

837

Vivian S. Green.....

.....

.....

vs.

Willie Warren Green

.....

.....

.....

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 Vivian S. Green and Ed. J. Green

.....

.....

.....

.....

.....

.....

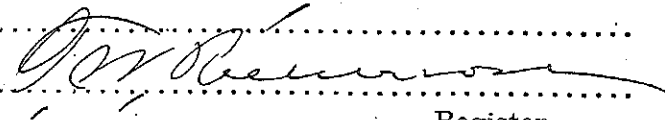
and in behalf of Defendant upon.....

.....

.....

.....

.....



Register.

2

No. 837

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Vivi an S : Green vs &

vs

Willie Mauren Green

NOTE OF TESTIMONY

Filed in Open Court this 15th

day of August 1929

[Handwritten Signature]

Register

The State of Alabama, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 1785 Term, 192...

Vivian S Green

Complainants

vs.

Willie Warren Green

Defendants

Motion is hereby made for a Decree Pro Confesso against

Willie Warren Green

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 24 day of June 1929

Beebe Hall

Solicitor.

2

RECORDED

No. 785-

Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Livian S. Green

Complainants.

vs.

Hilda Warren Green

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed *June 24th* 192*9*

D. McInnis

Register.

Recorded in Record,

Vol. Page

Register.

Baldwin Times Print, Bay Minette.

The State of Alabama, } No. 337 CIRCUIT COURT IN EQUITY
Baldwin County }

Vivian S. Green Complainant

vs.

Willie Warren Green 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 on account of voluntary abandonment,

It is further ordered, that the said Vivian S. Green 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 Vivian S. Green 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 Willie Warren Green

It is further ordered, adjudged and decreed that the said Vivian S. Green shall not again marry except to said Willie Warren Green 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 Willie Warren Green during the said pendency of appeal

This 17th 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

ms

No. 887

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

Vivian S. Green

vs

Willie Warren Green

DECREE OF DIVORCE

Filed in office this

17th

day of August, 19 29.

J. M. Richardson

Register.

E. O. M.

RECORDED

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. *837*

Term, 192

Vivian S Green

, Complainant.

vs.

William Warren Green

, Defendant.

To *F. W. Richardson*

, 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 *Beebe Hall*

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.

Beebe Hall

Solicitor for Complainant.

No. 837 Page 1st

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Vivian Green

vs.

Willie Marie Green

REQUEST FOR DECREE IN
VACATION

FILED Aug 15 1929
J. W. McCreary
Register

RECORDED IN _____ RECORD

VOL. _____ PAGE _____

Register

The State of Alabama,
Baldwin County.

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

VIVIAN S. GREEN Complainant.

VS.

WILLIE WARREN GREEN Respondent.

I. E. W. Richerson,

as Register and Commissioner

have called and caused to come before me Vivian S. Green and Ed. I. Green.

witnesses named in the Requirement for Oral Examination, on the 5th day of July,

1929, at the office of I. E. W. Richerson,

in Bay Minette, Alabama, and having first sworn said witness(es) to speak the

truth, the whole truth, and nothing but the truth, the said Vivian S. Green

doth depose and say as follows:

My name is Vivian S. Green, I am over the age of twenty-one years and reside at Bay Minette, Baldwin County, Alabama, I have resided in the State of Alabama all of my life; that Willie Warren Green, Defendant in that certain case pending in the Circuit Court of Baldwin County, Alabama, in equity, wherein I am Complainant and Willie Warren Green is Defendant, for divorce, is over the age of twenty-one years, and a resident of Magnolia, Arkansas, his Post Office address is Magnolia, Arkansas, the said Defendant and I are husband and wife, we were married at Flomaton, Alabama, December 10, 1916, we lived together as husband and wife until October 20, 1926, when he, without cause or provocation voluntarily abandoned me at Flomaton, Alabama. We have not lived together as husband and wife since the said date. We have no children. The Defendant owns forty acres of land in Escambia County, Alabama, described as the Northwest quarter of the Southeast quarter of Section three, Township one North, Range eight East. This property is worth about two thousand dollars, it rents for one hundred dollars a year. I have no property and have no trade or profession and I am compelled to earn a living at house keeping and other menial work. I am unable from such labor to earn more than twenty dollars

a month. This is insufficient to properly feed and clothe me. The Defendant is thirty-five years of age and is in good health and earns and makes a good living. He does not contribute to my support.

x. Mrs. Vivian S. Green

Sworn to and subscribed before me on this the 5th. day of July, 1929.

T. W. Ricumson, Register

Witness Green testified as follows:

My name is Ed. J. Green, I reside at Bay Minette, Alabama, I have known for more than three years, Vivian S. Green, Complainant in that certain cause pending in the Circuit Court of Baldwin County, Alabama, in equity, against Willie Warren Green, for divorce. She has lived continuously during the whole of the time that I have known her in the State of Alabama; she is over the age of twenty-one years and a resident of Bay Minette, Baldwin County, Alabama. On October 20th., 1926, the Defendant voluntarily abandoned her at Flomaton, Alabama, and at no time since the said date have they lived together as husband and wife. Mrs. Green is a hard working, conscientious woman. She has no means of support other than her own labor, and she is not able to make more than twenty dollars a month, which is insufficient to properly feed and clothe her.

Ed J Green

Sworn to and subscribed before me on this the 5th. day of July, 1929.

T. W. Ricumson, Register

ORAL EXAMINATION.

I, T. W. Williamson, 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 witnesses and read over to them and they signed the same in the presence of myself And Hon. W. O. Beebe, Atty. for Complainant at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses... or had proof made before me of the identity of said witness...; 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 6 day of July, 1929.
T. W. Williamson (L. S.)

No. 785 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

W. Warren Green

vs. Complainant

W. Warren Green

Respondent.

Oral Deposition

Filed July 5th, 1929

T. W. Williamson, Register.

Recorded in

Record

Vol. _____ Page _____

Register

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

Comes Vivian S. Green and humbly complaining against Willie
Warren Green respectfully shows unto your Honor as follows:

FIRST:

That your complainant is over the age of twenty-one years
and a resident of Baldwin County, Alabama; that she has been continuous
during the three years next preceding the filing of this bill of
complaint a resident of the State of Alabama, that she has resided
in Baldwin County, Alabama, for more than two years next preceding
the filing of this bill of complaint; that the said Willie Warren
Green, defendant, is over the age of twenty-one years, a resident
of Magnolia, Arkansas, his Post Office address being Magnolia, Arkansas.

SECOND:

That your Complainant and the said Defendant are husband and
wife, that they intermarried at Flomaton, Alabama, on to-wit, December
10, 1916; that they lived together as man and wife until October 20,
1926, when the said Defendant on to-wit, October 20, 1926, without
cause or provocation voluntarily abandoned your complainant at
Flomaton, Alabama, and that they have not lived together as husband
and wife since the said date.

THIRD:

Complainant further shows that there were no children of
said marriage; that complainant owns no property, real or personal,
that she has no trade or profession and is compelled to earn her
living at odd jobs of house keeping and other menial work; that
she is unable to make by such labor sufficient money to properly
maintain and support herself; that she is without means to employ
counsel to prosecute this action; that the Defendant owns a forty
acre tract of land near Flomaton, Alabama, described as the Northwest

quarter of the Southwest quarter of Section three, Township one North, Range eight East, in Escambia County, Alabama, that the said property is worth fifteen hundred to two thousand dollars.

Wherefore your Complaint prays this honorable court will take jurisdiction of the cause made by this bill of complaint; that by due and proper process the said Willie Warren Green be made a party Defendant to this bill of complaint within the time and under the usual penalties prescribed by law and the practice of this Honorable court; that all necessary and proper steps be taken to the end that a suitable alimony pending this suit be allowed her and a suitable sum be allowed her attorneys for the prosecution of this suit; that an appropriate process be issued to establish a lien on the aforesaid land of the Defendant for the satisfaction of the said alimony and attorneys fee; that upon the final hearing of this cause the bonds of matrimony be forever dissolved between this complainant and the said defendant and that a suitable alimony be allowed to this complainant and that the aforesaid lands be sold to the satisfaction of the same.

Willie W. Green
Beebe & Hall
Attorneys for Complainant.

FOOT NOTE:

The defendant is required to answer each and every allegation in the foregoing bill of complaint numbered first to third, both inclusive, but not under oath, oath being hereby expressly waived..

Beebe & Hall
Attorneys for Complainant.

STATE OF ALABAMA)
BALDWIN COUNTY)

Before me the undersigned Notary Public in and for said State and County this day personally appeared Vivian S. Green who is known to me and who being by me first duly sworn deposes and says that she is the Complainant named in the foregoing bill of complaint against Willie Warren Green that she has read and knows the facts alleged in the said bill of complaint and the same are true.

Vivian S. Green

Sworn to and subscribed before me on this the 6th day of April, 1929.

Eloise DeLoach
Notary Public,
Baldwin County, Alabama.