

The State of Alabama, }
Baldwin County.

No. CIRCUIT COURT, IN EQUITY

HAROLD NELSON

Complainant.....

vs.

JESSIE KNIGHT NELSON

Defendant.....

In this cause it appears to the ...Hon...Register of this Court...
that a Summons requiring the Defendant...Jessie Knight Nelson...

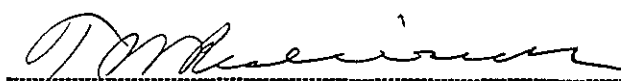
to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the
service of said Summons upon her, the said Defendant,
was served upon her...by the Sheriff...by publication of...~~County, Alabama~~
the required and authorized Notice to Defendant in the Fairhope
Courier, a weekly newspaper published at Fairhope in said county,
for the required period, as fully appears from the Affidavit of Pub-
lication of the Published thereof duly filed herein,.....

And the said Defendant ... having failed to demur, plead to or answer the said Bill of Complaint
for thirty days after the completion of such service by publication, and
to this date, it is now, therefore, on motion of.....
..Edward P. Totten, Solicitor for Complainant,.....

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 Defendant and Respondent, Jessie Knight Nelson,

Defendant...aforesaid.

This 7th day of July 1930


Register.

V 91R

RECORDED

No. _____ Page _____

The State of Alabama,
Baldwin County

Circuit Court In Equity

HAROLD NELSON

vs.

JESSIE KNIGHT NELSON

Decree Pro Confesso On
Personal Service.

PUBLICATION

Issued *July 7th* 19 *30*

J. W. Richardson
Register.

The State of Alabama, { No. 901
Baldwin County.

Circuit Court, in Equity.

Harold Nelson

vs.

Complainant

Jessie Knight Nelson

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 Voluntary Abandonment

It further orderd, that the said Harold Nelson be, and 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 Harold Nelson 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

Jessie Knight Nelson

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

This 14th day of July

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 _____, 192____, in the cause of _____

Complainant

vs.

Defendant

appears of record in said Court.
Witness my hand and the seal of said Court, this the _____ of _____, 192____

Register

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RECORDED

NO.

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY,
BALDWIN COUNTY, ALA.

Harold Nelson

vs.

Jessie Knight Nelson

DECREE OF DIVORCE.

Filed in office this *14th*

day of *July*, 19*20*

T. H. McCombs

Register.

E. O. M.

14 912

RECORDED

No. 701

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Harold Nelson

VS

NOTE OF TESTIMONY

Filed in Open Court this 1/10/30

day of July 1930

T. M. Rice
Register

8581 NOTE OF TESTIMONY

Harold Nelson,

vs.

Hattie Knight Nelson

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 Harold Nelson
Guy Bridges and Andrew Nelson,

and in behalf of Defendant upon

T W Reserson

Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 901 Vacation Term, 192³⁰

Harold Nelson , Complainant

vs.

Jessie Knight Nelson , 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 Edward P. Totten

..... 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.

Edward P Totten

.....
Solicitor for Complainant.

97 **RECORDED** *J.R.*

No. 901.....

Page.....

**THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY**

Harold Nelson.....

.....
VS.

Jessie Knight Nelson.....

**REQUEST FOR DECREE IN
VACATION**

FILED..... July 12th 1930 192.....

[Signature]
.....
Register

RECORDED IN RECORD

VOL. PAGE.....

.....
Register

THE FAIRHOPE COURIER

ERNEST B. GASTON, EDITOR AND PUBLISHER

A PROGRESSIVE PAPER FOR PROGRESSIVE PEOPLE

ESTABLISHED 1894

FAIRHOPE, ALABAMA

State of Alabama)
Baldwin County)

Before me, a Notary Public in and for said

county in said state, personally appeared ~~before me~~ E.B. Gaston

who, being my me first duly sworn, deposes and

says, that he is the publisher of the Fairhope

Courier, a newspaper published weekly at Fairhope,

Alabama, and that the attached Notice to Non-Resi-

dent Defendant was published in the Fairhope Courier

a weekly newspaper of general circulation in said

county four times to-wit: in the issues of May 8,

May 15, May 22 and May 29, all in the year 1930.

E.B. Gaston
Publisher The Fairhope Courier,

Subscribed and sworn to before me this 21st day of

April, 1930.

HAROLD NELSON, Complainant.

vs.

JESSIE KNIGHT NELSON, Defendant
THE STATE OF ALABAMA,
COUNTY OF BALDWIN,
IN CIRCUIT COURT, IN EQUITY
NOTICE TO NON-RESIDENT
DEFENDANT

It having been made to appear to the Clerk of this Court, by the affidavit of Harold Nelson, that the Defendant, Jessie Knight Nelson, is a non-resident of the state of Alabama whose place of residence is unknown to affiant, and that the Defendant is over the age of 21 years, you, Jessie Knight Nelson, Defendant, will take notice that, by this publication in the Fairhope Courier, a newspaper published in Fairhope, Baldwin County, Alabama, once a week for four consecutive weeks, you are required to answer or demur to the Bill of Complaint in this cause by the 1st day of June, 1930, or after thirty days therefrom a Decree Pro Confesso may be taken against you, the said Defendant, therein.

Dated this 3rd day of May, 1930.

T. W. Richerson, Register.

Edward P. Totten,

Solicitor for Complainant. 40-4t.

The recent government census in

PUBLISHER'S FEE:

\$7.79

Car L B. Gaston
Notary Public, State of Alabama, Baldwin County
My Commission expires April 4, 1932

The State of Alabama, }

BALDWIN COUNTY. }

CIRCUIT COURT, IN EQUITY.

No. _____ July _____ Term, 1920

Harold Nelson

Complainants

vs.

Jessie Knight Nelson

Defendants

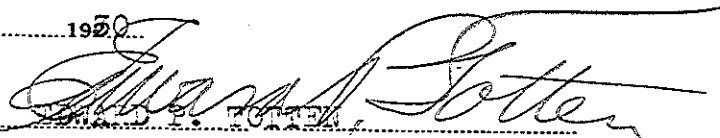
Motion is hereby made for a Decree Pro Confesso against Jessie Knight Nelson

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 7th day of July 1920

746 Code.


Edward P. Porter
Solicitor.

1 FR
RECORDED

No. Page

**STATE OF ALABAMA,
Baldwin County.**

CIRCUIT COURT, IN EQUITY.

HAROLD NELSON

Complainants.

Vs.

JESSIE KNIGHT NELSON

Defendants.

**MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.**

Filed July 7th, 19230

J. W. [Signature]
Register.

Recorded in Record,

Vol. Page

Register.

Baldwin Times Print, Bay Minette.

STATE OF ALABAMA
COUNTY OF BALDWIN

IN CIRCUIT COURT
IN EQUITY

HAROLD NELSON, Complainant,

vs.

BILL OF COMPLAINT

JESSIE KNIGHT NELSON, Defendant

To the Honorable F. W. Hare, Judge of said Circuit Court:

Complaining of the above named Defendant, your orator respectfully shows unto your Honor and to this Court, as follows:

That your orator is over the age of twenty-one years and for more than three years immediately preceding the date of this bill has been, and now is, a resident of Baldwin county, Alabama;

That the Defendant is over the age of twenty-one years and that, on August 14th, 1927, at Fort Lauderdale, Broward county, Florida, your orator intermarried with said Defendant and that they have ever since been, and now are, lawful husband and wife;

That, on or about the first day of April, 1928, the Defendant, without any just cause, provocation or excuse, wilfully abandoned your orator, leaving his bed and board, and ever since said date, and for a period of more than two years immediately preceding the filing of this bill, has continued in such abandonment, and so continues at the date of the filing of this bill of complaint;

That the present address and whereabouts of the Defendant are to your orator unknown and that your orator has been unable to learn or discover the present address and location of Defendant after reasonable effort in that behalf.

THE PREMISES CONSIDERED, your orator respectfully prays that said Jessie Knight Nelson be made party respondent to this bill of complaint, by the usual process of this Honorable Court, and that she be required to demur, plead to or answer such bill within the time and under the penalties as provided by law, or that the same be forever confessed.

P R A Y E R F O R R E L I E F

Wherefore, your orator prays that, upon the final hearing of this cause, the bonds of matrimony heretofore and now subsisting between himself and Jessie Knight Nelson be wholly dissolved and that your orator be granted an absolute divorce therefrom, and that your orator may have such other and further relief as may to the Court seem just and equitable in the premises.

Dated April 30th, 1930.

(Fairhope, Ala.)

Edward P. Gotten
Solicitor for Complainant

FOOTNOTE: The respondent above named is required to answer every allegation contained in the foregoing bill, but not under oath; answer under oath being hereby expressly waived.

Edward P. Gotten
Solicitor for Complainant

STATE OF ALABAMA)
 (ss.
COUNTY OF BALDWIN)

Harold Nelson, being by me first duly sworn, on oath says: that he is the complainant named in the foregoing bill of complaint, that he has read and understands the contents thereof, and that all of the statements therein contained, including the one relating to the residence of Defendant being unknown to him, are true of his own knowledge.

Harold Nelson

Subscribed and sworn to before me this 1st day of May, 1930.

G. E. Perkins
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

STATE OF ALABAMA
COUNTY OF BALDWIN

IN CIRCUIT COURT
IN EQUITY

HAROLD NELSON, Complainant,

vs.

JESSIE KNIGHT NELSON, Defendant.

The Depositions of HAROLD NELSON, GUY BRIDGES and ANDREW NELSON, witnesses examined on behalf of the COMPLAINANT in the above entitled action which is now pending the Honorable the Circuit Court of Baldwin County, Alabama.

The said witnesses appeared before me at the time and ~~ix~~ place hereinaftermentioned and, after having been sworn by me to speak the truth, the whole truth and nothing but the truthm did testify and say as follows:

TESTIMONY SUBMITTED ON ORAL INTERROGATORIES ON BEHALF OF THE
COMPLAINANT IN PENDING CAUSE OF NELSON vs. NELSON, BY HAROLD
NELSON? Complainant, testifying in his own behalf:

Q.- What is your name, age and residence?

A. Harold Nelson, 25 years of age, Fairhope, Alabama.

Q. What place has been your residence for the three years next
preceding the date of the filing of this action?

A. Fairhope, Baldwin County, Alabama; I have lived in this county
all my life.

Q. How old is the Defendant, Jessie Knight Nelson, and when and
where did you marry her?

A. Defendant is about 24 years old, and I married her at Fort
Lauderdale, Broward county, Florida, on August 14th, 1927.

Q. When did the Defendant desert and abandon you?

A. In the first part of April, 1928, the Defendant left my home
and has never returned to it.

Q. Did you at all times treat the Defendant in a proper manner
and conduct yourself as a good husband toward her?

A. Yes, sir, I tried to.

Q. Did you give her any just cause or provocation for leaving you
and did she leave your home without any fault on your part?

A. I did not give her any cause whatever for leaving me. She left
me against my wish and refused to return to me.

Q. Had this abandonment by the Defendant continued for more than
two years immediately prior to the commencement of this suit?

A. Yes, over two years.

Harold Nelson

Subscribed and sworn to before me this 10th day of July, 1930.

J. E. Peckin

Commissioner.

TESTIMONY SUBMITTED ON ORAL INTERROGATORIES ON BEHALF OF THE COM-
PLAINANT IN PENDING CAUSE OF NELSON vs. NELSON, by GUY BRIDGES.
Witness on behalf of the Complainant:

Q.- What is your name, age and residence?

A. Guy Bridges, aged 29 years, and am now living at Fairhope, Ala.

Q. How long have you known the Complainant, Harold Nelson?

A. I have known him about five years.

Q. Do you know the Defendant, Jessie Knight Nelson, and did you
know her at the time of her marriage to the Complainant?

A. Yes, sir.

Q. When and where were the Complainant and Defendant married?

A. In August, 1927, at Fort Lauderdale, Florida.

Q. Do you know that the Defendant left the home of the Complainant and has remained continuously away from him for more than two years?

A. Yes, sir, she left the Defendant early in the Spring of the year 1928 and she has not returned to him or lived with him since that time?

Q. Did you visit at the home of the Complainant and Defendant while they were living together as husband and wife?

A. Yes, sir.

Q. Did the Complainant provide a good and suitable home for the Defendant and provide her with all the necessities and comforts which his financial situation permitted?

A. Yes, sir.

Q. Do you know of any reason why the Defendant should or did leave the home of the Complainant and refuse to live longer with him?

A. She left the Defendant on her own accord and not for any action toward her on his part, so far as I could learn.

Mary Bridges

Subscribed and sworn to before me this 10th day of July, 1930.

G. E. Peckin

Commissioner.

TESTIMONY SUBMITTED ON ORAL INTERROGATORIES ON BEHALF OF THE COMPLAINANT IN ABOVE ENTITLED CASE by ANDREW NELSON, Witness for the Complainant:

Q. What is your name, age and residence?

A. Andrew Nelson, 27 years old, Point Clear, Baldwin co., Ala.

Q. How long have you known the Complainant Harold Nelson?

A. I have known him all my life; he is my brother.

Q. Are you acquainted with the Defendant, Jessie Knight Nelson, and did you know her during the time she was living with the Complainant as his wife?

A. Yes, sir.

Q. When did she leave the home of Complainant and has she ever returned to it?

A. She left him in the early Spring of 1928, over two years ago, and she has never come back to him?

Q. So far as you know, did the Complainant ever give the Defendant any just cause or provocation for leaving him?

A. No, sir, he did not, to the best of my knowledge.

Q. How long has the Complainant lived in Baldwin county, Ala.?

A. He has lived here all his life, except when he has been away temporarily at work somewhere.

Andrew Nelson

Subscribed and sworn to before me this 10th day of July, 1930.

G. E. Peckin

COMMISSIONER

STATE OF ALABAMA
COUNTY OF BALDWIN

IN CIRCUIT COURT
IN EQUITY

HAROLD NELSON, Complainant,

vs.

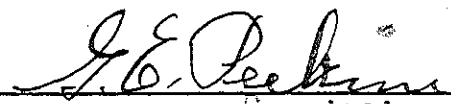
HESSIE KNIGHT NELSON, Defendant.

CERTIFICATE OF COMMISSIONER

I, G. E. Perkins, the Commissioner named in the attached commission, hereby certify that, in pursuance of the said commission, I did, on Thursday, July 10th, 1930, call and cause to come before me, at the offices of Edward P. Totten, Esq., in the Bank of Fairhope Building, at Fairhope, Baldwin County, Ala., the said witnesses, Harold Nelson, Guy Bridges and Andres Nelson, and that the said witnesses, after having been first duly sworn, did testify in answer to oral interrogatories propounded to them by Edward P. Totten, Esq., Solicitor for the Complainant, as set down above their signatures, and that the answers of said witnesses are set down as near as might be in their own language and that they subscribed their names thereto after having heard the same read to ~~th~~ in my presence.

I further certify that I am neither of counsel nor of kin to any of the parties to this suit, nor am I in any manner interested in the result thereof.

Witness my hand this 10th day of July, 1930.



Commissioner

The State of Alabama,
Baldwin County

CIRCUIT COURT

To Hon. G. E. Perkins,

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Guy Bridges and Andrew Nelson
and the Complainant, Harold Nelson,

as witnesses in behalf of Complainant, in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

Harold Nelson

and Complainant
Jessie Knight Nelson,

Defendant,
on oath to be by you administered, upon Oral testimony,
to take and certify the deposition... of the witness es. and return the same to our Court, with all convenient speed, under your hand.

Witness 7th day of July 1930

COMMISSIONER'S FEE, \$ 5.00 Ph.
WITNESS' FEES, \$

T. W. Reimer
REGISTER

NO. _____

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

Harold Nelson

vs. Complainant _____

Jessie Knight Nelson

Defendant _____

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

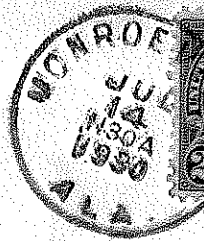
G.E. Perkins

WITNESSES:

After five days return to

T. W. RICHERRSON

STER AND CLERK OF THE CIRCUIT COURT
BALDWIN COUNTY
BAY MINETTE, ALA.



T. W. Richerrson,
Bay Minette, Alabama.

