F. F. NELSON ATTORNEY AT LAW Baldwin Building

ROBERTSDALE, ALABAMA

August 5, 1931

Mr. T. W. Richerson, Clerk Circuit Court Bay Minette, Alabama

Dear Mr. Richerson:

I am enclosing herewith a petition for divorce in the case wherein Duby Finch is plaintiff and Marl Finch defendant.

I understand that this Earl Finch will sign a waiver of summons. However, I am mailing you this retition and asking you not to issue summons on the same until you hear from mc in regard to it. It may be that we will have to make an affidavit and get service by publication, yet I have heard in a round about way that he would sign a waiver and we can proceed without having to go into advert sing and publication for summons. Please acknowledge receipt.

Sours very truly,

F. F. Meison Attorney-at-Law

FF0:VG

STATE OF ALABAMA County of Baldwin

NOTICE TO NON-RESIDENT Ruby Finch vs. Earl Finch The State of Alabama, Baidwin County, Circuit Court, in Equity.

This the 18th day of August, 1931.
In this cause it being made to appear to the Clerk of this Court by the affidavit of F. F. Nelson, attorney for Complainant, that the Defendant Earl Finch is a non-resident of the State of Alabama, and that service of summons amont he had in the State of Alabama.

cannot be had in the State of Alabama, and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it therefore, ordered that publication be made in The Baldwin News-Herald, a newspaper

published in Robertsdale and Fairhope, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Earl Finch, the said Defendant, to an-

swer to demur to the Bill of Complaint in this cause by the 21st day of September, 1931, or after thirty days there from a decree Pro Confesso may be taken against the said Fart Finch

T. W. RICHERSON

G.G.Stephenson, being first duly sworn, desposes and says that he is the publisher of THE BALDWIN COUNTY NEWS, a newspaper published every Thursday at Robertsdale, Baldwin County, Alabama, in the English language and of general circulation in said Baldwin County, Ala-
bama; that the notice hereto attached of
Notice to Non Resident
Ruby Finch Vs Earl Finch
was published in said newspaper for 4 consecutive weeks in the following issues:
Date of first publication Aug 20 193h Vol. 10 No. 19
Date of second publication Aug 27 1931 Vol 10 No 20
Date of third publication Sept 3 1931 Vol. 10 No. 21
Date of third publication Sept 3 1931 Vol. 10 No. 21 Date of fourth publication Sept 10 1931 Vol. 10 No. 22
And said affiant further states that these is no contract, agreement or
understanding between himself and the officer charged with the duty of advertising said notice in a newspaper, for any advantage, gain or profit to accrue to such officer, and that the sum charged for he publication of said notice is the actual, lowest, regular price for such advertisement.
Deepheuson
Subscribed in my presence and sworn to before me, this 10th day
of September , 1931.
Cost of Publication \$8.10
Cost of Affidavitt 25

\$ 8.35

Total

				The State	of Alabama,
	- <u></u>				or madama,
No.	965.			Belavin	County
Parl Fino	vs.			Circuit Cou	rt, in Equity.
				This the	til a day o
	<u> </u>			-)	, 1921
	In this cause it be	ing made t	o appear to t	be Clerk of this Court	· · · · · · · · · · · · · · · · · · ·
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hat the Defend	•	don.		· · · · · · · · · · · · · · · · · · ·	
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nd further, that	, in the belief of sa	aid Affiant	the Defe	ndant 18	over the ago of 91
nd further, that	, in the belief of sate	aid Affiant	the Defe		over the age of 21
nd further, that ears; it is, there obertsdale d in Bay Mines arl Finch	, in the belief of saferore, ordered that	aid Affiant publication , Alabama, the said	the Defe Baldwin h be made in the made in	the Part of the four consecutive	over the age of 21 ewspaper publisher weeks, requiring
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The State of Alabama, No. 985

Bal	dwin County.)			
: ' '		Ruby Fin	oh		Complainant
			vs.		ompanient.
	<u> F</u>	arl Finch			
decree pro confe Court is of opin IT IS, TH mony heretofore	esso and the testin ion that the Compl IEREFORE, Orde	nony as noted ainant is entit red, adjudged the Complain	by the Reg fled to the r and decree ant and De	ister; and upor relief prayed for ed by the Cour fendant be, an	Defendant on the Bill of Complaint, a consideration thereof, the or in said bill. It, that the bonds of matrid the same are hereby dis-
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It further	orderd, that the	saidRuby	Finch		
Court in this ca	use.			arriage, upon	the payment of the costs of
	ner ordered, that t				***************************************
			_		execution is returned "no
g		Earl Fin	ор.	• • • • • • • • • •	
It is furtl	ner ordered, adjud	ged and decre	ed that sai	d Ruby Fi	nch
	narry except to s after this date, a				xty days S he shall not
marry again exc	cept to said	Earl Fin	eh		
The compl	urther order ainant Ruby	ed, that; Finch be:	and is h	during t ereby.re s	he said pendency of appeal tored.to.her.maiden
	by Hodges,		1 1		
This	31 th day	of Oil	veen		1981
		4 4 T C	Judge	of the Circuit (Court of Baldwin County.
STATE OF Baldwin	ALABAMA, County.	}			Circuit Court, in Equity.
T	·			Register	of said Circuit Court of said
County, Alaban	na, do hereby cert	ify that the al	ove is a ful	l, true and o	correct copy of the decree
					192,
in the cause of					
					Complainant
			vs,	•	Defendent
	ecora in said Cour	υ •			Defendant
aay of			74		



No. 985.

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

Ruby Finch

DECREE OF DIVORCE.

Filed in office this...222

day of Mounteen , 1931

Register

E. O. M.

Moore Printing Co. :::: Bay Minette, Ala.

The State of Alabama, Baldwin County

CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY

To A	Any	Sheriff	of the	State	of.	Alabama	GREETING:
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Beldwin	Coun	ty, to be and	appear befor	e the Judge of	the Circuit Co
Baldwin County, exercising	Chancery	jurisdiction, w	ithin thirty	days after the	e service of Su
ns, and there to answer, ple	ad or demi	ır, without oat	h, to a Bill of	Complaint la	tely exhibited
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The state of the s	-				N.,
	ton Witness	•			
KU KU	by Fine			<u> </u>	· · · · · · · · · · · · · · · · · · ·
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Rarl Finch

Serve on Circuit Court of Baldwin County In Equity.

No.

SUMMONS
Ruby Finch

VS,

Earl Finch

By.

F.F. Nelson

Solicitor for Complainant.

Recorded in Vol.

The State of Alabama, BALDWIN COUNTY.

Executed this day of 193

by leaving a copy of the within Summons with

Defendant.

Sheriff.

Deputy Sheriff.

The State of Alabama, Baldwin County

CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY

WE COMMAN	ND YOU, That you					
	Earl	Fineh			•	
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	nd perform what said					
id Defendant shal	il in no wise omit, un endorsement thereo			iediately u	pon the exec	cution thereof.

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

by leaving a copy of the within Summons with day of 2 Shart Sheriff. Deputy Sheriff. Defendant. Sheriff. 193 The State of Alabama, BALDWIN COUNTY. Received in office this . Executed thisnax day of $\mathbf{B}\mathbf{y}$ Solicitor for Complainant. Circuit Court of Baldwin County In Equity. Page-SUMMONS Early Finch F.F. Nelson Ş. Earl Finch Rudy Finch Recorded in Vol. No.

STATE OF ALABAMA) COUNTY OF BALDWIN)

RUBY FINOH,

COMPLAINANT

VS

BARL FINCH,

RESPONDINET,

IN THE CHANCERY DIVISION CIRCUIT COURT, BALDIN COUNTY, ALABAMA IN EQUITY

TO THE HONORABLE FRACES M. HARE, JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY IN EQUITY humbly complaining your Oratrix, RUBY FINCH, brings her BILL OF COMPLAINT against EARL FINCH, as Respondent and respectfully shows.

COUNT ONE

That the Complainant and Respondent are each of the age of twenty-one years. That your Complainant is a bona fide resident of Baldwin County. Alabama and has been a resident of the State of Alabama for more than five years last past and of Baldwin County for one year next preceding the filing of this Bill of Complaint.

COUNT TWO

That the Complaintant and Respondent were married to each other at Pascagoula, Mississippion or about the 18th. day of July, 1925 and lived together as man and wife until about the 29th. day of June, 1928 when they separated for reasons hereinafter stated and have remained continuously apart from each other since that time.

COUNT THREE

That during the Spring of 1928 and in June up until their separation your Complainant and Respondent lived in and near the town of ELBERTA, ALABAMA as man and wife and that for some time preceding their separation the Respondent herein began paying attention to one NORA RAINVATER and their affections continued to grow so perceptable that it became common knowledge throughout the Community and on or about the 29th. day of June 1928 the Respondent together with the said NORA RAINVATER left the twon of ELBERTA, ALABAMA and the Respondent left his home and went away and your Complaintant understands and is ledd to believe that he, your Respondent, has been living with the said NORA HAINVATER, ever since in Acts of Adultery. Your Complaintant further understands that the Respondent acted unfairly and falsely, and unfaithfully to your Complainant in that he ran around with other women and that he stayed away from home at nights and that he had an ungovernable temper. And that by his acts and conduct Complainant is led to believe that he was unfaithful and untrue to his said wife.

COUNT FOUR

Your Complainant further shows to this Honorable Court that on or about the 29th. day of June 1928 the Respondent herein deserted the Complainant and ran away with the other woman and that since that time he has not supported, contributed, or helped to support your Complainant in any way. And she has been compelled to support herself by her daily work and the labor of her hands and that she has been compelled to live by such work as she could secure and by and through the assistance and generosity of friends.

Your Complainant further shows to the Honorable Court that the Respondent has in no way contributed or assisted her since his desertion or since he left and went away. And he has been away for the past two years last.

PRAYER FOR PROCESS

Therefore premises considered Complainant prays that your Honor will take jurisdiction of the cause made by this Bill of Complaint and that by proper process issue unto him out of this Court and that the said EARL FINCH be made a party respondent hereto and be required to answer each and all and every paragraph or Count and charges made against him from one to four, inclusive, in all things required by the rules and practices of thes Court.

PRAYER FOR RELIEF

Complainant further prays that your Honor will grant to her an absolute Divorce and further prays for such other and different relief as in equity and in good conscience be due her in the premises.

Ruly Frinch Complainant

Sounsel for Complainant

Footnote:--

Responant, EARL FINCH, is required to answer each and every allegations in the foregoing but his answer under oath thereto is hereby expressly waived.

F. J. Nelsone Solicitor

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STATE OF ALABARA ! GODERY OF BALLYON)

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ALUCATETY.

IN THE GHANGERY DIVISION CIRCUIT COURT, DALDIN COURTY, ALABAMA And the second

TO THE ROMORABLE PRACES A. HARD, JUDGE OF THE CINCULT COURT, BALDWIN COURTY-L IN EQUIPT Numbly complaining your Oracrix Profession, brings her BILL OF COURTAINLY against hast LARL Professional and respectively my Respondent and respectfully diction,

That the Complained of Alabama for appointent are each of the age twenty-one years. That your Tomplainent is a none fide resident of Beldwin County, Alabama and has been a recident of the State of Alabama for any of their five years lest past and of Saldwin County for one type next preceding the filling of this bill of Couple 15.

Chat the Complaint of and Ampointent were married to each other at resonantle. Miss supplies or shout the Loth. day of July, 1920 and 11ved tegether as say and wire usual mout the 20th. day of June, 1930 when they peparated for reasons hereinafter stated and have remained continuously apart from each other eince that time.

Officer properties

ingle during the Spring of 1998 and in June up until their separation your Complainant and Respondent lived in and near the town of ALEXETA, ALAMANA as man and wife and that for some time preceding their separation the Respondent became become paying attention to one NGBA RAINTAINS and Sheir affections continued to grew so perceptable that it became common knowledge throughout the Community and on or about the 20th. day of June 1920 the Respondent together with the said MONA RAINWATHN Lort too twon of MARRIA, ALADADA and the Respondent left his home and went away and your Gompleindent understands and is lede to believe that he, your Respondent, has been living with Mre seld STRE WAIDWATER, ever since in Acts of Adultery. Your Gompleintent further understands that We Respondent noted unfairly and felsely, and unfaithfully to your Compleinant in that he ran around with other women and that he slayed own from home at nights and that he had an ungovernable temper. And that by his gots and conduct Complainent is led to believe that he was unfaithful and untrue to his said wife.

GOUST JOUR

Tour Complainant Airther Shows to this Henorable Court that on or shout the 20th. day of June 1920 the Respondent berein descried the Complainant and ren away with the other woman and that since that time he has not supported, contributed, or helped to support your Complainant in any way. And the has been compelled to support herself by her dally work and the labor of new hands and that she has been compelled to live by such work as she could secure and by and through the esciptance and denorosity of friends.

Your Completeent farther shows to take Honorable Court that the Respondent has in an are-

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considered premiese considered Complainant prays that your monor will take jurisdiction of the comme made by this Sill of complaint and that by proper process leave unto him out of this Court and that the said MANG, FINCH be made a party respondent nersto and be required to enswer each and all and every paragraph or Count and charges made against him from one to four, inclusive, in all things required by the rules and practices of thes Court.

PRAYIN FOR RECTOR

Complainant further prays that your Monor will grant to her an absolute Divorce and further prays for such other and different relief as in equity and in seed conscience be due her in the premises.

Reely Funds

Counsel War four fairent

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Respondet. BAR. FIRSH, is required to gaswer each and every allegations in the foregoing but his enswer under outs thereto is nevely expressly waived.

F. F. Dieson

The State of Alabama,	CIRCUIT COURT, IN EQUITY.
Baldwin County.	No. 985 Vacation Term, 1931
Ruby Fine	h Complainant.
	h Defendant_
	•
	T.W.Richerson that the order of publi-
cation heretofore made in this cause, was publ	ished for four consecutive weeks, commencing on the
20th day of August,	1951_, in the Baldwin County News
a newspaper published in Robertsdale	Alabama, that a copy of said order was posted
at the Court House door in Baldwin	County, on the 20 th day of
August 192 31 , and	
	*** ******************************
And it now further appearing to the R	egister T.W.Richerson, that the said
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• • • • • • • • • • • • • • • • • • • •	***************************************
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	••••
having to the date hereof failed to demur, ple	ad to or answer the Bill of Complaint in this cause, it
is now, therefore, on motion of Complainant.	, ordered and decreed by the Register
T.W. Richerson that the Bill of Comp	plaint in this cause be, and it hereby is in all things
taken as confessed against the saidEarl_	Finch
	••••
	•••••••
This 22nd day of Octobe	r 1931  Miceway Register
	Mercennon Rogistar

The State of Alal	nama. 🚶 💛	CIRCUIT	COURT, IN EQUITY	<b>7.</b>
BALDWIN COUNTY.	<b>)</b>	_{No.} 985	Vacation	Term, 1921
	191a 171.5.4.28m			
	Ruby Finek	***************************************		Complainants
•	vs.			
	Earl Finch			Defendants
Matina is bounded as I form I	Da B C(	· Earl Fi	n ch	Doromania
Motion is hereby made for a l	Decree Pro Contesso ag	ainst	24 O12	
	·			Defendant
in the annexed stated cause, on the gr was made under the order of this Coun non-resident of the State of Alabama	rt; and it having been	shown by due proof	to the Court that sai	d Defendant is a
hereof.				
This 22nd day of	October	1931		
		11-	nola	<u> </u>
746 Code.		Tel		Soliciton

### RECORDED

STATE OF ALAE Baldwin Coun	
CIRCUIT COURT, IN	EQUITY.
Ruby Finch	
	Complainants
Vs.	
Earl Finch	
MOTION FOR DECR	
october 22nd,	181
	Register
Recorded in	Reco
l. Page	

No. 985 NECONDED Page

# The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

Ruby Finch

Barl Finch

DECREE PRO CONFESSO ON PUBLICATION

Issued October 22nd,

19**51** 

Register.

Recorded in ...

Record

Register.

Moore Printing Company, Bay Minette, Ala.

	·	Ruby Finch		COMPLAINANT	
	; •	vs.			
	Ĩ	Earl Finch		RESPONDENT	
T	T.W.Riche	rson			
I,					·
Register and	l Commissioner				
ve called and	caused to come be	fore me Ruby Fi	nch and I	Sama Boylington a	nd.
SERVÎNI	nzkany Jack B	oyington			
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* * * * * * * * * * * * * * * * * * *			₹ . 1		,
			nation, on the	23rdday of Octob	er_
<b>D.L.</b> , at the	e office of Regis	s cer		<u> </u>	
Bay Mine	tte	, Alabama, and	having first s	vorn said witness <b>@.</b> \$_to	speak
th, the whol	e truth, and nothing	g but the truth, the	said Rub	y Finch	· i
		1 41 1		A 11	•
		doth dep	ose and say a	s follows:	•

of June, 1928. He and I were living at Elberta, Baldwin County, Alabama in the Spring of 1928 and Earl Finch and Nora Rainwater were very affectionate to each other and it was commonly known that they were sweethearts, so about the 29th day of June, 1928 he left me and the next thing I knew he was with the Rainwater girl so they stayed around awhile and he took the Rainwater girl and went off to Mississippi, and they have been living together at various places ever since, besides all that he ran around with other women at the same time. I caught him at this and he wouldn't stay at home. Since the 29th day of June, 1928, the said Earl Finch has failed to contribute to my support, and I have been on the mercy of the world for my livlihood. Since he ran away with the other woman I have had to make my own living and have lived by the help of my friends and by here work ing and have lived by the help of my friends and by hard work. He has been gone away from me for over two years. No children were born to this marriage.

Ruby Fr

Mack Boyington, a witness in behalf of the Complainant

who being duly sworn, doth depose and say as follows:
My name is Jack Boyington. I have known Ruby Finch for eight years and Earl Finch for about five years. I knew them when they were living together as man and wife. I knew them I knew them at the time they were separated. I remember the time Earl Finch left for Mississippi with the Rainwater girl. I know that he also went with other girls. Earl Finch never supported Ruby Finch since I have known them. She supports herself by whatever work she can obtain from other people. Earl Finch has been gone for more than two years. They haven't lived together since the time they separated,

Mrs. Bammar Boyington, a witness in behalf of the Complainant who being duly sworn, doth depose and say as follows:
My name is Mrs. Bammar Boyington. I have known Ruby Finch for twenty years or more. I live close to her here/in Alabama. I have known her ever since she got married to Earl Finch. name was Ruby Hodges before she was married. W know that Earl Finch took this Rainwater girl and went to Mississippi and left her without support. She had to go to her sisters and has had to work for her support at whatever work she could find. Earl Finch has not contributed to her supportwhatever. He has been gone and has never been back since. He has been gone for two years or more.

WITNESSES TO SIGNATURE OF BAMMAR BOYINGTON:

Wheevery

I, T.W.Richerson	, as Register and Commissioner hereby certify
that the foregoing deposition on Cral Exami	ination was taken down in writing by me in the words
of the witnesses and read over to them	and they signed the same in the presence of
myself T.W.Richerson	
witness es or had proof made before me of the counsel or of kin to any of the parties to said can	have personal knowledge of personal identity of said he identity of said witness <b>es</b> ; that I am not of suse, or any manner interested in the result thereof. In envelope to the Register of said Court.
Given under my hand and seal, this	23rd day of October 19 31.  (L. S.)

Vol. Page Record	Filed October 23rd, 1931  RECORDED IN	Ruby Finch  COMPLAINANT  VS.  Earl Finch  RESPONDENT  ORAL DEPOSITION	The State of Alabama BALDWIN COUNTY IN CIRCUIT COURT, IN EQUITY
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