

The State of Alabama, }  
Baldwin County

No. 849

CIRCUIT COURT IN EQUITY

Travis Presley

Complainant

vs.

Grace Presley

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 Pregnancy of defendant before marriage,

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

It is further ordered, that the said Travis Presley be, and \_\_\_\_\_ 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 Travis Presley 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 Grace Presley

It is further ordered, adjudged and decreed that the said Travis Presley shall not again marry except to said Grace Presley until sixty days after this date, and that if an appeal is taken within sixty days \_\_\_\_\_ he shall not marry again except to said Grace Presley \_\_\_\_\_ during the said pendency of appeal

This 5<sup>th</sup> day of Febuary 1930

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

849

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

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon

Grace Presley,

Mc Cullough, Escambia Co, Ala.

of Escambia 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

Travis Presley,

against said

Grace Presley,

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 22nd day of October, 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: 849

CIRCUIT COURT, IN EQUITY

*Travis Presley*

Complainant

vs.

*Grace Presley*

Defendant

In this cause it appears to the *Register, J. W. Richerson*  
that a Summons requiring the Defendant

*Grace Presley*

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 *Grace Presley*  
was served upon *her* by the Sheriff of *Escambia* County, Alabama, on the  
*28th* day of *October* 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. J. Horn, Attorney*  
*for Plaintiff*

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

*Grace Presley*

Defendant aforesaid.

This *27* day of *December* 19*29*

*J. W. Richerson*

Register.

TRAVIS PRESLEY,  
COMPLAINANT,

VS:

GRACE PRESLEY,  
RESPONDENT.

\*  
+  
+  
+  
+  
+  
\*

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

To The Honorable Francis W. Hare, Judge of said Court:

Your orator, Travis Presley, respectfully represents unto  
Your Honor as follows:

1. That he is a resident citizen of Baldwin County, Alabama and has so resided for more than three years next preceding the filing of this bill of complaint; that Grace Presley is a resident citizen of Escambia County, Alabama, and that her postoffice address is McCullough, Alabama; that your orator is over the age of twenty-one years and that respondent is over the age of eighteen years.


2. That your orator and respondent were married at Lottie, Alabama on May 2, 1928 and lived together as husband and wife in Baldwin County, Alabama from that date until on or about the 15th day of July, 1928.

3. That on or about July 15, 1928 your orator discovered that the respondent was pregnant and her pregnancy was the result of illicit relations with some other man prior to the marriage between your orator and the respondent. That your orator had no knowledge of said pregnancy at time of marriage and that that condition was not brought about through his agency.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your orator prays that the said Grace Presley be made party respondent to this bill of complaint.

that the usual process of this court be issued and served on her, requiring her to answer, plead or demur to this bill of complaint within the time prescribed by law; that upon a final hearing of this cause, Your Honor will make and enter a decree dissolving the bonds of matrimony heretofore existing between your orator and respondent and permitting your orator to again contract marriage if he should so desire. And your orator prays such other further and general relief as in equity and good conscience he may be entitled to receive.

  
Solicitor for Complainant.

FOOT-NOTE: The respondent is required to answer each paragraph of the foregoing bill of complaint numbered one to three, both inclusive but answer thereto under oath is hereby expressly waived.

  
Solicitor for Complainant.

Address of respondent is McCullough, Alabama.

THE STATE OF ALABAMA:.....BALDWIN COUNTY

IN THE CIRCUIT COURT, IN EQUITY

Travis Presley,

Complainant

VS:

Grace Presley,

Respondent.

To C. W. Williams residing at Atmore, State of Alabama  
one or more to take depositions:

KNOW YE, that reposing confidence in your integrity,  
skill and ability, I have appointed you Commissioner to take the  
depositions on oral examination of Travis Presley,  
Hose Presley, E. D. Presley and W. S. Seals

material witnesses for the complainant in a cause now  
pending in the Circuit Court, in Equity, of said County, wherein  
Travis Presley is Complainant and Grace ~~Presley~~ is Respondent.  
And hereby authorize you to call and cause to come before you the  
said witnesses at such time and place as you shall appoint, and  
their depositions on oath to take, touching their knowledge of  
the matter in controversy, and the said depositions when so taken  
by you shall be subscribed by said witnesses and certified under  
your hand and seal, and with this commission shall be returned to  
me.

Witness my hand this 28<sup>th</sup> day of Jan, 1930.

D. H. Richardson, REGISTER

Filed Jan 28/1900

J. W. McIlwain  
Register

Original Bill

Travis Bradley  
vs  
Grace Bradley

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Filed October 22<sup>nd</sup> / 1929  
T. W. Piccannon  
Register

Hon. F. G. Horan  
Clerk for Comptroller

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10/22/29



No. 849

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

**Circuit Court In Equity**

*Travis Presley*

vs.

*Grace Presley*

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

Issued December 23 1929

*D. M. [Signature]*

Register.

Original

SERVE ON.....

Circuit Court of Baldwin County  
In Equity.

No. ....

SUMMONS

Travis Presley

vs.

Grace Presley.

*M. C. Cullough*  
*Escambia Co. Ala.*

Hon. F. G. Horn, Atmore, Alabama.

Solicitor for Complainant

Recorded in Vol. .... Page .....

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this .....  
day of ..... 192

Sheriff.

Executed this *28* day of  
*October* 192*9*

by leaving a copy of the within Summons with

*Grace Presley*

Defendant.

*A. H. Brown*

Sheriff.

By .....  
Deputy Sheriff

No. 849

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.  
Baldwin County, Ala.

Tavis Presley

vs

Grace Presley

DECREE OF DIVORCE

Filed in office this 5

day of February, 1930.

J. M. [Signature]  
Register.

E. O. M. \_\_\_\_\_

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

Travis Presley Complainant vs. Grace Presley Defendant

Commissioner

Oral examination before the Register of the following witnesses:

Travis Presley, Hose Presley, W. S. Seales and Ed Presley

who reside in Alabama, said examination being conducted in Atmore, Alabama, on this the 29th day of January, and there being present

The said witnesses and commissioner

The said witnesses being first sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

Travis Presley being first sworn to speak the truth and nothing but the truth and the whole truth testified as follows: I live in Baldwin County, Alabama at Lottie, Alabama and have lived there all my life. I am about twenty-two years of age and the respondent, Grace Presley is about twenty years of age. I married the respondent on or about the 2nd day of May, 1928 and we lived together as man and wife until on or about the first part of July, 1928 at which time I discovered that she was pregnant and that the pregnancy had begun prior to the time I married her. I knew her only two weeks before I married her. I did not know of her pregnancy and it was not by my agency that she became pregnant. As soon as I discovered her condition I left her and have never lived with her since. Her child was born in August, 1928 and is still living. We lived in Baldwin County from the time we married until I left her. It was in July she told me that she was pregnant and that another was the father of her child.

Travis Presley

I, *A. Williams*, as Commissioner

hereby certify that the foregoing depositions on oral examination were taken down by me in writing in the words of the witness.es and read over to them and they signed the same in the presence of each other, at the time and place herein mentioned; that I have personal knowledge of the personal identity of the 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 in any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court, and placed the same on file in my office.

Given under my hand and seal this the 29th day of January, 1930

*A. Williams* (L. S.)

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$
.....	days' attendance at \$1.50 per day	\$

REGISTER'S FEES.

.....	days at \$1.50 per day	\$
.....	words at 20 cents per hundred	\$

The said Hose Presley being first sworn to speak the truth, the whole truth, and nothing but the truth testified as follows: I am the father of the complainant in this case. He met his wife Grace Presley on Easter Sunday in 1928 and married her about two weeks later. He is about twenty two years of age and has always lived in Baldwin County, Alabama. His wife is about nineteen years of age and lives at McCullough, Alabama. As soon as my boy found for sure that his wife was pregnant he left her and has never lived with her since.

*Hose Presley*

Ed Presley, being first sworn to speak the truth, the whole truth and nothing but the truth testified as follows: I am the brother of the complainant in this case. He is over the age of twenty-one years and has always lived in Baldwin County, Alabama. He met Grace Presley on Easter Sunday and married her a few days later. In July of that year I was at the home of the complainant and heard the respondent tell him that she was about seven months gone and would give birth to a child in a few days and that it was not his child. On August 5th the child was born. He has not lived with the respondent since he left her in July.

*E. Presley*

W. S. Seales being first sworn to speak the truth, the whole truth and nothing but the truth testified as follows: I know the respondent and the complainant in this case. The complainant met the respondent at my house and I was present when my daughter introduced her to him. This was Easter Sunday in 1928. Some week or two later he married her. He left her in July and she gave birth to a child in August.

*W. S. Seales*

**The State of Alabama,**

\_\_\_\_\_ COUNTY

**IN CIRCUIT COURT, IN EQUITY**

*Mavis Presley*

vs. Complainant,

*Grace Presley*

Defendant.

**Deposition Taken Before Register on Oral Examination**

Deposition of *Witness*

for *Complainant*

Filed *3* day of *Dec*, 19*30*

Published by order of the Court, *4*

day of *Dec*, 19*30*

*D. W. [Signature]*

Register.

Travos Presley  
.....  
.....  
vs.  
Grace Presley  
.....  
.....  
.....

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 Travis Presley, Hose Presley,  
W.S. Seales, and Ed. Presley,

and in behalf of Defendant upon

*F. W. Richerson*  
Register.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 849 February Term, 1923

Travis Presley, Complainant

vs.

Grace Presley, Defendant

To F.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. F. G. Horn

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. G. Horn  
Solicitor for Complainant.



No. 849

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THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

Travis Presley

vs.

Grace Presley

REQUEST FOR DECREE IN  
VACATION

FILED Feb 4th 1930

*J. M. Williamson*

Register

RECORDED IN ..... RECORD

..... PAGE.....

Register

No. 849

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

*Travis Presley*

vs

*Grace Presley*

NOTE OF TESTIMONY

Filed in Open Court this 4th

day of February 1930

*J. M. Williamson*

Register

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Travis Pressley

vs. Complainant,

Grace Pressley

Respondent.

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE.

Filed Dec 20th, 19 29

*T. W. Rice*, Register.

Recorded in

Record

Vol. Page

Register.

*[Faint, mostly illegible text from the reverse side of the document, including a signature and some printed text.]*

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE.

(Box 732)

MARSHALL & BRUCE CO., NASHVILLE

The State of Alabama, Baldwin County.

IN THE CIRCUIT COURT, IN EQUITY.

Travis Presley Complainant

vs.

Grace Presley Respondent

Now comes the Complainant by his Solicitor of Record and shows to the Court that on the 22nd day of October, 1929, he filed his Bill of Complaint in the above stated cause, and a summons issued in said cause and was served by the Sheriff of Escambia County on the Defendant more than thirty days prior to this date, and said Defendant has to this date failed to appear and demur, plead to, or otherwise answer the allegations of said Bill of Complaint as required by law, the Complainant, by his Solicitor of Record now moves the Register of this Court to enter up or render a Decree Pro Confesso in this cause against said Defendant.

This 20th day of December, 1929

[Signature] Solicitor for Complainant.