

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

Comes your complainant, CAVA VERSACI, and humbly complaining against MITCHELL VERSACI, respectfully represents and shows unto your Honor as follows:

FIRST:

That she is a bona fide resident of Baldwin County, Alabama, eighteen years of age, and has been such resident of Baldwin County, Alabama, for three years next preceding the filing of this Bill of Complaint; that the respondent, Mitchell Versaci, is over the age of twenty-one years, a resident of Baldwin County, Alabama, but is at present temporarily sojourning at 284 St. Emanuel Street, Mobile, Alabama.

SECOND:

That your complainant and respondent were married at Moss Point, Mississippi, in April, 1930, and that they lived together until in June, 1932.

THIRD:

That in June, 1932, and on various other occasions the respondent choked, cursed and abused your complainant; that your complainant, from the conduct of respondent, has every reasonable apprehension to believe and does believe that if she should continue to live with him he will continue his acts of violence to her person, which are attended with danger to her life and health.

FOURTH:

That there was born to the marriage of your complainant and the respondent one child, a girl now fifteen months old named Joanne Versaci, who is now and has been all of her life with her mother, your complainant.

FIFTH:

That the respondent, on account of his conduct and his mode of living, is not a suitable person to have the custody,

care and control of the said child, but that your complainant is the proper person to keep the said child and have the custody, care and control of her.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper process make the said Mitchell Versaci 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 Honorable Court.

Your complainant further prays that upon a final hearing of this cause your Honor will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the respondent, Mitchell Versaci; that your Honor will further decree that she have the care, custody and control of the said child, Joanne Versaci.

Your complainant also prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive. And as in duty bound she will ever pray.

Cava Versaci  
Complainant.

Beale & Stace  
Solicitor for Complainant.

FOOT NOTE:

The respondent is required to answer each and every allegation contained in the foregoing Bill of Complaint from Paragraph FIRST to FIFTH inclusive, but not under oath, oath being hereby expressly waived.

Cava Versaci  
Complainant.

Beale & Stace  
Solicitor for Complainant.

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 Mitchell Versaci,

264 St Emanuel St, Mobile Ala.

of Mobile 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

Cava Versaci,

against said Mitchell Versaci,

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 25th day of

October 1932

T. W. Richerson Register.

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

33/2

Original

Serve on

Circuit Court of Baldwin County  
In Equity.

No. \_\_\_\_\_

SUMMONS

Cava Versaci,

vs.

Mitchell Versaci,  
264 St Emanuel St  
Mobile Ala.

Beebe & Hall,  
Solicitor for Complainant.

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

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RECORDED  
The State of Alabama,  
BALDWIN COUNTY.

Received in office this \_\_\_\_\_

day of \_\_\_\_\_ 193 \_\_\_\_\_

Sheriff.

Executed this 21 day of

Nov. 193 2

by leaving a copy of the within Summons with

Mitchell Versaci

Defendant.

H. H. Hulcomb, Jr.

Sheriff.

By A. V. Farmer  
Deputy Sheriff.

The State of Alabama,  
Baldwin County.

{ No. 1084 CIRCUIT COURT IN EQUITY.

*Sava Versai*

Complainant

VS.

*Mitchell Versai*

Defendant

Motion is hereby made for a Decree Pro Confesso against

*Mitchell Versai*

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23 day of December 1932

*Beale & Hall*

Solicitors

RECORDED

No. ....

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**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

VS.

**MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE**

Filed Dec 23 1932

J. M. Reelmon

Register.

Recorded in ..... Record,

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Register.

The State of Alabama, {  
Baldwin County.

No 1084

CIRCUIT COURT, IN EQUITY

CAVA VERSACI

Complainant

vs.

MITCHELL VERSACI

Defendant

In this cause it appears to the REGISTER

that a Summons requiring the Defendant MITCHELL VERSACI

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon MITCHELL VERSACI

was served upon HIM by the Sheriff of MOBILE County, Alabama, on the 21 day of November 19 32

And the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of HON. H.M.Hall,

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said MITCHELL VERSACI

Defendant aforesaid.

This 27th day of December 19 32



Register.

No. 1084

Page

**The State of Alabama,**  
Baldwin County

**Circuit Court In Equity**

CAVA VERSACI

vs.

MITCHELL VERSACI

**Decree Pro Confesso On  
Personal Service.**

Issued December 27th, 1932

*J. M. Williams*

Register.



The State of Alabama }  
Baldwin County }

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

Cava Versaci

COMPLAINANT

VS.

Mitchell Versaci

RESPONDENT

I, T. W. Richerson

as Register and Commissioner

have called and caused to come before me Cava Versaci and Mrs. Frank Dolive

witness <sup>es</sup> named in the Requirement for Oral Examination, on the 30 day of December

1932, at the office of T. W. Richerson, Register

in Bay Minette, Alabama, and having first sworn said witness <sup>es</sup> to speak the truth, the whole truth, and nothing but the truth, the said Cava Versaci

doth depose and say as follows:

My name is Cava Versaci. I am a bona fide resident of Bay Minette, Baldwin County, Alabama, and have been for more than three years next preceding the filing of the bill of complaint in this cause. I am eighteen years of age.

The respondent Mitchell Versaci is a resident of Baldwin County, Alabama, over twenty-one years of age. He is temporarily sojourning in Mobile, Mobile County, Alabama.

The respondent Mitchell Versaci and I were married at Moss Point, Mississippi, in April 1930. We lived together as man and wife until in June 1932.

During the second week in June 1932, the Respondent cursed, abused and ~~chided~~ me; that on various other occasions prior to that time he had cursed and abused me. I had tried to get him to quit abusing me, but it was of no avail. His conduct was at the time I left him such that I could not stand to live with him. I was under a continuous dread that he was going to do me harm. He was running around all the time and drinking liquor, and every time he would come in, he abused me and threatened me. His conduct was such that I had every reason to believe and did believe that if I continued to live with him, he would continue his conduct towards me, and I feared that he would continue to abuse me, and that he would carry out his threats, and do further violence to my person, which would necessarily be attended with danger to my life and person.

The respondent at the time I had to leave him and for some time prior thereto was suffering with a horrible disease, contracted from running around with lewd women. My life and health and the life and health of our young baby was under a continuous dread. I just could not live with him.

We have one baby, a girl now <sup>sixteen</sup> ~~sixteen~~ months old, Joanna Versaci, who is now and has been all her life living with her mother your complainant. I am able to care for and protect and provide for her. The respondent for the reasons hereinabove set out is not a suitable person,

and is not capable of taking and caring for the said child. He has not provided anything toward the support of me and the baby since June.

We were living in Bay Minnettem Baldwin County, Alabama, at the time I had to leave him.

Cava Versaci

Mrs. Frank Dolive a witness for the Complainant, being duly sworn deposes and says: That she is the mother of Cava Versaci, the Complainant in the above styled cause; That Cava is now and has been since in June 1932 living with her in her home at Bay Minette, Alabama.

That the respondent himself told me on several occasions that he was suffering with a horrible disease and was under the Doctor's care.

My daughter Cava reported to me on various occasions that Mitchell was mistreating her and that she couldn't continuw to live with him. I talked with him, and also with his mother about the way he was treating Cava. He told me that it was all his fault that Cava had had to leave him. His mother told me that she had talked with him on various occasions about the way he was treating Cava, but that she couldn't do anything with him.

The respondent has not provided anything toward the support of Cava and the Baby since Cava was forced to leave him.

Mrs Frank Dolive

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<sup>es</sup> and read over to them and they signed the same in the presence of myself and H. 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<sup>es</sup>; 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 30 day of December 1932.

T. W. Richerson (L. S.)

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**The State of Alabama**  
**BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

Eva Vreace

VS.  
COMPLAINANT

Mitchell Vreace

RESPONDENT

**ORAL DEPOSITION**

Filed December 30th, 1932

T. W. Richerson, Register  
RECORDED IN

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Register

8381 NOTE OF TESTIMONY

CAVA VERSACI,

Complainant,

vs.

MITCHELL VERSACI,

Respondent.

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,  
Summons served on the Respondent; Motion for decree pro confesso  
on personal service; Decree pro confesso on personal service;  
Testimony of Cava Versaci and Mrs. Frank Dolive;

and in behalf of Defendant upon

*J. M. Reservoir*  
Register.

No. 1084.

RECORDED  
THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

CAVA VERSACI,

Complainant,

vs

MITCHELL VERSACI,

Respondent.

NOTE OF TESTIMONY

Filed in Open Court this 30<sup>th</sup>

day of Dec 1922

*J. M. Peterson*  
Register

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 1084

Term, 192

CAVA VERSACI

, Complainant.

vs.

MITCHELL VERSACI

, Defendant.

To T. W. RICHMOND, 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 BEEBE & HALL

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.

Beebe & Hall

Solicitor for Complainant.

No. 1084

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THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

*Carva Kuraca*

vs.

*Michael Kuraci*

REQUEST FOR DECREE IN  
VACATION

FILED

*Dec 30th*

1932

*J. M. Harrison*

Register

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Register

CAVA VERSACI,

Complainant,

vs.

MITCHELL VERSACI,

Respondent.

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

NO. 1084.

This cause coming on to be heard, was submitted upon the pleadings and proof as noted by the Register.

The Court, upon consideration thereof, 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 cruelty.

It is further ORDERED that the respondent pay the costs herein taxed, for which execution may issue.

It is further ORDERED, ADJUDGED and DECREED that the said complainant be restored her maiden name, that is, Cava Dolive.

It is further ORDERED that the complainant be and she is hereby permitted to again contract marriage upon the payment of costs of court in this cause.

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

It is further ORDERED, ADJUDGED and DECREED that the complainant shall have the custody, care and control of Joanne Versaci, subject to the further orders and jurisdiction of this court.

Dated at Monroeville, Monroe County, Alabama, on this the  
27th day of January, 1933.

*F. W. Hare*

Judge of the Circuit Court, Baldwin Co.



STATE OF ALABAMA.

BALDWIN COUNTY.

I, T. W. Richerson, Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that the above is a full, true and correct copy of the Decree rendered by said Court on the \_\_\_\_\_ day of January, 1933, in the case of Cava Versaci, complainant, vs. Mitchell Versaci, respondent, as appears of record in said court.

WITNESS my hand and seal of said Court, this the \_\_\_\_\_ day of January, 1933.

\_\_\_\_\_  
Register.

CAVA VERSACI,  
Complainant,

VS

MITCHELL VERSACI,  
Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY NO. 1084

This cause coming on to be heard, was submitted upon the pleadings and proof as noted by the Register.

The Court, upon consideration thereof, 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 cruelty.

It is further ORDERED that the respondent pay the costs herein taxed for which execution may issue.

It is further ORDERED, ADJUDGED and DECREED that the said complainant be restored her maiden name, that is Cave Dolive.

It is further ORDERED that the complainant be and she is hereby permitted to again contract marriage upon the payment of costs of court in this cause.

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

It is further ORDERED, ADJUDGED and DECREED that the complainant shall have the custody, care and control of Joanne Versaci, subject to the further orders and jurisdiction of this court.

Dated at Monroeville, Monroe County, Alabama, on this the 3rd day of January, 1933.

F. W. Hare  
Judge of the Circuit Court, Baldwin  
County.