

The State of Alabama, }  
Baldwin County

No. 219.

CIRCUIT COURT IN EQUITY

Sarah Elender Cook,

Complainant

vs.

Robert Cook,

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 on the part of Robert Cook toward Sarah Elender Cook,

It is further ordered, that the said Sarah Elender Cook be, and s 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 Sarah Elender Cook 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

Robert Cook

It is further ordered, adjudged and decreed that the said Sarah Ellender Cook shall not again marry except to said Robert Cook, 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 Robert Cook,

during the said pendency of appeal

It is further ordered and adjudged that Sarah Elelder Cook have

the care, custody and control of Wanedtah Cook a girl 7 years of age and Ismell Cook a boy 4 years of age, children born of this marriage, and

This 20th day of August 19 29

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 \_\_\_\_\_ 9\_\_\_\_, 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 \_\_\_\_\_, 19\_\_\_\_

Register

- DIVORCE -BILL OF -

STATE OF ALABAMA )  
COUNTY OF BALDWIN )

SARAH ELENDRER COOK, )  
Complainant )  
VS )  
\_\_\_\_\_  
ROBERT COOK, )  
Respondent )

IN THE CHANCERY DIVISION  
CIRCUIT COURT, BALDWIN COUNTY,  
ALABAMA ~~IN~~-----IN EQUITY.

BEFORE THE HONORABLE FRANCES M. HARE, JUDGE OF  
THE CIRCUIT COURT, BALDWIN COUNTY - IN EQUITY.

Your Complainant, SARAH ELENDRER COOK, a resident of Baldwin County, Alabama, over the age of Twenty-one (21), respectfully shows unto Your Honor, that about the yeat of 1918, the Complainant intermarried with \_\_\_\_\_ ROBERT COOK, ~~XX~~  
~~the town of Mobile~~, in the Town of Mobile, County of Mobile, and State of Alabama, and that they lived together for several years as man and wife, most of the time residing in Baldwin County, Alabama, and Complainant has been a bona fide resident of Baldwin County for more than three years.

~~TWO~~ That after the marriage of the Complainant and Respondent, that the Respondent, \_\_\_\_\_ ROBERT COOK became addicted to the habit of getting drunk, and has continued that habit, and has in the course of time grown worse and worse, although your Complainant has made every effort, and has done all in her power to reform and live with the Respondent herein. Up until about the 10th of April, 1929 they lived together as man and wife, and at which time, and on several occasions prior cursed swore, and used vile and approbous words to this Complainant thereto; the last being the worst of all; The Respondent struck, beat, confused and brused her, making her body blue, black and sore, and seized a butcher knife and threatened to cut out her vitals, and threatened the life and health of this Complainant,

*All Amended  
on filing bill*

stating among other things that he would kill her, and on one occasion just previous to the separation, went over to Florida and got a load of whiskey, and when he saw that he was to be apprehended by the officers of the law, the Complainant was compelled to remain on the whiskey truck, while Respondent escaped arrest and capture.

THREE: Complainant further avers that the Respondent herein threatened her life if she did not sell whiskey for him, and that the doings and things committed by this said Respondent, her husband, ROBERT COOK, became so obnoxious that it was impossible to live with him longer, as to do so would mean probably the losing of her life.

FOUR. To the said marriage there were two children born, a girl, WANEDEAH COOK, age SIX years, and a boy, ISHAMEL COOK, age FOUR years.

FIVE: Your Complainant shows to Your Honorable Court that she has no separate estate sufficient for her maintenance and respectfully represents and shows to Your Honor that she is in dire need of money for the maintenance of herself, that she has no other than what she is able to secure by her daily labor, and because of the misconduct of the husband, your complainant respectfully asks that this court make an allowance pendente lite or temporary alimony during pendency of this suit in the amount of Twenty Five (\$25.) Dollars per month, for her use and benefit and Fifty (\$50) Dollars for Attorney's fee and that he be required to pay to the Clerk of the Circuit Court for the use and benefit of this Complainant, and for her attorney's fee, the amount of Seventy-Five (\$75) Dollars within Thirty(30) days after service of summons.

PRAYER FOR PROCESS

Wherefore premises considered, Complainant respectfully prays that ROBERT COOK, be made a party Defendant in this cause and that such order, decrees and publication

necessary, be made to perfect service on the above named

ROBERT COOK, and that he be required to demur, plead or answer within the time and under the penalties required by law, or that same be forever confessed.

PRAYER FOR RELIEF:

That upon the final hearing of this cause, Your Honor will grant unto your Complainant an absolute divorce from the said

ROBERT COOK.

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

*F. F. Nelson*

ATTORNEY FOR COMPLAINANT

FOOT NOTE: Defendant is required to answer allegation in the foregoing bill, paragraph one to five, inclusive, but not under oath. Answer under oath is hereby expressly waived.

*F. F. Nelson*

ATTORNEY FOR COMPLAINANT.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 819.

August

Term, 192 9

Sarah Elender Cook

, Complainant...

vs.

Robert Cook

, 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 F.F. Nelson,

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.

F. F. Nelson

Solicitor for Complainant.

The State of Alabama,  
Baldwin County.

No. 819 CIRCUIT COURT, IN EQUITY

*Sarah Elmer Cook* Complainant

vs.

*Robert Cook* Defendant

In this cause it appears to the *Register*  
that a Summons requiring the Defendant *Robert Cook*

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 *Robert Cook*  
was served upon *him* by the Sheriff of *Escambia* County, Alabama, on the  
*12th* day of *July* 19*29*

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 *F. F. Nelson*

*Att'y for Complainant*  
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 *Robert Cook*

This *19th* day of *August* 19*29* Defendant ... aforesaid.

*F. F. Nelson*  
Register.

8581 NOTE OF TESTIMONY

.. Sarah Elender Cook.....

vs.

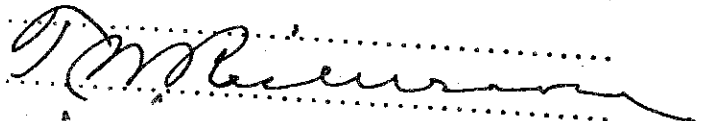
.. Robert Cook.....

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,  
service on Deft, decree pro confesso and testimony of  
Sarah Elender Cook and James Shipp,

and in behalf of Defendant upon



Register.

No. 819

Page

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

Sarah Elender Cook

VS.

Robert\* Cook

REQUEST FOR DECREE IN  
VACATION

FILED

Augst 19th,

192

9

Register

RECORDED IN RECORD

PAGE

Register



No. 819.

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Sarah Elender Cook

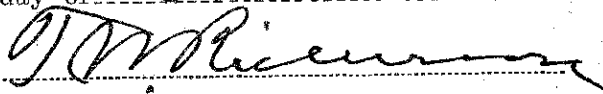
VS

Robert Cook

NOTE OF TESTIMONY

Filed in Open Court this 19th

day of August 192 9

  
Register

No. 819 Page \_\_\_\_\_

**The State of Alabama,**  
**Baldwin County**

**Circuit Court In Equity**

Sarah Elender Cook

vs.

Robert Cook

**Decree Pro Confesso On**  
**Personal Service.**

Issued Aug 19 1927

T. R. Riceman  
Register.

No. 819

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.  
Baldwin County, Ala.

Sarah Elender Cook

VS

Robert Cook.

DECREE OF DIVORCE

Filed in office this 22nd

day of August, 19 29.

T. M. Richardson  
Register.

E. O. M.

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

Sarah Ellender Cook ..... Complainant.

VS.

Robert Cook ..... Respondent.

I, T.W. Richerson .....

as Register and Commissioner .....

have called and caused to come before me Sarah Elender Cook and James Shipp, .....

witnesses named in the Requirement for Oral Examination, on the 19th day of August .....

1929, at the office of T. W. Richerson, 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:

Sarah Elender Cook, the complainant, after having been duly .....  
sworn, testified as follows: .....

..... My name is Sarah Elender Cook. I am the wife of Robert .....  
Cook. We are both over the age of twenty-one years. I have .....  
lived in Baldwin County for more than three years preceding the .....  
filing of this bill of complaint, in this cause. My husband drank .....  
whiskey, and stayed drunk nearly all the time. He cursed me con- .....  
tinually, publicly and privately, and before anybody and everybody. ....  
On various occasions he beat me. On one occasion on or about the .....  
last of March, or the First of April, 1929, my husband drew a knife .....  
on me and threatened to kill me. He was prevented from doing so .....  
by friends who were nearby, and I was compelled to run for my life. ....  
A short time before my baby was born, he seized me, beat me up, .....  
made my body black and blue, and started on me with a dirk knife, .....  
and threatened to cut out my vitals. On another occasion he compelled .....  
me to go to Pensacola with him, and he got a load of whiskey, and .....  
started to take it up to Monroe County. When the officers gave .....  
chase, he dodged out of the way, and let the Sheriff catch me with .....  
the whiskey. They had me in jail on his account, and when the .....  
officers found the truth of the thing, they turned me loose, and .....

put him in jail at Bay Minette, and Mr. Richerson, you remember the time. He plead guilty to the whiskey here. This has continued so long that I cannot live with him any longer, because if I do he will kill me, for he told me so, and it is only through good fortune of someone's being present that I am alive today. He told me before we separated that he would kill me, and I know that he will if I stay around him.

*Sarah Elender Cook*

James Shipp, a witness for the complainant, after having been duly sworn, testified as follows:

I know Sarah Elender Cook and Robert Cook. They are both over the age of twenty-one years. They have both been residents of Baldwin County for more than three years next preceeding the filing of the Bill of Complaint in this cause. I have visited in their home. I know of his quarreling and fussing with Mrs. Cook. On one occasion, after night, about eight-thirty or nine o'clock, I heard him cursing and abusing her, and threatening to kill her. I know that he was a regular bootlegger. On one occasion that I saw him, he had a pint of whiskey in each of his pockets. On another occasion at Johnston's Gas Station, Robert Cook and Edna Yates were talking, and he told Edna that if Sarah came down there that he was going to beat both of them, Edna and Sarah, and kick them out.

*James Shipp*

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 and read over to them and they signed the same in the presense of myself and Hon. F.F. Nelson Atty for Complaint, at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness<sup>es</sup> or had proof made before me of the identity of said witness<sup>es</sup>; 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 19th day of August 19229.

T W Richerson (L. S.)

NO. 819. PAGE

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Sarah Ellender Cook

vs. Complainant

Robert Cook

Respondent.

Oral Deposition

Filed August 19th, 19229

T W Richerson, Register.

Recorded in

Record

Vol. Page

Register