

The State of Alabama, {
Baldwin County. No. 1011.

Circuit Court, in Equity.

Earl Seeley,

Complainant.

vs.

Cassie Seeley,

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 committed by Defendant,

It further ordered, that the said Earl Seeley,

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 Earl Seeley, 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

Cassie Seeley,

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

during the said pendency of appeal

It is further ordered and adjudged that Earl Seeley the Complainant have the care, custody and control of William Hardy Seeley, a boy about seven years of age and Lillian Seeley a girl about 3 years of age... both born of this marriage, pending further orders of this Court,

This 1st day of January, 1922,

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

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NO. 1011.

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Earl Seeley,

vs.

Cassie Seeley,

DECREE OF DIVORCE.

Filed in office this 2nd
day of January, 1932
T. H. Richardson
Register.

E. O. M.

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

1011

state of Alabama,)
Baldwin County.)

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA.

In Equity.

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

Your Orator Earl Seeley, respectfully represents
and shows unto Your Honor as follows:

1. That he is bona fide resident of Baldwin County,
Alabama, residing at Bay Minette, Alabama, for a period of
more than three years immediately before the filing of this
bill for divorce, and that he is over 21 years of age.

That Cassie Seeley is a resident of Baldwin County,
Alabama, residing at Bay Minette in said County and is
over 21 years of age.

2. That your Orator and the said Cassie Seeley were
married during the year 1920 and lived together as man and
wife until December 8th, 1931, at which time the said Cas-
sie Seeley left your Orator; that just prior to her leaving
the said Cassie Seeley committed adultery with Gordon Wig-
gins in Baldwin County, Alabama, and that your Orator neither
connived or condoned the said offense.

The premises considered Your Orator prays Cassie
Seeley be made party respondent to this bill of Complaint
by the usual process of this Honorable Court; that such or-
ders, decrees and publications, be made on the said Cassie
Seeley as necessary to perfect service on her, 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.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your Honor will grant unto Orator an absolute divorce and will also grant unto Orator custody of his his two minor children, the said children being named William Hardy Seeley, age seven and Lillian Lenora, age 3, both of said children now being in charge of your Orator.

Orator further prays that if he is mistaken in the relief prayed for that Your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.

Earl Seeley
Complainant.

FOOT NOTE:

Respondent is required to answer each and every allegation contained in the foregoing bill of complaint, paragraph One and Two, inclusive, but not under oath, answer under oath being hereby expressly waived.

Earl Seeley
Complainant.

Handwritten signature or initials, possibly "H. D. Moore".

HENRY D. MOORE
Attorney at Law
Bryn Mawr, Pa.

Earl Seeley, : In the Circuit Court,
Complainant. : Baldwin County, Alabama.
vs : In Equity.
Cassie Seeley, :
Defendant. :

Comes Cassie Seeley, Defendant, in the Above Styled,
cause and for anser to the said Complaint, denies each
and every allegation contained therein and demand strict
proof of same. She waives service of Subpoena by the
Sheriff and notice to take testimony on oral examination
as well as the right to cross examine, and consent that
the said Cause be submitted for decree on note of testimony
made by the Register either in term time or vacation,
and without notice to me.

Dated this 28th day of December , 1931.

Witness:

J. B. Wilson

Louise Nettles

Cassie Seeley

The State of Alabama, { CIRCUIT COURT OF BALDWIN COUNTY,
Baldwin County } IN EQUITY

To Any Sheriff of the State of Alabama---GREETING:

WE COMMAND YOU, That you summon

CASSIE SEELEY

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

EARL SEELEY

against said

CASSIE SEELEY

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 26th day of

DECEMBER 1931

 Register.

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

RECORDED

Serve on CASSIE SEELEY

Circuit Court of Baldwin County
In Equity.

No. _____

SUMMONS

EARL SEELEY

vs.

CASSIE SEELEY

HENRY D. MOORE

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

The State of Alabama,
BALDWIN COUNTY.

Received in office this 28th
day of Dec. 1931

W. R. Stuart
Sheriff.

Executed this 28th day of
Dec. 1931

by leaving a copy of the within Summons with

Cassie Seeley
Defendant.

W. R. Stuart
Sheriff.

By J. B. Wilson
Deputy Sheriff.

8581 NOTE OF TESTIMONY

Earl Seeley

vs.

Cassie Seeley,

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,-----
Service on Defendant, Answer of Deft and testimony of Earl Seeley,..
and Martin Lucas,

and in behalf of Defendant upon

P. M. Phipps

Register.

RECORDED

No. 1011.

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

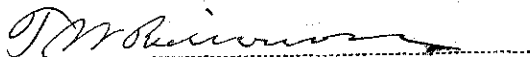
Earl Seeley

VS

Cassie Seeley,

NOTE OF TESTIMONY

Filed in Open Court this 30th
day of December, 1931. 192



Register

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 1011... Vacation..... Term, 19231.

Earl Seeley....., Complainant...

vs.

Cassie Seeley,....., 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 Henry D. Moorers,.....

..... 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.

Henry D. Moorers,.....
Solicitor for Complainant.

No. 1011.

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THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Earl Seeley

vs.

Cassie Seeley,

REQUEST FOR DECREE IN
VACATION

Dec 30th, 1931

FILED 192

D. W. Rice

Register

RECORDED IN RECORD

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Register

The State of Alabama
Baldwin CountyCircuit Court of Baldwin County, Alabama,
(In Equity)Earl Seeley,

COMPLAINANT

VS.

Cassie Seeley,

RESPONDENT

I, T.W. Richerson,

as Register and Commissioner

have called and caused to come before me Earl Seeley and Martin Lucas,

witness named in the requirement for Oral Examination, on the 29th day of December
1931, at the office of Register,
in Bay Minette, Alabama, and having first sworn said witness es to speak the
truth, the whole truth, and nothing but the truth, the said witnesses,

doth depose and say as follows:**Testimony of Earl Seeley:**

My name is Earl Seeley. I am a resident of Baldwin County, Alabama, and have lived in said County for more than three years next immediately before the filing of this bill for divorce. I am over 21 years of age. Cassie Seeley is my wife. She is over 21 years of age and is a resident of Baldwin County, Alabama. We were married during the year 1920 and lived together as man and wife until December 8th, 1931. At this time and several times before she had been out with Gordon Wiggins. I saw Gordon Wiggins pick up my wife on Hand Avenue after dark and take her away in the car. I saw Gordon Wiggins go to my house during the early part of December at night and stay at least 30 minutes. Gordon Wiggins carried my wife to Wayside Swimming pool and Gordon Wiggins put his hands all over her body. I told Wiggins not to go to my house any more about December 1st and two days afterward and while I had gone to work Wiggins went to my house one morning about day light.

Cassie Seeley and Gordon both in my presence admitted that they had been having sexual intercourse and that they had committed the act several times. Neither denied the act but frankly admitted same, in the presence of each other, and in my presence. Both admitted in the presence of Martin Lucas that they had sexual intercourse with each other. Wiggins was with my wife in our home constantly after I had warned him to stay away. This was in my home in Baldwin County, Alabama.

Cassie Seeley and myself have two children--a boy names William Hardy Seeley age seven and Lillian Seeley age 3 a girl. Both are now in my custody and charge and I am able to care for and keep them. Cassie Seeley has no property whatever and has no home to care for the children. She is not proper person to have charge and custody of the said children. Cassie

Seeley, my wife, told me that she did not care for me and that she loved Gordon Wiggins; that Gordon Wiggins had put his arms around her lots of time and told her he loved her and that she beleived he was sincere and that she loved him and would not give him up.

Earl Seeley

Testimony of Martin Lucas:

My name is Martin Lucas. I know Earl Seeley and Cassie Seeley his wife. I saw Cassie Seeley in the car with Gordon Wiggins at night about the 1st of December, 1931. They were going out of the Town of Bay Minette together or the car was going out of Town. Gordon Wiggins admitted to me that he had been out with Mrs. Cassie Seeley several times.

Martin Lucas

ORAL EXAMINTAION

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 signed the same in the presence of myself and Myself and H.D.Moorer, 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 29th day of December, 1931.

T.W. Richerson

(L. S.)

No. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Hart Seeley,

COMPLAINANT

VS.

Cassie Seeley,

RESPONDENT

ORAL DEPOSITION

Filed December 29th, 1931.

T.W. Richerson, Register.

RECORDED IN

Record

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