

The State of Alabama,  
Baldwin County.

No. 926

Circuit Court, in Equity.

Bolton H. Possien

Complainant

vs.

Anna Lee Possien

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 of Defendant, Anna Lee Possien.~~  
on account of Voluntary abandonment.

It further ordered, that the said Bolton H. Possien 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 Bolton H. Possien 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 Anna Lee Possien.

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

This 26<sup>th</sup> day of March 1931  
F. 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

NO. 926

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY,  
BALDWIN COUNTY, ALA.

Bolton H. Possien

vs.

Anna Lee Possien

DECREE OF DIVORCE.

Filed in office this

28th

day of

March

1923

*[Signature]*

Register.

E. O. M.

Moore Printing Co. Bay Minette, Ala.

*[Signature]*

926

EVA PARSONS,  
Complainant,  
VS.  
JOSEPH PARSONS,  
Respondent.

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

MOTION FOR DECREE PRO CONFESSO

Motion is hereby made for a Decree Pro Confesso against  
X Joseph Parsons, the Respondent in the above entitled cause, on  
ground that more than thirty days have elapsed since service was  
effected upon the said Respondent; which said service was by publication  
according to law, and the said Respondent has failed to  
plead, answer or demur to the Bill of Complaint in this cause to  
this date.

Dated this the 18th day of May, 1931.

J. B. Blackmur  
Solicitor for Complainant.

STATE OF ALABAMA,  
COUNTY OF BALDWIN.

IN CIRCUIT COURT  
IN EQUITY.

BOLTON H. POSSIEN, COMPLAINANT,

vs.

ANNA LEE POSSIEN, RESPONDENT.

Comes the Respondent, Anna Lee Possine, in the above styled cause, and accepts service, by copy, of the Amended Bill of Complaint filed herein, and for answer ~~thereto~~ and to each and every paragraph thereof, separately and severally, says:

1. For answer to the first paragraph of said bill, she admits the allegations therein contained to be true.
2. For an answer to the second paragraph of said bill, she admits the allegation therein contained to be true.
3. For an answer to the third paragraph of said bill of complaint, she denies each and every allegation therein contained, and demands strict proof thereof.

And now, having fully answered said bill, as required by said court, respondent prays that she may be discharged with her reasonable costs in this behalf expended.

W. H. Campbell  
Solicitor for Respondent.

Balton H Posien  
D.S.  
Anna Lee Posien

Ansurs. of Deft  
Filed Nov 11th/931  
D.V. Receiving  
Register

*[Handwritten signature]*

STATE OF ALABAMA  
COUNTY OF BALDWIN

IN CIRCUIT COURT  
IN EQUITY

BOLTON H. POSSIEN, Complainant and Cross-Defendant.

vs.

ANNA LEE POSSIEN, Respondent and Cross-Complainant.

To the Hon. F. W. Hare, Judge of Said Circuit Court:

Now comes Bolton H. Possien, Complainant and Cross-Defendant in the above entitled cause, and herewith submits his answer to the Cross-bill herein as follows: For an answer to the first paragraph of said Cross-bill the Cross-Defendant admits the truth of the allegations therein contained.

For an answer to the second paragraph of said Cross-bill the Cross-Defendant denies each and every allegation therein contained except such as are hereinafter specifically admitted or qualified. The Cross-Defendant admits that he and the Cross-Complainant were lawfully married on or about December 13th, 1917, and that they lived together as man and wife in Baldwin County, Alabama; He admits that there are living two children as the issue of such marriage and that their names and ages are respectively: Eugene R. Possien, eleven years, and Bolton H. Possien Jr., three years. He admits that the Cross-Complainant has no separate estate and that he is an able bodied man and makes money from his labor.

The Cross-Defendant denies specifically the truth of the allegation that he abandoned his wife, the Cross-Complainant, without fault on her part and against her wishes on February 12th, 1928, and that such abandonment has been continuous to the present time, and on the contrary alleges the fact to be that Cross-Defendant has continued to provide for the support and comfort of his wife and their two children up to the present time, although the Defendant was obliged to go to the State of Texas to obtain employment in his profession which is that of musician. The Cross-Defendant admits that the two children are in the custody of the Cross-Complainant and have been during the period he has been necessarily away from home at work at his pro-

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P.D.  
fession but denies that it would be to the interest of said children to have their custody and control awarded to the Cross-Complainant.

Wherefore Complainant and Cross-Defendant prays that the Respondent and Cross-Complainant be denied any relief whatever under her said Cross-bill, and prays that the same may be dismissed and that Complainant have such other and further relief as may be just and equitable in the premises.

Dated this 20th day of October, 1930.

*Edward F. Otten*  
\_\_\_\_\_  
SOLICITOR FOR COMPLAINANT & CROSS-DEFENDANT.

RECORDED

In Circuit Court  
In Equity -

Possien v. Possien

Answer  
of Cross-Defendant

Filed Oct 29/93  
J. W. Williamson  
Register

Edward P. Totten  
Solicitor for Cross-Def.

RECORDED

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Bolton H. Possien,  
Complainant.

vs.

Anna Lee Possien,  
Defendant.

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

Comes the Defendant in the above entitled cause and not waiving the demurers heretofore filed in said cause, but expressly insisting upon the same, answers as follows:-

- First: Respondent admits what is alleged in first paragraph of said Bill of Complaint as to her and Complainant being lawfully married and living together as man and wife, but denies the date of her marriage as alleged in said Bill of Complaint, and demands strict proof of same.
- Second: Respondent admits what is alleged in the second paragraph of said Bill of Complaint as to the birth and ages of their children.
- Third: Respondent indigantly denies what is alleged in the third paragraph of said Bill of Complaint as to her committing adultery with Rollie Leavens or anyone else, and demands strict proof of same.
- Fourth: Respondent indigantly denies that she is not a fit and proper person to have the custody and control of the two children, the issue of her unfortunate marriage, and demands strict proof of the same.

Respondent herewith files her Cross-Bill against the Complainant.

And having as fully answered said Bill of Complaint as Respondent is advised she is to do, prays her discharge with her costs.

Anna Lee Possien

*W. H. Thompson*  
*Attorney for Respondent.*

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Figure 1. Schematic representation of the experimental design. The subjects were divided into two groups: the control group and the experimental group. The control group received a standard diet and water, while the experimental group received a diet supplemented with 0.5% of the active ingredient. The subjects were then subjected to a 10-day period of physical training. The results of the experiment are shown in the bar graphs.

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Figure 1. *Chemical structures of the monomers and the copolymers.*

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*Wm. W. Phelps*

*[Faint handwritten notes or signatures]*

VS.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

First: Because said bill fails to allege that the Complainant is now and has been a bona fide continuous resident of Baldwin County, Alabama, for more than one year next preceeding the filing of his original bill in this cause.

Solicitor for Complainant.

Anna Lee Possien,  
Cross-Complainant.

vs.

Bolton H. Possien,  
Cross-Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY.

State of Alabama,

Mobile County.

Before me, Thelma Leslie, a Notary Public, in and for said County and State, personally appeared Anna Lee Possien, Defendant in the original bill and Cross-Complainant in her Cross-bill, who is known to me and who being by me first duly sworn, deposes and says, that she has not any money to pay her attorneys for their legal services rendered and to be rendered her in said causes, nor has she any money to defend the original suit, nor prosecute her Cross-bill. That Affiant does not own any separate estate. That Complainant and Cross-Defendant, Bolton H. Possien, is an able bodied man and possesses the factulities of making money and does make money out of his labor or his accumulations.

Anna Lee Possien  
Defendant and Cross-Complainant.

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

Thelma Leslie  
Notary Public.  
Mobile County,  
State of Alabama.

STATE OF ALABAMA  
COUNTY OF BALDWIN

IN CIRCUIT COURT  
IN EQUITY

BOLTON H. POSSIEN, Complainant,

vs.

ANNA LEE POSSIEN, Respondent,

Comes now the Respondent, Anna Lee Possien, in the above styled cause, and accepts service of a copy of the foregoing interrogatories, waives her right to cross the same, and consents that G. E. Perkins, of Fairhope, Alabama, and William O. Bowers, Jr., of Beaumont, Texas, suggested as fitly suitable and competent persons to take the testimony in said cause, be commissioned in that behalf.

Mrs Anna Lee Possien

WITNESSES:

G. E. Perkins

Eugene Possien

INTERROGATORIES TO BE PROPOUNDED TO THE WITNESS BOLTON E. POSSIEN  
(by Edward P. Totten, Solicitor for Complainant)

1. What is your full name and age?
- 1a. What is your occupation or profession?
2. Where are you living and working at the present time?
3. Where is your residence (in what county and state and town) and how long have you resided there?
4. When did you marry the Defendant, Anna Lee Possien? and where?
5. How long did you live with the Defendant at Mobile, Ala., and when did you remove with her to Fairhope?
6. At what time and where did the Defendant abandon you?
7. Did you give her any cause or reason for leaving you?
8. Did you at all times treat her in a proper manner and act toward her as a dutiful husband?
9. Was the abandonment by her with your consent or inducement?
10. How long has this abandonment continued and have she ever during that period lived with you or cohabited with you as your wife?

Bolton H. Possien.

vs.

Anna Lee Possien.

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint.....  
 .....Service on Defendant, Answer of Defendant, Amended Bill of  
 .....Complaint, Dismissal of Cross-bill, and Testimony of Valentine  
 .....H.Oswald and Bolton H.Possien.....

and in behalf of Defendant upon .....

Dr. Richardson  
Register.

No. 926

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Bolton H. Possien

VS

Anna Lee Possien

NOTE OF TESTIMONY.

Filed in Open Court this 24th

day of March 1931

*J W Possien*

Register



BOLTON H. POSSIEN, Complainant,

vs.

ANNA LEE POSSIEN, Defendant.

IN CIRCUIT COURT, IN EQUITY,

of

BALDWIN COUNTY, ALABAMA

THE DEPOSITIONS

of Bolton H. Possien

~~and~~

witnesses examined on behalf of the Complainant in the above entitled cause which is pending in the Circuit Court of Baldwin County, Alabama;

The said witnesses appeared before me at the time and place hereinafter mentioned and, after having been first duly sworn to ~~ask~~ speak the truth, the whole truth and nothing but the truth, did testify and say as follows:

THE DEPOSITION OF BOLTON H. POSSIEN, COMPLAINANT IN THIS CAUSE, testifying in his own behalf in response to written interrogatories submitted by Edward P. Totten, Solicitor for Complainant.

\*

My name is Bolton Hall Possien, and I am past thirty years of age. By profession I am a musician and I have been working with orchestras for over ten years. At the present time I am living and working at my profession in the city of Beaumont, Texas, where I have been for the past two years. My residence is at Fairhope, in Baldwin county, Alabama, where I have lived and resided since the early part of the year 1926. I was married to Anna Lee Possien, the Defendant on December 13th, 1917, at the city of Mobile, Alabama, and we lived there until we moved to Fairhope. My wife abandoned me at Fairhope in the spring of the year 1928 and has never lived with me since that time. She had no cause or reason for leaving me, as I was always good to her in every way, but she liked a gayer life than I was able to provide for her from my earnings. I always treated her properly and certainly tried to be a good husband to her. She did not leave me through any fault or act of mine and her abandonment of me was entirely on her own account. Her abandonment has continued without interruption since the Spring of the year 1928 and right up to the present date, fully three years.

Witness my hand this 24th

Bolton Hall Possien  
Complainant

Edward P. Totten  
Solicitor for Complainant

BOLTON H. POSSIEN, Complainant,

IN CIRCUIT COURT, IN EQUITY,

vs.

of

ANNA LEE POSSIEN, Defendant.

BALDWIN COUNTY, ALABAMA

CERTIFICATE OF COMMISSIONER

I, William O. Bowers, Jr., the Commissioner named in the attached commission, hereby certify that, in pursuance of said commission, I did, on the 21st day of March, 1931, call and cause to come before me, at my office in the Goodhue Building, at Beaumont, in the state of Texas, the said witness, Bolton H. Possien, and that the said witness, after having been first duly sworn, did testify and answer to written interrogatories propounded to him by Edward P. Totten, Solicitor for Complainant, as set down above his signature, and that the answer of said witness is set down as near as might be in his own language, and that he subscribed his name thereto in my presence after having read the same.

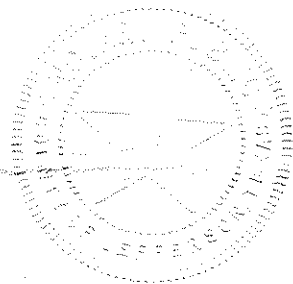
I further certify that I am neither of counsel nor of kin to any of the parties to this suit and that I am in no manner interested in the result thereof.

Witness my hand this 21st day of March, 1931.

*Wm. O. Bowers Jr.*

COMMISSIONER

*Notary Public Jefferson County, Texas*



The State of Alabama, {  
Baldwin County

CIRCUIT COURT

To William O. Bowers, Jr.,

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 Bolton H. Possien,

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

Bolton H. Possien;

is Complainant and

Anna Lee Possien,

Defendant,

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

Witness 12th, day of March, 19 31.

COMMISSIONER'S FEE, \$

WITNESS' FEES, \$

REGISTER

NO. \_\_\_\_\_

**The State of Alabama**  
**BALDWIN COUNTY**  
**CIRCUIT COURT**

Bolton H. Possien,

Complainant—

vs.

Anna Lee Possien,

*Grand Mar 23rd 1931.*

*W. R. Bowers, Jr.*

Defendant—

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

Hon. William O. Bowers, Jr.,

**WITNESSES:**

Bolton H. Possien.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 926

Vacation

Term, 1951

Bolton H. Possien

, Complainant

vs.

Anna Lee Possien

, 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.

No. 926.....

Page.....

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

Bolton H. Possien.....

vs.

Anna Lee Possien.....

REQUEST FOR DEGREE IN  
VACATION

FILED March 24th..... 1931



Register

RECORDED IN..... RECORD

VOL..... PAGE.....

Register

BOLTON H. POSSIEN, Complainant, IN CIRCUIT COURT, IN EQUITY,  
vs. of

ANNA LEE POSSIEN, Defendant. E. Oswald: BALDWIN COUNTY, ALABAMA

and I have lived here nearly all my life. I am over thirty years

old and have been acquainted with the family of Mr. Bolton H. Possien

and his wife Anna Lee POSSIEN THE DEPOSITION

was taken at the place where they now live. To my own knowledge

of Valentine H. Oswald xxxxxx

witnesses examined on behalf of the Complainant in the above entitled

cause which is pending in the Circuit Court of Baldwin County, Ala.

bama;

The said witnesses appeared before me at the time and place

hereinafter mentioned and, after having been first duly sworn to

speaking the truth, the whole truth and nothing but the truth, did testi-

fy and say as follows:

that the said Anna Lee Possien was the wife of the said Bolton H. Possien

and that she was the mother of the said Anna Lee Possien

and that she was the mother of the said Anna Lee Possien

and that she was the mother of the said Anna Lee Possien

and that she was the mother of the said Anna Lee Possien

and that she was the mother of the said Anna Lee Possien

and that she was the mother of the said Anna Lee Possien

and that she was the mother of the said Anna Lee Possien

and that she was the mother of the said Anna Lee Possien

Valentine H. Oswald



THE DEPOSITION OF VALENTINE H. OSWALT, of Fairhope, Alabama, taken in this cause in response to interrogatories propounded to him by Edward P. Totten, Solicitor for Complainant;

My name is Valentine H. Oswalt, I live at Fairhope, Alabama, and I have lived here nearly all my life. I am over thirty years of age. I am well acquainted personally with Bolton H. Possien and his wife Anna Lee Possien and have known them ever since they were married something over ten years ago. To my own knowledge Bolton H. Possien was a good worker and made ample and suitable provision for the support of his wife, Anna Lee Possien. I never heard of any mistreatment of any kind by Bolton H. Possien of his wife and, so far as I know, he was a good husband to her at all times. Mrs. Possien left her husband in the early part of the year 1928 and to my know<sup>ledge</sup> she has not lived with him since that date. I know nothing of the cause of her leaving her husband, of my own knowledge, but, from my acquaintance with the parties personally, believe that there was no fault on his part in connection therewith. Mrs. Possien, during my acquaintance with her, has never been a woman who seemed to feel any strong obligations regarding her husband or her home. Her separation from him or abandonment of him has been continuous for more than two years last past.

Valentine H. Oswalt

BOLTON H. POSSIEN, Complainant,

vs.

ANNA LEE POSSIEN, Defendant.

IN CIRCUIT COURT, IN EQUITY,

of

BALDWIN COUNTY, ALABAMA

CERTIFICATE OF COMMISSIONER

I, G. E. Perkins, the Commissioner named in the attached commission, hereby certify that, in pursuance of said commission, I did, on the 17th day of March, 1931, call and cause to come before me, at the office of Edward P. Totten, in the Fairhope Bank Building, at Fairhope, Alabama, the witness Valentine H. Oswalt and that the said witness, after having been first duly sworn, did testify in answer to oral interrogatories propounded to him by Edward P. Totten, Solicitor for Complainant, as set down above his signature, and that the answer of said witness is set down as near as might be in his own language and that he subscribed his name thereto in my presence after having read the same.

I further certify that I am neither of counsel nor of kin to any of the parties to this suit and that I am in no manner interested in the result thereof.

Witness my hand this 17th day of March, 1931.



COMMISSIONER

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

To 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 ----- Valentine H. Oswalt

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

Bolton H. Possien

Complainant

and -----

Anna Lee Possien,

Defendant,

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

Witness 12th, day of March 1931.

*[Signature]*

REGISTER

COMMISSIONER'S FEE, \$

1.00 Ph.

WITNESS' FEES, \$

NO. \_\_\_\_\_

**The State of Alabama**  
**BALDWIN COUNTY**  
**CIRCUIT COURT**

Bolton H. Possien

Complainant

vs.

Anna Lee Possien

*Given over 12/93/*

*J. M. Harrison*

Defendant

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

G. E. Perkins,

**WITNESSES:**

BOLTON E. POSSIEN, Complainant,

vs.

ANNA LEE POSSIEN, Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

AMENDED BILL OF COMPLAINT.

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

Your orator, by leave of court,  
files this amended bill of complaint, respectfully showing unto your  
Honor as follows:

That your orator and the Defendant  
are each over the age of twenty one years, are bona fide residents  
of Baldwin County, Alabama, were intermarried at Mobile, Alabama,  
on December 13th, 1917, and ever since have been and now are lawful  
husband and wife.

That, for more than three years im-  
mediately preceding the date of the filing of this bill, your orator  
has been and now is a resident of Baldwin county, Alabama, at the  
town of Fairhope, therein.

That, in the month of March, 1928,  
the Defendant, without any just cause or excuse and without any  
fault on the part of your orator, wilfully and voluntarily aban-  
doned the complainant, and that such abandonment has been continu-  
ous from such time until the present, and that this abandonment of  
the complainant by the defendant has continued for more than two  
years next preceding the date of the filing of this bill of com-  
plaint.

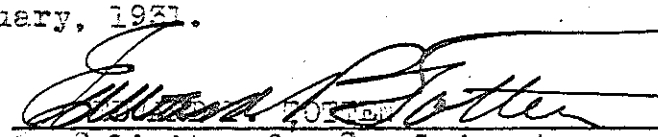
PRAYER FOR ~~XXXXXXXXXX~~ RELIEF:

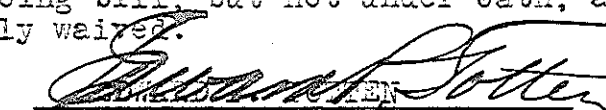
Your orator prays that, upon the final  
hearing of this cause, the bonds of matrimony now subsisting between  
himself and the said Anna Lee Possien may be wholly dissolved and  
that he be granted an absolute divorce therefrom, and that your orator  
may have such other and further relief as he may be entitled to in  
equity and good conscience, if he has in anywise prayed or asked  
amiss of this Honorable Court.

Dated this 18th day of February, 1931.

FOOTNOTE:

The Respondent above named is required to answer each and  
every allegation contained in foregoing bill, but not under oath, as  
answer under oath is hereby expressly waived.

  
Solicitor for Complainant

  
Solicitor for Complainant.

Bolton H. Possien,  
Complainant.

vs.

Anna Lee Possian,  
Defendant.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Comes the Defendant and Cross-Complainant in the above entitled cause and moves the Court to dismiss her Original Cross-bill in said cause.

W. H. Campbell  
Solicitor for Cross-Complainant.

STATE OF ALABAMA  
COUNTY OF BALDWIN

IN CIRCUIT COURT  
IN EQUITY

BOLTON H. POSSIEN, Complainant,

vs.

BILL OF COMPLAINT

ANNA LEE POSSIEN, Defendant.

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

Your Orator brings this bill of complaint against the Defendant and respectfully shows unto your Honor, as follows:

That your orator and the defendant are each over the age of twenty-one years, are residents of Baldwin County, Alabama, were intermarried at Mobile, Alabama, on or about the 15th day of November, 1916, and ever since have been and now are lawful husband and wife.

That there were born as the issue of said marriage two sons, Eugene and Bolton H., Jr., aged, respectively, eleven and three years.

That, on or about the 2nd day of July, 1930, the said Defendant committed adultery with one Rollie Leavens and that, at various and sundry times since such date, the said Defendant has committed adultery with the said Leavens.

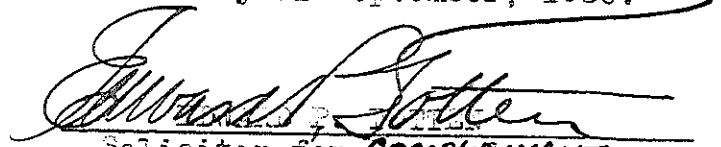
That the said Defendant is not a fit ~~xxfix~~ and proper person to have the care and custody of the said two minor children, and that your orator is a fit and proper person to have the care and custody of such children.

PRAYER FOR PROCESS AND FOR RELIEF:

The premises considered, your Orator respectfully prays that your Honor will take jurisdiction of the cause made by this bill of complaint, that the said Anna Lee Possien may be made party respondent hereto by the usual process of this Honorable Court, 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; and your Orator further prays that, upon the final hearing of this cause, the bonds of matrimony now subsisting between himself and the said Anna Lee Possien may be wholly dissolved and that he may be granted an absolute divorce therefrom, and, further, that by the decree and judgment of this Honorable Court your Orator may be awarded the full and complete care, custody and control of the two minor children, Eugene and Bolton H., Jr., and that your orator may have such other and further relief as he may be entitled to in equity and good conscience, if he has in anywise prayed or asked amiss of this Honorable Court.

Dated at Fairhope, Ala., this 18th day of September, 1930.

  
Solicitor for **COMPLAINANT**

FOOTNOTE:

The Respondent above named is required to answer each and every allegation contained in the foregoing bill, but not under oath, as answer under oath is hereby expressly waived.

  
Solicitor for **COMPLAINANT**



Anna Lee Possien, )  
Cross-Complainant. )  
vs. )  
Bolton H. Possien, )  
Cross-Defendant. )

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

Comes Anna Lee Possien, Cross-Complainant in the above entitled cause,  
and not waiving the demurers heretofore filed in said cause, but expressly  
insisting upon the same, herewith files her Cross-Bill against Bolton H.  
Possien and alleges as follows:-

First: That Cross-Complainant is over the age of twenty-one years and  
is now and has been a bona fide continuous resident of Baldwin  
County, Alabama, for more than three years next preceeding the  
filing of this her Cross-Bill. That Cross-Defendant, Bolton H.  
Possien, is also over the age of twenty-one years and is a res-  
ident of Baldwin County, Alabama.

Second: Cross-Complainant further shows unto your Honor that she and  
Cross-Defendant were lawfully married on December 13, 1917,  
and lived together as man and wife in Baldwin County, Alabama,  
until February 12, 1928, when her said husband, Bolton H.  
Possien, without fault on her part and against her wishes, vol-  
untarily abandoned her bed and board, that his abandonment of her  
bed and board has been continuous from the date it occurred up  
to an inclusive of the present time, and since it occurred there  
has not been any marital intercourse between them. And this  
abandonment occurred for more than two years next preceeding the  
filing of her Cross-Bill in this case.

Cross-Complainant further shows unto your Honor that there is  
living, the issue of their unfortunate marriage, two children  
whose names and ages are as follows:-Eugene R. Possien age  
eleven years and Bolton H. Possien, Jr., age three years. That  
these children are in the custody and under the control of Cross-  
Complainat, and it would be to their interest for their custody  
and control to be awarded to her free from interference on the  
part of their Father.

Cross-Complainant further show unto your Honor that she has no separate estate, whereas, her husband is an able bodied man and possesses the faculties of making money and does make money out of his labor or his accumulations.

Wherefore, Cross-Complainant prays your Honor to refer to the Register of this Honorable Court to ascertain by Reference and report for confirmation what would be a suitable amount to allow her as alimony pendente lite including attorney's fee, Court Costs and permanent alimony after decree of divorce.

Cross-Complainant further prays your Honor that this be treated as her Cross-Bill against Bolton H. Possien, Complainant in the original bill filed against her, which is pending in this Honorable Court, and that he be made party Defendant hereto and required to plead, answer or demur to the same according to the Rules of Practice of this Honorable Court and within the time required by Law.

Cross-Complainant further prays your Honor upon the hearing hereof, to grant her permanent alimony, the custody and control of her minor children the issue of her unfortunate marriage, and to grant her such other, further and different relief that she may In Equity be entitled to receive, she will ever pray etc.

Amie E. Possien  
Cross-Complainant.

Mr. W. Joseph Davis  
Solicitor for Cross-Complainant.

Foot Note:

Cross-Defendant is required to answer each and every allegation of the foregoing Cross-Bill, but not under oath, his oath to the same being expressly waived.

Mr. W. Joseph Davis  
Solicitor for Cross-Complainant.

Anna Lee Possien,  
Cross-Complainant.

vs.

Bolton H. Possien,  
Cross-Defendant.

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

Comes the Defendant in the original bill heretofore filed, and  
Cross-Complainant in her Cross-Bill heretofore filed, and moves the Court  
for an order of reference to ascertain and report what would be a suitable  
amount to allow her as alimony pendente lite, including attorney's fee s  
and Court Cost.

William Lee

W. H. Thompson,  
Solicitors for Defendant and Cross-Complainant