

No. 833.

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

Margeret Sanford

vs

William A. Sanford.

DECREE OF DIVORCE

Filed in office this 12th

day of October, 1929.

D. W. Pickens
Register.

E. O. M. _____

MARGARET SANFORD,
Plaintiff,
-vs-
William A. Sanford,
Defendant.

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

BILL FOR DIVORCE.

PART ONE.

To the Honorable F. W. Hare, Judge of the Circuit Court of Baldwin County, Alabama, in Chancery sitting:

PART TWO.

Your Oratrix, Margaret Sanford, a resident of Baldwin County, Alabama, and over twenty-one years of age, respectfully exhibits this her Bill of Complaint against William A. Sanford, also over the age of twenty-one years, and whose place of residence is unknown to your Oratrix, but who is a non-resident of the State of Alabama.

PART THREE.

For complaint against said defendant your Oratrix represents as follows:

1: That your Oratrix and said defendant were legally married on the 14th day of February, 1925, at Worcester, Massachusetts.

2: That for more than three years next preceeding the filing of this Bill, she has been a bona fide resident of Baldwin County, Alabama, residing near Miflin therein, with the intention of making her permanent residence therein.

3: That on or about the first day of June, 1927, the defendant wilfully and wantonly deserted your Oratrix and separated from her and left her for parts unknown to her and for more than two years last past has been separated from her and has contributed nothing to her support during said time and his whereabouts are unknown to her, wherefore your Oratrix alleges that the

said defendant has been guilty of voluntary abandonment for more than two years next preceeding the filing of this bill and that by reason thereof she is entitled to a divorce from the defendant.

PART FOUR.

That the issue of the marriage between your Oratrix and said defendant is one daughter, Francis Sanford, aged three years, and that your Oratrix is and defendant is not, a fit and proper person to have the care, custody and control of said minor child, and that it would be for the best interests of said child that the custody and control thereof be granted to your Oratrix.

APRT FIVE.

WHEREFORE, your Oratrix prays that she may be granted an absolute divorce from the defendant; that she may be granted the exclusive care, custody and control of Francis Sanford, the minor child of the parties, and that she may have such other and further relief in the premises as may be just and equitable.

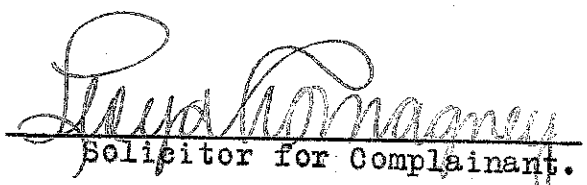
PART SIX.

And your Oratrix does further pray that your Honor direct that the Register of this Court make out and superintend the appropriate order of publication to the non-resident defendant William A. Sanford, commanding him to appear within thirty days after the period specified in the order of publication, then and there to answer all and singular the premises and to stand by and abide such order and decree therein as to this Honorable Court shall seem meet; and your Oratrix will ever pray, &c.


Solicitor for Complainant.

FOOT NOTE.

The defendant William A. Sanford is hereby required to answer the allegations of Part Three, paragraphs numbered 1, 2 and 3 and Part Four of this bill, but not under oath, oath to said answer being expressly waived.


Solicitor for Complainant.

STATE OF ALABAMA)
)
COUNTY OF BALDWIN.)

Margaret Sanford, being first duly sworn, on her oath deposes and says that she is the plaintiff in the above entitled cause, that she has read the foregoing bill and knows the contents thereof, and that the facts therein set forth are true. And affiant further says that the defendant William A. Sanford is over the age of twenty-one years and is a non-resident of the State of Alabama, but that she does not know and after diligent search and inquiry cannot ascertain, his present whereabouts and place of residence and that service upon said defendant by publication will be necessary in this cause.

Margaret Sanford

Subscribed in my presence and sworn to before me, this
29th day of July, 1929.

Levin A. Maguire
Notary Public.

MARGARET SANFORD,
Plaintiff,

-vs-

WILLIAM A. SANFORD,
Defendant.

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

DEPOSITION.

STATE OF ALABAMA,)
County of Baldwin.)

I, T. W. Richerson, as Register and Commissioner, have called and caused to come before me, Margaret Sanford and Susie Slavick, witnesses named in the Requirement for Oral Examination, on the 9th day of October, 1929, at my office in the Court House, Bay Minette, Alabama, and having first sworn said witnesses to speak the truth, the whole truth and nothing but the truth, the said Margaret Sanford doth depose and say as follows:

My name is Margaret Sanford; I am the plaintiff in this action for divorce against William A. Sanford and was married to him in Worcester, Massachusetts on February 14th, 1925. We lived together there until after my baby, Francis Sanford, was born, which was in March, 1926. The baby did not do well and when she was three months old my husband and I decided that I should take my baby and go home to my mother's for a visit and to see if the baby would do better in the country. My father and mother have lived in Baldwin County, Alabama, near Mifflin, for about thirteen years. My husband, the defendant, was supposed to work and send us money to live on and come home on, but after I had been here a few ~~months~~ ^{weeks} the baby improved so that we decided my husband should come here also, as my father had a farm he was willing to give us the use of and as my husband could not make enough money up north to keep us anyway.

He came to Baldwin County about the first of July, 1926, but he did not care to farm, in fact did not seem to care to work at all, and my folks had to support all of us. He went to Pensacola and got a job there but only kept it a short while when he decided to go back north and get work and to send for the baby and me when he got a job.

was supposed to go to work there and send for his wife and baby, at least that is what he said he was going to do, but he never did send for them. He kept writing to her trying to get her to borrow money from her father but her father could not lend them any and he never even wrote another letter after she told him she could not borrow the money. He has not written to her for more than two years and has not lived with her or sent her any money for herself or the baby for two and a half years. He never did intend to send for her at all, I think, but just ran off and left her with the baby to take care of. I do not know where he is and my daughter does not know either.

She never gave him any cause to leave her but was always a good wife and a good mother to the baby and she has always taken good care of the baby.

Suse Slavick

I, T. W. Richerson, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down in writing under my direction and was read over to the witnesses Margaret Sanford and Susie Slavick who signed the same in my presence at the time and place herein mentioned; that I have personal knowledge of the identity of said witnesses; that I am not of counsel or of kin to any of the parties to this cause, or in any manner interested in the result thereof.

Given under my hand and seal this 9th day of October, 1929.

T. W. Richerson
Register

He never did send for us. He wrote me a few letters, trying to get me to borrow money from my parents but when I told him that they were not willing to lend us any money, he quit writing altogether and I have not heard from him at/^{all}since. The last I heard from him was in June, 1927 and he has not even written a letter to me since that time. He has abandoned the baby and me and has not provided one cent for our support for more than three years and I do not now know where he is nor anything at all about him. He never did support us and always drank so that practically all he could earn was spent for liquor, and it has been more than two years since he left me and we have not lived together since. I was always as good a wife to him as I could be and gave him no cause at all to leave me and the baby.

I have been a resident of Baldwin County, Alabama, since June 1926 and for more than three years before filing this bill for divorce, and it is my intention to make Baldwin County, Alabama, my permanent home. I am able to support and educate my baby Francis Sanford, and desire that the Court give me the exclusive custody of her, as her father, the defendant, is not a fit person to have the care and custody of any child.

Margaret Sanford

SUSIE SLAVICK.

My name is Susie Slavick and I am the mother of Margaret Sanford the complainant in this divorce action. I have lived at Mifflin, Baldwin County, Alabama, for about thirteen years continuously, and in the spring of 1926 my daughter came home with her baby for a visit. Her husband, the defendant William A. Sanford, remained up north and was supposed to send and get her and the baby, but a few weeks later he came to our home instead. This was about July 1st, 1926. They lived with us and my husband gave him the use of a farm, and helped him in every way he could, but he did not care about farming and soon gave it up. He laid around and my husband and I had to feed them as he wouldn't work and had no money. After a while he got a job over in Pensacola, but only kept it a little while and then he went back north. He

Deposition in case
of Margeret Sanford

vs.

William Sanford.

Filed October 9th 1929

T. M. McIlwain
-----Register

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MARGARET SANFORD,
Plaintiff,

-vs-

William A. Sanford,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN CHANCERY.
copy
BILL FOR DIVORCE.

PART ONE.

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said defendant has been guilty of voluntary abandonment for more than two years next preceeding the filing of this bill and that by reason thereof she is entitled to a divorce from the defendant.

PART FOUR.

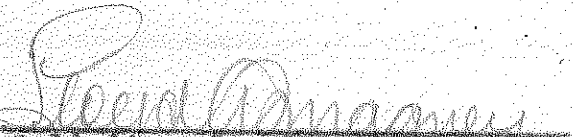
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Solicitor for Complainant.

FOOT NOTE.

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Solicitor for Complainant.

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Margaret Sanford

Subscribed in my presence and sworn to before me, this
29th day of July, 1929.

Seal

Lawrence Maguire
Notary Public.

NO. _____.

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

MARGARET SANFORD,

Plaintiff,

-vs-

WILLIAM A. SANFORD,

Defendant.

copy

BILL FOR DIVORCE.

Filed July 30/1929
J. W. [Signature]
Register

Lloyd A. Magney,
Solicitor for Plaintiff

8581 NOTE OF TESTIMONY

Margeret Sanford

vs.

William A. Sanford

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 Margeret Sanford

and Susie Slavick,

and in behalf of Defendant upon

T. W. Richerson
Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 833. October Term, 192 9

Margeret Sanford, Complainant

vs.

William A. Sanford, 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 Hon. Lloyd A. Magney

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.

Lloyd A. Magney
Solicitor for Complainant.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Margeret Sanford

vs.

William A. Sanford.

REQUEST FOR DECREE IN
VACATION

FILED October 9th 1929

J. W. Rice
Register

CORDED IN RECORD

..... PAGE

Register

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Margeret Sanford

vs

William A. Sanford.

NOTE OF TESTIMONY

Filed in Open Court this 9th

day of October 1929

J. W. Rice
Register