

TO THE HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN CHANCERY:

Comes your Complainant, ELLIE MOORE, and humbly complain-
ing against ROBERT MOORE, respondent, respectfully represents and
shows unto your Honor as follows:

FIRST:

That both your complainant and the respondent are resi-
dents of Baldwin County, Alabama, and have been for more than
three years next preceding the filing of this bill of complaint;
that the respondent is over twenty-one years of age; that your
complainant is twenty years of age.

SECOND:

That your complainant and the respondent are wife and
husband, having intermarried at West Palm Beach, Florida, on June
6, 1927.

THIRD:

That they lived together as husband and wife until on,
to-wit, December 27, 1929, when the respondent voluntarily went
away and left your complainant, and that he has remained away
voluntarily and continuously since that time.

WHEREFORE, the premises considered, your complainant
prays that your Honor will by proper process make the said Robert
Moore party respondent to this bill of complaint, requiring him
to plead, answer or demur to the same within the time and under
the penalties prescribed by law and the practice of this Honor-
able Court.

Your complainant further prays that upon a final hear-
ing of this cause your Honor will grant unto her a decree of ab-
solute divorce, forever barring the bonds of matrimony existing
between her and the said Robert Moore; that your Honor will give
and grant unto her such other, further, different or general re-

lief as she may be in equity and good conscience entitled to receive.

And as in duty bound your complainant will ever pray.

Callie Moore
Complainant.

Beebe & Stagg
Solicitors for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation of the foregoing Bill of Complaint, from Paragraphs "FIRST" to "THIRD" inclusive, but not under oath, oath being expressly waived.

Callie Moore
Complainant.

Beebe & Stagg
Solicitors for Complainant.

ELIIE MAE MOORE,
Complainant,

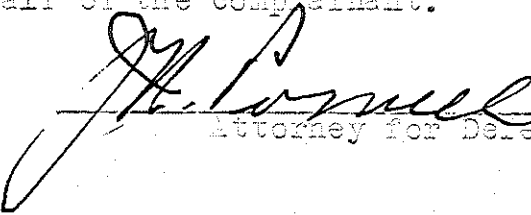
vs.

ROBERT L. MOORE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Comes the defendant, Robert L. Moore, by and through his attorney, J. N. Powell, and waives notice of the time of taking testimony on behalf of the complainant, the right to cross-examine the complainant's witnesses, and agrees that the cause may be forthwith submitted for final decree upon the pleadings and proof on behalf of the complainant.


Attorney for Defendant.

#1074
~~RECORDED~~

Ellie Moore
v

Robert Moore

Hawaii

Feb'y 28th 1933

W. Richardson
Register

Ellie Moore

vs.

Robert Moore

vs.

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,-----
Testimony of Ellie Moore and Addie Byrd, waiver of the respondent

and in behalf of Defendant upon answer

J. W. Richardson

Register.

No. 1079

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Ellie Moore

VS

Robert Moore

NOTE OF TESTIMONY

Filed in Open Court this 2nd

day of March 19233

J. M. Richardson

Register

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

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Robert Moore,

Hartselle, Alabama,

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

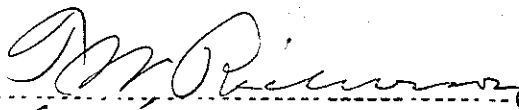
Ellie Moore,

against said Robert Moore,

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 23rd, day of

August, 1932

 Register

Original
SERVE ON.....

Circuit Court of Baldwin County
In Equity.

No.

SUMMONS

Ellie Moore,

vs.

Robert Moore,

Hartselle, Alabama.

Beebe & Hall,

Solicitor for Complainant

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

..... 192

by leaving a copy of the within Summons with

Defendant,

Sheriff.

By
Deputy Sheriff.

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

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Robert Moore,

Hartselle, Alabama,

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

Ellie Moore,

against said Robert Moore,

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 23rd day of

August, 1932

T. W. Richerson Register

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

Copy
RECORDED

SERVE ON.....

**Circuit Court of Baldwin County
In Equity.**

No.

SUMMONS

Ellie Moore,

vs.

Robert Moore,

Beebe & Hall,

Solicitor for Complainant

Recorded in Vol. Page

RECORDED

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within Summons with

Defendant.

Sheriff.

By
Deputy Sheriff.

ELLIE MAE MOORE,
Complainant,

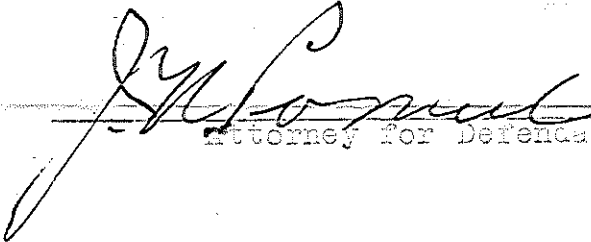
vs.

ROBERT L. MOORE,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Comes the defendant, Robert L. Moore, by and through
his attorney, J. W. Powell, and denies each and every allegation
contained in the complainant's bill of complaint, and demands
strict proof thereof.


Attorney for Defendant.

1079

RECORDED

Ellie Moore

r

Robert Moore

Answer

Filed Feb'y 18th 1933

W. Richardson
Register

ELLIE MOORE,
Complainant,
vs.
ROBERT MOORE,
Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA. IN EQUITY.
NO. 1079.

This cause coming on to be heard, was submitted on the original bill of complaint on behalf of the complainant, answer and agreement of the respondent, and testimony as noted by the Register, and upon consideration thereof, the Court is of the 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 the respondent be and the same are hereby dissolved and the complainant is forever divorced from the respondent on the ground of voluntary abandonment.

It is further ORDERED that the said Ellie Moore be and she 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 Ellie Moore pay the costs herein taxed, for which execution may issue.

It is further ORDERED, ADJUDGED AND DECREED that the said Ellie Moore shall not again marry, except to the said Robert Moore, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not marry again, except to the said Robert Moore, during the pendency of the appeal.

It is further ORDERED, ADJUDGED AND DECREED that the said Robert Moore be and he is hereby permitted to again contract marriage upon the payment of costs in this cause.

Dated at Bay Minette, Alabama, on this the 2 *nd*

day of March, 1933.

R. W. Hare
Judge of the Circuit Court of
Baldwin County, Alabama.

Original
RECORDED

ELLIE MCSNE,
Complainant

VS

ROBERT MOORE,
Respondent

FINAL DECREE

Filed Mar 2nd 1933
T.W. Reenan
Register

day of March, 1933.

A. M. Hare
Judge of the Circuit Court of
Baldwin County, Alabama.

The State of Alabama }
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

Ellie Moore

COMPLAINANT

VS.

Robert Moore

RESPONDENT

I, T. W. Richerson

as Register and Commissioner—

have called and caused to come before me Ellie Moore and Addie Byrd

witnesses named in the Requirement for Oral Examination, on the 24 day of February

1935, at the office of T. W. Richerson

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

truth, the whole truth, and nothing but the truth, the said Ellie Moore

doth depose and say as follows:

My name is Ellie Moore. I am over twenty-one years of age and a resident of Baldwin County, Alabama. I have been a resident of Baldwin County, Alabama, for more than three years next preceding the filing of the bill of complaint in this cause. The respondent Robert Moore is a resident of Baldwin County, Alabama, and over twenty-one years of age.

The respondent and I were married at West Palm Beach, Florida on the 8th day of June, 1927. We lived together as husband and wife until on, to-wit: December 27th, 1929, when the respondent voluntarily went away and left me, and has remained away voluntarily and continuously since that time. The respondent has not since he went away and left me contributed anything toward my support and well being. I have had to depend entirely on my friends and my own effort for a livelihood.

I did not give the said respondent any reason for leaving me and have not in any way been the cause of his remaining away.

Ellie Moore

Addie Byrd a witness for the complainant being first duly sworn deposes and says:

My name is Addie Byrd. I am a resident of Bay Minette, Baldwin County, Alabama. I have known the complainant Ellie Moore for about three years. She has been in Bay Minette, Baldwin County, Alabama, all the time I have known her.

I have occasions to see her regularly from time to time, almost every day, and know that she has been living with her Mother, until her Mother's death, and since that time she has been living with her

brother. I know of my own personal knowledge that she has not been living with the respondent Robert Moore. She has to depend on her Brother and friends for a living. Robert Moore has not been here to see her during the time I have known her, so far as I know.

Mrs Adeline Byrd

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 presence of myself and Hubert M. Hall 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 2th day of February 19 33

_____(L. S.)

No. 1079 Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

ELLIE MOORE
COMPLAINANT

vs.

ROBERT MOORE
RESPONDENT

ORAL DEPOSITION

Filed FEBRUARY 24th., 19 33

T. W. Richerson, Register
RECORDED IN

Record

Vol. _____ Page _____

Register