

The State of Alabama, {
Baldwin County

No. 890.

CIRCUIT COURT IN EQUITY

James E.Keith, Jr.,

Complainant

vs.

Sybul S.Keith,

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 James E.Keith, Jr., 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 James E.Keith, Jr., 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

Sybul S.Keith,

It is further ordered, adjudged and decreed that the said James E.Keith, Jr., shall not again marry except to said Sybul S.Keith, until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Sybul S.Keith,

It is further ordered that James E.Keith, Jr., have the care custody and control of Annie M.Keith a girl 9 years of age, Bessie May Keith, a girl, 7 years of age, Horace J.Keith a boy 5 years of age, and Elvin Earle Keith a boy 2 1/2 years of age, children born of this marriage, subject to further orders of this Court.

This 17 day of May 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

The State of Alabama, { No. 890
Baldwin County.

Circuit Court, in Equity.

James E. Keith, Jr., Complainant

vs.

Sybul S. Keith 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.

Adultery

It further ordered, that the said James E. Keith, Jr.,
be, and ~~that~~ 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 James E. Keith, Jr.,
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 _____

Sybul S. Keith

It is further ordered, adjudged and decreed that said _____ James E. Keith, Jr.,
shall not again marry except to said _____ Sybul S. Keith _____
until sixty days after this date, and that if an appeal is taken within sixty days _____ he shall not
marry again except to said _____ Sybul S. Keith _____

It is further ordered that James E. Keith, Jr., have the care, custody and control of Annie M. Keith, a girl 9 years of age, Bessie May Keith, a girl 7 years of age, Horace J. Keith, a boy 5 years of age, and Elvin Earle Keith, a boy 2½ years of age; children born of this marriage, subject to further orders of this Court.

This 15th day of May, 1930

F. V. Hare

Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA,
Baldwin County.

Circuit Court, in Equity.

I, T. W. Richerson 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 17th day of May, 1930,
in the cause of _____

James E. Keith, Jr., Complainant

vs.

Sybul S. Keith Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the 18th
day of May, 1930

Register

8381 NOTE OF TESTIMONY

James E. Keith, Jr.,

.....

.....

vs.

Sybul S. Keith,

.....

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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 James E. Keith, Jr.,

F. B. Gardner,

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and in behalf of Defendant upon

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.....

.....

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 Sybul S.Keith

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

James E.Keithagainst said Sybul S.Keith

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 Febuary 1930

T. W. Richerson Register

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

8550 REQUEST FOR DECREE IN VACATION.

MOORE, PIG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 890

May 16th

~~1930~~ 1930

James E. Keith Jr.,

Complainant.

vs.

Sybul S. Keith,

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 A.H. Crovatt,

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.

A.H. Crovatt,

Solicitor for Complainant.

STATE OF ALABAMA
COUNTY OF BALDWIN.

In Circuit Court. In Equity.

James E. Keith, Jr.
vs.
Sybul S. Keith.

Bill for Divorce.

To the Honorable ~~F. W.~~ Hare, Judge of the Circuit Court,
Baldwin County, Alabama. In Equity sitting.

Now comes James E. Keith and humbly complaining against
Sybul S. Keith respectfully shows unto your Honor as follows:

First.

That your complainant and defendant herein are both over
the age of twenty one years, and that complainant is now, and has been
a resident of said County for more than five years immediately preceeding
the filing of this bill. That said defendant is now a resident of said
Baldwin County, Alabama.

Second.

That on April 28, 1917, your complainant and said Sybul
S. Keith, defendant herein, intermarried in due form of law and have
been ever since, and now are, husband and wife.

Third.

That during the month of February, 1930, said defendant
committed adultery with one, J. A. Dean, and on a number of occasions
other than above set out defendant committed acts of adultery with the
said J. A. Dean.

Fourth.

Complainant further alleges that as a result of said union
four children were born and are now living. Said four children being
Annie M. Keith, nine years of age, Bessie Mae Keith, seven years of age,
Horace J. Keith, five years of age and Eloise Earl Keith, two years of
age. That the said defendant is not a proper and fit person to have the
custody and control of said minor children. That your complainant is
able and competent to care and raise said children entirely suitable to
their circumstances in life.

Wherefore, the premises considered, your complainant
prays that the bonds of matrimony between him and the said defendant

No. 890.

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THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

James E. Keith, Jr.,

VS.

Sybul S. Keith,

REQUEST FOR DECREE IN
VACATION

FILED May 16th, 1930 192

J. W. Riccione
Register

RECORDED IN RECORD

VOL. PAGE

Register

Original

SERVE ON _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

James E. Keith

vs.

Sybul S. Keith

Neer Defendant

A.H. Urovatt

Solicitor for Complainant

Recorded in Vol _____ Page _____

Spanishfort

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____ 19____

Sheriff.

Executed this *Apr 7th* day of

April 19*30*

by leaving a copy of the within Summons with

Sybul S. Keith

Defendant.

P. D. Duvall

Sheriff.

By

M. H. Wilkins
DS

Deputy Sheriff.

No. 890

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

James E. Keith, Jr.,

VS

Sybul S. Keith,

NOTE OF TESTIMONY

Filed in Open Court this 16th

day of May 1930

Register

held up

NO. 890

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

James E. Keith, Jr.,

vs.

Sybul S. Keith

DECREE OF DIVORCE.

Filed in office this 10th

day of May, 1923

T. W. Richerson.

Register.

E. O. M.

RECORDED

890.

No. ~~James E. Keith Jr.~~

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

James E. Keith Jr.,

vs

Sybul S. Keith,

DECREE OF DIVORCE

Filed in office this

17th

day of

May

1930

J. W. [Signature]

Register.

E. O. M.

The State of Alabama }
Baldwin County

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

James E. Keith, Jr.

COMPLAINANT

vs.

Sybul S. Keith

RESPONDENT

I, T. W. Richerson

as Register and Commissioner

have called and caused to come before me James E. Keith, Fred Gardner

witness named in the Requirement for Oral Examination, on the 16th day of May

19 30, at the office of Register

in Bay Minette

, Alabama, and having first sworn said witness to speak the

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

doth depose and say as follows:

James E. Keith, the Complainant who being duly sworn, testified as follows:-

My name is James Keith, I am over the age of 21 years, and have been a resident of said County and State for more than Five years next preceding the filing of this Bill, and now a bona fide resident of said County and State, On April 28th, 1917, the defendant Sybul S. Keith, and I were married and have been ever since and now are husband and wife, During the Month of February, 1930, I went home late one night, and found J.A. Dean, at my house with my wife alone, later on I approached Dean, having heard that he had received a letter from my wife and forced him to give me the letter, Complainant identifies the letter marked Exhibit "A" as being in the hand writing of his wife the defendant, we have Four Minor children as the result of said marriage, ^{a girl} Annie M. Keith, 9 years of age. Bessie May Keith a girl 7 years of age, Horace J. Keith a boy 5 years of age, and Elvin ^{Marle} Keith, a boy 2½ years of age.

My wife is an unfit person to have the care, custody and control of said children, and is incapable of properly raising them, I am fully able and competent to care for and raise my children

entirely suitable to their circumstances in life.

Sybul S.Keith is over the age of 21 years.

James E Keith Jr

F.B.Gardner a witness who being duly sworn testified as follows:

My name is F.B.Gardner,I reside at Daphne Baldwin County,Ala,
and know James E Keith and his wife Sybul S.Keith,I also know,
J.A.Dean,Both are over the age of 21 years.On one occasion about the
month of Febuary 1930,I saw J.A.Dean and the defendant Sybul S.Keith
in bed together with nothing ^{on} but their night gowns on,this was
at the home of James E.Keith,who was absent from home running on the
Boat as an Engineeer, from Magnolia Springs to Mobile,on a number
of occassions I have seen the defendat at the store in which
J.A.Dean worked near Barnewell, and on one occassion,I saw J.A.Dean,
carry the defendant in his arms from the Automobile into the store,
On one occassion ^{I saw} the defendant and one Morgan Nelson,
having sexual intercourse on the ground in the woods.in my opinion
the defendant is an unfit person to have the care custody and control
of their children, and James E.Keith is fully competent and capable
of raising them in the proper manner,

All during the time I have known the Complainant and the
Defenant he has been a dutifu l ,Considerate ,husband and father,
and I know of no cause of complaint against him .

F. B. Gardner

ORAL EXAMINATION

I, T. W. Richerson, 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 presence of myself and Hon. A. H. Crovatt,

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 16th day of May 19 30.

T. W. Richerson (L. S.)
Register,

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

James E. Keith

COMPLAINANT

VS.

Sybul S. Keith

RESPONDENT

ORAL DEPOSITION

Filed May 16th, 19 30

T. W. Richerson, Register

RECORDED IN

_____, Record

Vol. _____ Page _____

_____, Register

Exhibit A.

Wednesday 12 October

My dear sweet Daddy

Darling. I'm going to go now & I'm looking this for Ed. to mail.

I got our Henry Bishop. & take my things. As done gone.

I'm going to look for a real long letter from my father - that

you do about & see my Daddy before I go. But guess are. I go

to the city - I don't sleep any last night. I don't see

any more of you.

I don't want you. Watch that for me. He was doing some terrible

things to me last night. He won't any more that about love. He

said he was coming home again & I might. I don't know if he

guess he will be some. I'm sure he will catch. Either you or me.

9. I am always glad to hear
from you and hope you are
happy and well. The things
are just as usual here.

I got home from the
store where I was selling
some of my books. I have
done some more work. I
hope you are happy and
well. I am always glad to
hear from you.
Yours truly,
for ever yours

if you had stand another
moment. Let of him with you
G. But I owe you but he
let him stand for my mouth
for till you all some time
down he had I was another yesterday

Delivered to day please

Mr J A Dean

Yuma