

878

.....

..... Frank Mason

.....

..... vs.

.....

..... Willie Lee Mason

.....

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,
... Answer of Defendant, and testimony of Frank Mason and Emit
... Lynn

and in behalf of Defendant upon

T.W. Dickerson

Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE-PTG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 878

Term, 192

Frank Mason

, Complainant

vs.

Willie Lee Mason

, 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 H. G. Moore, Attorney

for Plaintiff 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.

H. G. Moore, Solicitor for Complainant.

FRANK MASON,
COMPLAINANT.

IN THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA.

vs

WILLIE LEE MASON,
DEFENDANT.

IN EQUITY.

Comes Willie Lee Mason, defendant, in the above styled cause and for answer to same denies each and every allegation contained therein and demand strict proof of same. she waives service of subpoena on the bill filed therein by the sheriff, notice of the filing of interrogatories or any proceeding to take testimony on oral examination as well as the right to cross-examine and consents that this cause be submitted for decree on note of testimony made by the register either in term time or vacation.

Dated this 7th day of february, 1930.

WITNESSES:

LW Mannick

X Willie L Mason

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 Willie Lee Mason,

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 Frank Mason,

against said

Willie Lee Mason,

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 26th day of February

1930

T. W. Richerson Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

STATE OF ALABAMA |
BALDWIN COUNTY. |

IN THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
IN EQUITY.

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

Your Orator, Frank Mason, of Bay Minette, Alabama, respectfully represents and shows unto your Honor as follows:

FIRST:

That he is a bona fide resident of Baldwin County, Alabama, residing in Bay Minette, Alabama in said county, and has resided in Baldwin County for more than three years next preceding the filing of this bill; that he is over the age of twenty-one years.

SECOND:

That Willie Lee Mason is over the age of twenty-one years, and resides at Marlow, Alabama, Post Office address, care Ward Drug Store, Summerdale, Alabama.

THIRD:

That your Orator and the said Willie Lee Mason were lawfully married and lived together as husband and wife until April 1929 at which time the said Willie Lee Mason committed adultery with Richard Crook and that your Orator neither ~~con~~ived or condoned the said act of adultery which was committed in Baldwin County, Alabama.

PRAYER FOR PROCESS:

The premises considered, your Orator respectfully prays that the said Willie Lee Mason be made party respondent to this bill of complaint by the usual process of this Honorable Court; that such orders, decrees and publications be made on the said Willie Lee Mason as necessary to perfect service on her, and that she be required to demur, 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.

That if your Orator is mistaken in the relief prayed for, then Your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.,


H. D. Moorer, Attorney for Complainant.

FOOT NOTE:

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.


H. D. Moorer, Attorney for Complainant.

STATE OF ALABAMA |
BALDWIN COUNTY. |

Your Orator, Frank Mason of Bay Minette, Alabama, respectfully represents and shows unto your Honor as follows:-

FIRST:

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

SECOND:

That Willie Lee Mason is over the age of twenty-one years, and resides at Marlow, Alabama, Post Office address, care Ward Drug Store, Summerdale, Alabama.

THIRD:

That your Orator and the said Willie Lee Mason were lawfully married and lived together as husband and wife until April 1929 at which time the said Willie Lee Mason committed adultery with Richard Crook and that your Orator neither conived or condoned the said act of adultery which was committed in Baldwin County, Alabama.

The premises considered your Orator respectfully prays that the said Willie Lee Mason be made party respondent to this bill of complaint by the usual process of this Honorable court; that such orders, decrees and publications be made on the said Willie Lee Mason as necessary to perfect service on her, and that she be required to demur, 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.

That if your Orator is mistaken in the relief prayed for then Honor will grant unto him his such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.,

FOOTNOTE:

defendant is required to answer every allegation contained in the foregoing bill, paragraph one to three, enclusive, but not under oath. Answer under oath is hereby expressly waived.

HENRY D. MOORER.
Attorney for complainant.

The State of Alabama,
Baldwin County.

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

Frank Mason Complainant.

VS.

Willie Lee Mason Respondent.

I D. W. Rose

as Register and Commissioner

have called and caused to come before me Frank Mason,

and Emmet Lynon.

witness u named in the Requirement for Oral Examination, on the 13th day of March

1930, at the office of Register

in Bay Minette, Alabama, and having first sworn said witness u to speak the

truth, the whole truth, and nothing but the truth, the said Witnesses

doth depose and say as follows:

Testimony of Frank Mason:

My name is Frank Mason. Willie Lee Mason is my wife. We were lawfully married about seven years ago and lived together as man and wife until April, 1929, at which time I quit living with Willie Lee Mason on account of her intimacy with Richard Crook. I found Richard Crook in my house with my wife, and he jumped out of the window with his pants pulled down and there were other indications of his connection with her. Willie Lee Mason admitted to me that she had been committing adultery with Richard Crook. I did not connive or condone the said act of adultery. This happened in Baldwin County, Alabama.

Frank Mason

Sworn and subscribed to before me this 13th day of March, 1930.

D. W. Rose
Register.

Further testimony of Frank Mason:

I am a resident of Baldwin County, Alabama, and have lived in Baldwin County, Alabama, my entire life, and I am over the age of 21 years. Willie Lee Mason is a resident of Baldwin County and over twenty-one years. I reside in Bay Minette, Ala. and Willie Lee Mason reside at Marlow, Baldwin County, Alabama and her post office address is in care of Wards Drug Store, Summerdale, Alabama.

Frank Mason

Sworn and subscribed to before me this 13th day of March, 1930.

D. W. Rose
Register.

The State of Alabama, No. 878
Baldwin County

CIRCUIT COURT IN EQUITY

Frank Mason

Complainant

vs.

Willie Lee Mason,

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
Adultery,

It is further ordered, that the said Frank Mason 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 Frank Mason 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 Lee Mason,

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

This 14th day of March 19 30.

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

STATE OF ALABAMA
BALDWIN COUNTY

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

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

Your Orator, Rudolph Schrock, of Bay Minette, Alabama, respectfully represents and shows unto your Honor as follows:

FIRST:

That he is a bona fide resident of Baldwin County, Alabama, residing in Bay Minette, Alabama in said county, and has resided in Baldwin County, for more than three years next preceding the filing of this bill; that he is over the age of twenty-one years.

SECOND:

That Polly Schrock, is over the age of twenty-one years, and resides at Rabon, Alabama

THIRD:

That your Orator and the said Polly Schrock were lawfully married during the month of May 1925 and lived together as husband and wife until October 1928 at which time the said Polly Schrock committed adultery with Pat Stewart and that your Orator neither connived or condoned the said act of adultery which was committed in Baldwin County, Alabama.

PRAYER FOR PROCESS:

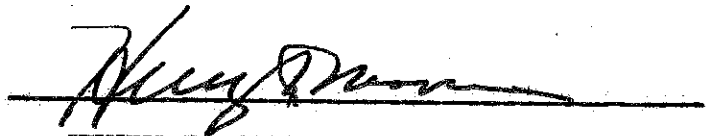
The premises considered your Orator, respectfully prays that the said Polly Schrock be made party respondent to this bill of Complaint by the usual process of this Honorable Court; that such orders, decrees and publications be made on the said Polly Schrock

as necessary to perfect service on her, and that she be required to demur, 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.


That if your Orator is mistaken in the relief prayed for, then your Honor, will grant unto him such other, further, different and general relief as he may in justice and equity 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.

RECORDED

No. 878

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

Frank Mason

vs

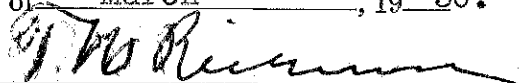
Willie Lee Mason,

DECREE OF DIVORCE

Filed in office this

26th

day of March, 19 30.



Register.

E. O. M.

Original

SERVE ON _____
Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

~~Frank Mason~~

vs.

Willie Lee Mason

H.D. Moorer,
Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____
day of _____ 19 _____

Sheriff.

Executed this _____ day of _____
19 _____

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By _____
Deputy Sheriff.

I hereby accept service
of the within subpoena
and waive service of same
by the sheriff.

February 26th, 1930

X Willie Lee Mason

Witnesses:
L.W. Mannick

Vertical text on the right side of the page, possibly a stamp or recording information, including the words "RECORDED" and "INDEXED".

Filed Feb 7th 1930
R. Williams
Clerk

RECEIVED

OFFICE OF THE CLERK

at
OFFICE OF THE CLERK

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No. 878

Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

~~Frank Mason~~
vs.

~~Willie Lee Mason~~

REQUEST FOR DECREE IN
VACATION

FILED..... March 13th, 1930..... 192.....

T.W. Pickens
Register

RECORDED IN RECORD

L..... PAGE.....

Register

No. 878

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Frank Mason

VS

Willie Lee Mason

NOTE OF TESTIMONY

Filed in Open Court this 13th

day of March 1930

T. W. Rice

Register

ORAL EXAMINATION.

I, D. W. McQueen, 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 he and read over to them and they signed the same in the presence of myself And Mrs W. H. Brown

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness he or had proof made before me of the identity of said witness he; 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 13th day of March 1930
D. W. McQueen (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Frank Mason

vs. Complainant

Willie Lee Mason

Respondent.

Oral Deposition

Filed March 13, 1930

D. W. McQueen Register.

Recorded in

Record

Vol. _____ Page _____

Register

The State of Alabama,
Baldwin County.

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

Frank Mason Complainant.

VS.

Willie Lee Mason Respondent.

D. W. Milburn

as Register and Commissioner

have called and caused to come before me Frank Mason.

and Emmet Lynn.

witness me named in the Requirement for Oral Examination, on the 13th day of March

1930, at the office of Register

in Bay Minette, Alabama, and having first sworn said witness me to speak the

truth, the whole truth, and nothing but the truth, the said Witnesses

doth depose and say as follows:

Testimony of Frank Mason:

MY name is Frank Mason. Willie Lee Mason is my wife. we were lawfully married about seven years ago and lived together as man and wife until April, 1929, at which time I quit living with Willie Lee Mason on account of her intimacy with Richard Crook. I found Richard Crook in my house with my wife, and he jumped out of the window with his pants pulled down and there were other indications of his connection with her. Willie Lee Mason admitted to me that she had been committing adultery with Richard Crook. I did not connive or condone the said act of adultery. This happened in Baldwin County, Alabama.

Frank Mason

Sworn and subscribed to before me this 13th day of March, 1930.

D. W. Milburn
Register.

Further testimony of Frank Mason:

I am a resident of Baldwin County, Alabama, and have lived in Baldwin County, Alabama, my entire life, and I am over the age of 21 years. Willie Lee Mason is a resident of Baldwin County and over twenty-one years. I reside in Bay Minette, Ala. and Willie Lee Mason reside at Mariow, Baldwin County, Alabama and her post office address is in care of Wards Drug Store, Summerdale, Alabama.

Frank Mason

Sworn and subscribed to before me this 13th day of March, 1930.

D. W. Milburn
Register.

~~xxx~~

Testimony of Euit Lynom:

My name is Euit Lynom. I am over 21 years of age and know Frank and Willie Lee Mason. Both of them are over 21 years of age and live in Baldwin County, Alabama. Both have lived in Baldwin County for more than the last three preceeding years. I know Richard Crook. Richard Crook and Willie Lee Mason was in car with me and I stopped the car for them to get out and they went off in the woods ~~to~~ together. He had been very familiar with Willie Lee Mason before getting out of the car. When they got out of car they took the back seat with them. They asked me to take them off as they wanted to put on a party of this kind. He had his hands under her clothes until he got out of the car.

Witness:

[Handwritten signature]

[Handwritten signature]
Euit Lynom
Madd

Sworn and subscribed to before me this 13th day of March, 1930.

[Handwritten signature]
Register.