerson,

 as Register and Commissioner

have called and caused to come before me Mazie Lucus and Cammiola Thompson,

witness named in the Requirement for Oral Examination, on the 21 day of May
 1929, 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 witnesses
 ----- doth depose and say as follows:

TESTIMONY OF MAZIE LUCAS.

My name is Mazie Lucas. I am over 21 years of age and a bona fide
 resident citizen of Baldwin County, Alabama, and have resided in Baldwin County,
 Alabama, for more than three years next preceeding the filing of this bill.
 I am over the age of 21 years. Johnnie Lucas is a citizen of Baldwin County,
 Alabama, residing at Bay Minette, Alabama, he has resided in Baldwin County,
 Alabama, more than three years next preceeding the filing of the Bill for this
 divorce. He is over the age of 21 years. Johnnie Lucas and I were lawfully
 married August 13, 1923, and lived together until about March 13, 1929, at
 which time the said Johnnie Lucas committed actual violence on your Oratrix attended
 with danger to her life or health and that from the conduct of the said Johnnie
 Lucas she had reasonable apprehension of such violence as to endanger her life
 and health. That said act was committed in Baldwin County, Alabama. He struck
 me with his hand and threatened to kill me. He had previously fought me and caused
 bruised places on my body. He had made numerous threats to kill me; he has
 threatened to shoot me and from the conduct of the said Johnnie Lucas, I had
 reasonable apprehension of such violence as to endanger my life and health. I am
 afraid to live with him. I wish to resume the name of Mazie Thompson.

Subscribed and sworn to before me
 this 21st. day of May, 1929.

T.W. Richerson
 REGISTER.

Mazie Lucus

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 presence of myself and Hon. H. D. Moorer, 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 21st day of May 1929

T. W. Richerson (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Mazie Lucas

vs. Complainant

Johannie Lucas

Respondent.

Oral Deposition

Filed May 21st, 1929

T. W. Richerson Register.
Recorded in _____ Record

Vol. _____ Page _____

_____, Register