

The State of Alabama,  
Baldwin County.

No. 923

Circuit Court, in Equity.

Beaulah Lambert

Complainant

vs.

Rubert Lambert

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 and Cruelty.

It further ordered, that the said Beaulah Lambert

be, and s. 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 Beaulah Lambert 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

Rubert Lambert

It is further ordered, adjudged and decreed that said Beaulah Lambert shall not again marry except to said Rubert Lambert until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Rubert Lambert

during the said pendency of appeal

This 24<sup>th</sup> day of September 1930

J. W. Ware  
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

as appears of record in said Court.

Witness my hand and the seal of said Court, this the \_\_\_\_\_

day of \_\_\_\_\_ 192\_\_\_\_

Register

RECORDED

NO. 923

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY,  
BALDWIN COUNTY, ALA.

Beulah Lambert

vs.

Rubert Lambert

DECREE OF DIVORCE.

Filed in office this 24<sup>th</sup>

day of ~~24~~ September 1930, 1932

*D. M. Richardson*  
Register.

E. O. M.

Beulah Lambert,

Complainant

vs

Rubert Lambert,

Respondent

In the Circuit Court of Baldwin County,  
Alabama.

In Equity .

To Honorable Francis W Hare, Judge of the Twenty First Judicial Circuit of Alabama, which includes Baldwin County, humbly complaining, Your Oratrix, Beulah Lambert, respectfully represents unto your Honor as follows:

1. Your Oratrix, Beulah Lambert and respondent Rubert Lambert were lawfully married at Century, Florida, on to wit, July 9th, 1927 and lived as husband and wife until April 19th, 1928, when Oratrix caught said Rubert Lambert, her husband and respondent aforesaid, in the act of adultery and fornication with one Myrtle Lowery. Said <sup>act</sup> was committed near the house in a swamp near where we lived. Prior to this marriage with respondent your Oratrix had been a bona fide resident of the state of Alabama all her life and went to live with respondent where he was working after her marriage to him. Since said act of adultery and fornication aforesaid by respondent with the aforesaid Myrtle Lowery, Oratrix has not lived with respondent said Rubert Lambert, but went to live at Bay Minette, Ala. in Baldwin County where she secured work and employment and where ~~h~~ she has resided ever since, since to wit, April 29th, 1928. She has been a bona fide resident citizen of the state of Alabama and Baldwin county, since April, 28th, 1928 when respondent by his conduct forced her to abandon him and she sets up voluntary abandonment as another ground for divorce in this cause and alleges she had at all times and in every way treated her husband said Rubert Lambert, as a dutiful and obedient wife should, yet Respondent did not treat her as a good husband should do and was as such in duty bound to so do; before respondent forced your Oratrix to leave and abandon him as she did, he had treated her cruelly and abused her most shamefully, cursed and abused <sup>her</sup> ~~abused~~ almost at all meal times every day and at last threatened to kill her. His conduct was so cruel and abusive, Your Oratrix at times was in great fear personal of harm and injury to her person by respondent, Rubert Lambert: so much so that your Oratrix was afraid to continue to live with respondent any longer. After said act of adultery by respondent with said Myrtle Lowery, Oratrix decided to leave the house where we had been living in Century, Florida and came to Bay Minette, In Baldwin County, Alabama to live and work for herself

Where she has resided ever since she left respondent as aforesaid on April 19th, 1928. Respondent, the said Rubert Lambert resides now at Century Florida.

3. Your Oratrix and respondent are both over the age of twenty one years, your Oratrix residing now at Bay Minette, Alabama and respondent residing at Century Florida.

Wherefore the premises considered, your Oratrix, prays a subpoena be issued and directed to the said Rubert Lambert, the respondent, in this cause and that he be brought into this honorable court and directed to answer the charge herein made against him under the rules of this honorable court; that he be made a party defendant or respondent to this bill of complaint and that upon a final hearing of the evidence your honor order, adjudge and decree that the bonds of matrimony - heretofore existing between your Oratrix and the said Rubert Lambert be forever dissolved and that your oratrix be permitted to marry again and that she be granted such other and further relief as may in all equity and good conscience seem proper and meet to your Honor and Your Oratrix will ever pray etc.

S. Jenkins

Solicitor for Complainant .

Footnote:

The respondent is required to answer each and every paragraph of the foregoing bill from 1 to 3 inclusive, but his answer under oath is hereby waived expressly .

S. Jenkins

Solicitor for Complainant .

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

Beulah Lambert Complainant.

VS.

Rubert Lambert Respondent.

T. W. Richerson,

I

as Register and Commissioner

have called and caused to come before me Beulah Lambert and Mabel Richberg

witness as named in the Requirement for Oral Examination, on the 20th day of September,

1930, at the office of T. W. Richerson, Register in Chancery

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

truth, the whole truth, and nothing but the truth, the said ~~Beulah Lambert~~ witnesses

doth depose and say as follows:

Beulah Lambert, testified as follows: I am the complainant in the above stated cause. On the 9th day of July, 1927, Rubert Lambert and myself were married at Century, Florida. We lived together as husband and wife until April 19, 1928, at which time we were still living at Century, Florida. At this time, I ceased to live with him, because he abused me and threatened to kill me, and didn't support me. He abused me every day, and his conduct was such toward me that I was afraid to live longer with him, and went to live at Bay Minette, Alabama, where I have lived ever since. The day we separated, I caught Rubert Lambert in an act of adultery and fornication with one Myrtle Lowery. I saw this act of Rubert Lambert's and Myrtle Lowery's with my own eyes. It was in a swamp about a quarter of a mile from the house where we had been living at Century, Florida. I followed my husband there and watched him, and saw what he did. When I accosted them, Myrtle Lowery said that she hadn't said anything to him. I replied that it wasn't what she said, but what she did, and she did plenty. My husband was standing there hearing the conversation between myself and Myrtle Lowery, and didn't deny the charge I made. I have been a bona fide resident citizen of the State of Alabama, Baldwin County,

since April 28, 1928, when my husband's conduct towards me became so unbearable and disgraceful that I was forced to leave him. I was at all times a faithful and dutiful wife to my husband, and obeyed him in every respect. The morning I left his home he had threatened to kill me. He cursed and abused me most shamefully, and at times treated me cruelly. Before I married my husband on July 9, 1927, I had been living at Flomaton, Alabama, where I had been living all my life up to that time.

I am over the age of twenty-one years, and at present a resident of Bay Minette, Alabama.

Respondent, Rubert Lambert, is over the age of twenty-one years, and at present resides at Century, Florida.

*Beulah Lambert*

Mabel Richberg, a witness for the Complainant, after being duly sworn, testified as follows: My name is Mabel Richberg. I live at Bay Minette, Alabama, at present. I formerly lived at Flomaton, Alabama. I have known Beulah Lambert all my life. We were raised together as girls in the same community. After Beulah

Lambert married Rubert Lambert, I visited their home often at Century Florida, about two and a half miles from Flomaton. I know how Rubert Lambert treated his wife, Beulah Lambert. He cursed and abused her often, and at times treated her mean and cruelly. I have even heard her threaten to kill her. I know the time that Beulah Lambert left Rubert Lambert. It was about another woman that she caught her husband in sexual intercourse with. This woman's name is Myrtle Lowery. Rubert Lambert had a reputation of going with women of doubtful character, known as lewd women in the communities of Flomaton and Century. I was living in Flomaton at the time that Beulah Lambert left Rubert Lambert, and know all the circumstances that caused her to leave, for it was general talk in the community. I was at the home often and know that Rubert Lambert treated her shamefully and cruelly, besides neglecting her and running around with other women. Beulah Lambert and Rubert Lambert are both over the age of twenty-one years. Beulah Lambert resides now at Bay Minette, Alabama, and Rubert Lambert resides at Century, Florida.

*Mabel Richberg*

ORAL EXAMINATION.

I, T. W. Richerson,, as Register and Commissioner hereby certify that the foregoing deposition s 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 presense of myself and S. C. Jenkins 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 20th day of September, 1930.

T. W. Richerson (L. S.)

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THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Beulah Lambert

vs. Complainant

Robert Lambert

Respondent.

Oral Deposition

Filed Sept. 20, 1930.

T. W. Richerson, Register.

Recorded in

Record

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Register

8550 REQUEST FOR DECREE IN ~~vacation~~ Term Time

MOORE PTC CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 923.

Non Jury Sept Term, 1923

Beulah Lambert, Complainant.

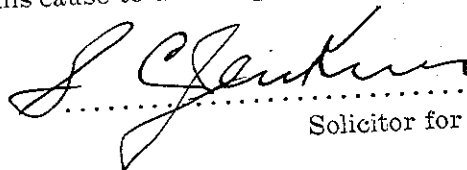
vs.

Rubert Lambert, 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 S.C. Jenkins

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.



Solicitor for Complainant.



No. 923

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THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

Beaulah Lambert.....

VS.

Robert Lambert.....

REQUEST FOR DECREE IN  
VACATION

FILED Sept 20th 1930

*W. R. R. R. R. R.*

Register

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Register

Beaulah Lambert, )  
Complainant )  
vs )  
Rubert Lambert )

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

Comes Rubert Lambert, defendant in the above styled case or cause and for an answer to same denies every allegation contained therein or alleged therein and demands strict proof of same. He waives<sup>service</sup> of subpoena by the sheriff of said Bill, notice of advertisement - against him as a non~~re~~ resident , notice of the filing of interrogatories or taking of testimony on either oral or written examination, as well as the right to cross examine and consents that this cause may be submitted for decree on note of testimony either in term time or vacation

Rubert Lambert

Witnesses:

[Signature]  
[Signature]

8581 NOTE OF TESTIMONY

Beulah Lambert

vs.

Rubert Lambert,

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 Beulah Lambert and Mable.....  
Richberg,

and in behalf of Defendant upon

*J. M. Richberg*  
Register.

No. 923.

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Beaulah Lambert

VS

Rubert Lambert

NOTE OF TESTIMONY

Filed in Open Court this 20th  
day of September 1930

*D. W. Rice*

Register