

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

Lee Andrew Brown Complainant

VS.

Mary A Brown Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on ..... and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complaint 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 that the said Lee Andrew Brown

is forever divorced from the said Mary A Brown

for and on account of the voluntary abandonment by the said Mary A Brown of the said Lee Andrew Brown

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

Lee Andrew Brown be and she is

It is further ordered that ~~the Complainant and Respondent be~~ and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Mary A Brown the ..... pay the cost herein to be taxed, for which execution may issue.

This 1st day of October, 1927

John D. Leigh

Judge Circuit Court in Equity.

I, Alice J. Duck, Register of the Circuit

Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the 26th day of November, 1926

Alice J. Duck  
Register of Circuit Court, in Equity

# The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

Lee Andrew Brown Complainant

VS.

Mary A Brown Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on

and Testimony as noted by the Register, and upon consideration thereof, the Court is of the 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 that the said

Lee Andrew Brown

is forever divorced from the said

Mary A Brown  
for and on account of the voluntary abandonment by the  
said Mary A Brown of the said  
Lee Andrew Brown

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that Lee Andrew Brown  
be, and she is hereby permitted to again contract marriage, upon the payment of the cost of this suit.

It is further ordered that Mary A Brown  
the 1st pay the cost herein to be taxed, for which execution may issue.

This 1st day of October 1927  
John D. Leigh  
Judge Circuit Court, in Equity.

I, \_\_\_\_\_ Register of the Circuit  
Court for \_\_\_\_\_ County, Alabama, do hereby certify that the foregoing is a  
correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which  
said decree is on file and enrolled in my office.

Witness my hand and seal this the \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_

Register of Circuit Court, in Equity.

No. 21 Page 1

**The State of Alabama**

Baldwin County.

IN CIRCUIT COURT, IN EQUITY

Lee Andrew Brown

vs. Complainant,

Mary A Brown

Respondent.

**DIVORCE DECREE**

Filed Oct 3rd 1927.

D. H. Pritchard

Register

Lee Andrew Brown

Complainant.

Circuit Court of Baldwin County, Alabama.

vs.

In Equity.

Mary A. Brown, Defendant.

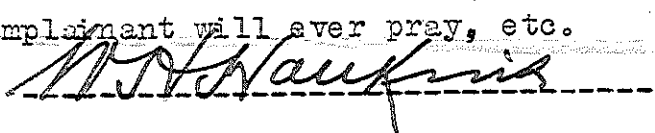
To the Honorable John. D. Leigh, Judge of the 21st. Judicial Circuit:  
Complainant, Lee Andrew Brown shows unto your Honor that he is a resident of Baldwin County, Alabama, and is over the age of 21 years; that Mary A. Brown the defendant is a resident of Baldwin County, Alabama, and is over the age of 21 years.

Your complainant shows unto your Honor that he has been a bona fide resident of the State of Alabama for three years next preceding the filing of this bill of complaint; that your complainant and defendant were married on or about August 24, 1924, in Baldwin County, Alabama, and ever since have been and now are, husband and wife.

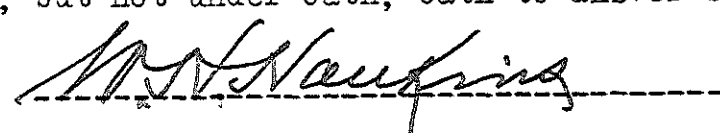
That on or about October 22, 1924, the defendant, Mary A. Brown voluntarily abandoned the bed and board of your complainant, and that said voluntary abandonment has been continuous for a period of more than two years next preceding the filing of the bill of complaint; that said abandonment was without cause, fault or consent upon the part of your complainant, but was wholly the fault of defendant, Mary. A. Brown. That said abandonment occurred in Baldwin County, Alabama.

Complainant prays that the bonds of matrimony between himself and defendant Mary A. Brown be dissolved and that he be allowed to marry again.

Your complainant also prays your Honor to grant to him all legal and appropriate process and that the same be directed to the said Mary A. Brown to ~~xxx~~ plead, answer or demur to said bill of complaint within 30 days or a decree pro confesso be taken against her, and that your Honor will grant unto your complainant such other, further and different relief as may seem right and proper, and complainant will ever pray, etc.

  
Solicitor for Complainant.

Foot Note--The defendant is hereby required to answer each and every part of said bill of complaint, but not under oath, oath to answer being expressly waived.

  
Solicitor 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 Mary A. Brown,

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

Lee Andrew Brown,

against said

Mary A. Brown,

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 29th, day of

April 1927.

*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

*676*

Circuit Court of Baldwin County  
In Equity.

No.

SUMMONS

Lee Andrew Brown,

vs.

Mary A. Brown.

*at Dick Padgett*  
*near Hotel*

W. H. Hawkins,

Solicitor for Complainant

Recorded in Vol

Page

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this *29th*,

day of *April* 192 *7*.

Sheriff.

Executed this *10* day of

*August* 192 *7*  
by leaving a copy of the within Summons with

*Mary Agooa Brown*  
Defendant.

*L. Brown*  
Sheriff.

By *J. O. Chambliss*  
Deputy Sheriff.

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

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

Lee Andrew Brown

Complainant.

VS.

Mary A. Brown

Respondent.

I, T.W. Richerson,

as Register and Commissioner

have called and caused to come before me Lee Andrew Brown, W.T. Brown and

Levi Jackson,

witnesses named in the Requirement for Oral Examination, on the 1st day of October

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:

Lee Andrew Brown the Complainant who being duly sworn testified

as follows:- My Name is Lee Andrew Brown, I am the complainant

in this cause, and am over the age of 21 years, and reside at Lottie,

Baldwin County Alabama, I am a bon a fide resident of the State of

Alabama all my life, and a bon a fide resident of Baldwin County

for 2 years next preceding the filing of this bill in this cause,

The Defendant Mary A. Brown, is a resident of Baldwin County, Alabama,

and is over the age of 21 years. Mary A. Brown the defendant and I

were married in Baldwin County, Alabama, on August 24th, 1924,

On October 22nd, 1924, Mary A. Brown the defendant voluntarily

abandoned the bed and board of your Complainant, and this voluntary

abandonment has been continuous for a period of more than 2 years

next preceding the filing of the bill of complaint.

She abandoned me voluntarily and without cause, fault, or consent on

my part, but it was wholly her fault. This Abandonment occurred in Baldwin County Alabama,

Lee Andrew Brown

W.T. Brown, a witness for Complainant. who being duly sworn testified as follows:- My Names is W.T. Brown, I know Lee Andrew Brown and Mary A. Brown, both Lee Andrew Brown and Mary A. Brown are over the age of 21 years, Lee Andrew Brown has been a bon afide resident of the State of Alabama, all his life and has resided in Baldwin County, more than 3 years next preceding the filing of this bill. I know about when Lee Andrew Brown and Mary A. Brown were married, the date of their marriage was about August 24th, 1924, and they were married in Baldwin County Alabama, I know about the time that Lee Andrew Brown and Mary A. Brown separated, it was about Oct 22nd, 1924. I know that Mary A. Brown, voluntarily abandoned Lee Andrew Brown her husband and that Mary A. Brown, and Lee Andrew Brown has never lived together as man and wife since said separation, I know that the separation was not caused in anyway by the fault of Lee Andrew Brown. Said abandonment occurred in Baldwin County Alabama. and was a voluntary act on her part.

W. T. Brown

Levi Jackson a witness for Complainant who being duly sworn testified as follows:-

I know Lee Andrew Brown, and Mary A. Brown both are over the age of 21 years, I know that they were married about 3 years ago, and they separated about 1 month after they were married, they have not lived together since the separation.

Levi Jackson



ORAL EXAMINATION.

I, T. 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 ES and read over to them and they signed the same in the presense of myself and W. H. Hawkins 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 1st day of Oct 192 7

T. W. Richardson (L. S.)

NO. 676 PAGE

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Leo Andrew Brown

vs. Complainant

Harry A. Brown

Respondent.

Oral Deposition

Filed Oct 1st, 192 7.

T. W. Richardson, Register.  
Recorded in

Vol. Page Record

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

Mary A. Brown

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

Lee Andrew Brown

against said

Mary Brown,

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 29th day of April

1927.

*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. 675 CIRCUIT COURT IN EQUITY.

Lee Andrew Brown,

Complainant....

vs.

Mary A. Brown,

Defendant....

Motion is hereby made for a Decree Pro Confesso against Mary A. Brown

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..... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 26 day of September 1927

W. A. Hawkins,

Solicitor.

8581 NOTE OF TESTIMONY

Lee Andrew Brown

vs.

Mary A. Brown,

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.....  
Lee Andrew Brown, W. F. Brown and Levi Jackson,.....

and in behalf of Defendant upon.....

*T. W. Robinson*

Register.

The State of Alabama, }  
Baldwin County.

No. 676

CIRCUIT COURT, IN EQUITY

Lee Andrew Brown

Complainant

vs.

Mary A. Brown

Defendant

In this cause it appears to the

Register

that a Summons requiring the Defendant

Mary A. Brown,

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

Mary A. Brown

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

20th

day of

August

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. H. Hawkins,

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

Mary A. Brown,

Defendant aforesaid.

This 26th day of

Sept

1927



Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 676.

Vacation

Term, 1927

Lee Andrew Brown

, Complainant...

vs.

Mary A. Brown,

, 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 W.H. Hawkins,

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  
Solicitor for Complainant.

No. 676

Page.....

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

Lee Andrew Brown

VS.

Mary A. Brown

REQUEST FOR DECREE IN  
VACATION

FILED Oct 1st 1927

*T. W. Richardson*  
Register

RECORDED

RECORDED IN ..... RECORD

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Register

672

IN THE CIRCUIT COURT, Baldwin COUNTY, IN EQUITY.

Lee Monroe

Complainant.

vs.

Ida May Monroe,

Respondent.

I, T.W. Richerson,

Register,

as

have called and caused to come before me Angelina Hawkins, Lee Monroe,

witnesses named in the Requirement for Oral Examination, on the 18 day of April,  
1928, 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:

## TESTIMONY OF LEE MONROE.

My name is Lee Monroe; I am over the age of twenty one years  
 and a resident citizen of Baldwin County, Alabama, having resided in  
 said County for more than three years next preceeding the filing of  
 this bill.

That Ida Mae Monroe is over the age of twenty one years and  
 her place of residence cannot be ascertained after reasonable diligence.  
 Ida Mae Monroe and I were lawfully married in the year 1918 and lived  
 together as husband and wife until the year 1920 at which time the said  
 Ida Mae Monroe voluntarily abandoned the bed and board of Lee Monroe,  
 without just cause or without fault on his part; That they have not lived  
 together since that time. Said act/ of abandonment was committed in Baldwin County,  
 Alabama.

Subscribed and sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_.

REGISTER.



TESTIMONY OF ANGELINE HAWKINS.

My name is Angeline Hawkins; I am over the age of twenty one years and a resident of Hurricane, Baldwin County, Alabama, having resided there for more than three years next preceeding the filing of said bill.

I am personally acquainted with Lee Monroe and Ida Mae Monroe; I know of my own knowledge that Lee Monroe and Ida Mae Monroe were married in the year 1918 and lived together as husband and wife until the year 1920, at which time the said Ida Mae Monroe voluntarily abandoned the bed and board of the said Lee Monroe, and I know of my own personal knowledge that they have not lived together since that time. Said act/was committed in Baldwin County, Alabama.

Dated this 18th., day of April, 1928.

Angeline Hawkins

Subscribed and sworn to before me

this \_\_\_\_\_ day of \_\_\_\_\_, 1928.

ORAL EXAMINATION.

I, T. W. Richerson,, as \_\_\_\_\_,  
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, ,  
at the time and place herein mentioned; that I have personal knowledge of the personal identity of said wit-  
ness...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 in 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... 18th day of April, 1928

T. W. Richerson (L. S.)

No. .... Page .....

The State of Alabama

County .....

IN CIRCUIT COURT, IN EQUITY.

See memo

vs. Complainant,

Spencer Henry Lawrence

Respondent.

ORAL DEPOSITION.

Filed April 18, 1928

Spencer Henry Lawrence, Register.

Recorded in

Record

Vol. .... Page .....

Register.

STATE OF ALABAMA,  
BALDWIN COUNTY.

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

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

Your Orator, Lee Monroe, respectfully represents and shows  
unto your Honor as follows:-

FIRST:

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

That Ida Mae Monroe's Post office address is unknown and  
cannot be ascertained after diligent search and inquiry; that she is  
over the age of twenty one years.

SECOND:

That Your Orator and the said Ida Mae Monroe were lawfully  
married on to-wit:- in the year 1918; that they lived together as husband  
and wife until to-wit<sup>d</sup> the year 1920, at which time the said Ida Mae Monroe  
voluntarily abandoned the bed and board of your Orator without just cause  
or without fault on the part of the said Lee Monroe; that they have not lived  
together since. Said act was committed in Baldwin County, Alabama.

PRAYER FOR PROCESS.

~~THE PREMISES CONSIDERED~~, Your orator respectfully prays that the  
said Court will take jurisdiction of the cause made by this bill of complaint  
and by appropriate process be required to plead to, answer or demur 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  
Ida Mae Monroe and that she be required to 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 Orator an absolute divorce from the said Ida Mae Monroe.

That if Your Orator is mistaken in the relief prayed for then Your Honor will grant unto him such other, wrighter, different and general relief as he in justice and equity may be entitled, he 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 three, inclusive, but not under oath, Answer under oath is hereby expressly waived.

HENRY D. MOORER,  
Attorney for Complainant.

STATE OF ALABAMA,

BALDWIN COUNTY.

Before me, Gladys Bush, a Notary Public in and for said County in said State, personally appeared Lee Monroe who being by me first duly and legally sworn doth depose and say:- That the allegations contained in the foregoing bill are true and correct.

Subscribed and sworn to before me  
this 25th day of April, 1927.

Gladys Bush  
Notary Public, Baldwin County, Alabama.

Lee Monroe

NOTICE TO NON-RESIDENT.

MOORE PTG. CO BAY MINETTE

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

This the 20 day of  
May 192

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

that the Defendant

is a non-resident of the State of Alabama whose post office address is unknown  
and cannot be ascertained after diligent inquiry.

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,  
Bay Minette

, a newspaper published in  
Baldwin County, Alabama, once a week for four consecutive weeks, requiring  
the said

to answer or demur to the Bill of Complaint in this cause by the 11th  
June 1927, or after thirty days therefrom a decree Pro Confesso may  
be taken against

T. W. Richardson, Register.

Attorneys for Plaintiff.

8581 NOTE OF TESTIMONY

Lee Monroe.....

.....

.....

vs.

Ida May Monroe.....

.....

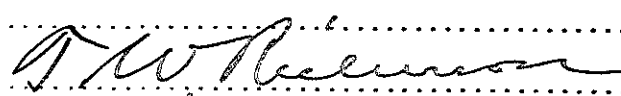
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THE STATE OF ALABAMA,  
BALDWIN COUNTY

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 Lee Monroe and Angelina  
Hawkins.....

and in behalf of Defendant upon.....

  
Register.

2  
No. 677.

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Lee Monroe

VS

Ida May Monroe

NOTE OF TESTIMONY

Filed in Open Court this 19th  
day of April 1928.

*J. M. Richardson*  
Register

MOORE PTG CO

RECORDED

The State of Alabama,  
Baldwin County.

{ No. 677

Circuit Court, in Equity.

Lee Monroe

Complainant.

vs.

Ida May Monroe,

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.

Voluntary abandonment,

It further ordered, that the said Lee Monroe be, and 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 Lee Monroe, 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 Ida May Monroe,

It is further ordered, adjudged and decreed that said Lee Monroe shall not again marry except to said Ida May Monroe, until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Ida May Monroe, during the said pendency of appeal

This 19th day of April 1928

John D. Leigh  
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