

JILES PHILLIPS,  
COMPLAINANT.

VS.

INEZ PHILLIPS,  
DEFENDANTS

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IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA.

IN EQUITY.

TO THE HONORABLE FRANCIS W. HARE, JUDGE  
OF THE TWENTY FIRST JUDICIAL DISTRICT OF ALABAMA. IN EQUITY.

Your orator, Jiles Phillips, humbly complaining  
of the defendant, Inez Phillips, in a matter of divorce  
represents and shows unto Your Honor as follows:

1. That both he and the defendant are residents  
of Baldwin County, Alabama and have<sup>SO</sup>/resided for more than  
three years next preceding the filing of this bill of com-  
plaint. That your orator is over the age of twenty-one years  
and that the defendant is over the age of eighteen years.

2. That your orator and the defendant were  
married on, to-wit, the 24th day of November, 1930 in  
Baldwin County, Alabama and lived together as man and  
wife until on, to-wit, the 5th day of January, 1931 in  
Baldwin County, Alabama.

3. That on, to-wit, the 5th day of January,  
1931, without just cause or good excuse the defendant  
voluntarily abandoned your orator and has not returned  
to live with him as his wife.

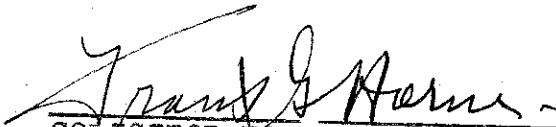
P R A Y E R F O R P R O C E S S .

To the end that equity may be had in the  
premises Your orator prays that the said Inez Phillips  
be made party defendant to this Bill of Complaint, that  
a subpoena be issued and served on her, requiring her to  
plead, answer or demur to the foregoing Bill of Complaint  
within the time prescribed by law and the practice of this  
Honorable Court.

P R A Y E R   F O R   R E L I E F .

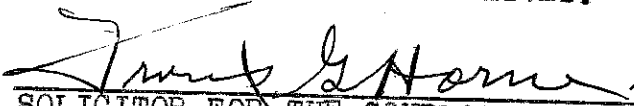
Premises considered, Your Orator prays that upon a final hearing of this cause, Your Honor will grant to him an absolute divorce from the said Inez Phillips. Your orator further prays that Your Honor will grant to him the right to marry again should he so desire.

Your Orator prays such other, further and general relief as in equity may seem just and meet, and your orator will ever pray, etc.

  
SOLICITOR FOR THE COMPLAINANT.

FOOTNOTE:

DEFENDANT IS REQUIRED TO ANSWER EACH PARAGRAPH OF THE FOREGOING BILL OF COMPLAINT NUMBERED FIRST SECOND AND THIRD (1, 2 and 3), BUT NOT UNDER OATH; ANSWER UNDER OATH BEING HEREBY EXPRESSLY WAIVED.

  
SOLICITOR FOR THE COMPLAINANT.

The State of Alabama, BALDWIN County

CIRCUIT COURT, IN EQUITY

at BAY MINETTE, ALABAMA

JILES PHILLIPS

vs.

INEZ PHILLIPS

Comes INEZ PHILLIPS

the person named as defendant in this cause, and for answer to the bill herein says she denies each and every allegation therein, and demands strict proof of the same. She also waives service by the Sheriff of subpoena on said bill, a copy of the interrogatories filed in the cause, notice of the filing of them, waives the ten days allowed by law to cross them, the right to cross them, and consents that the cause be submitted in vacation to the Judge for decree in vacation on note of testimony to be made by the Register. And further request that in case a decree is granted she be given the right to again marry Inez Phillips, Defendant.

THE STATE OF ALABAMA, BALDWIN COUNTY.

Before me Oran Simon

a ~~Justice of the Peace~~ (or Notary Public) (or Register) in and for said State and County, hereby certify that Inez Phillips

whose name is signed to the foregoing answer to a certain Bill of Complaint filed on the 23rd

day of February A.D. 1934, wherein Jiles Phillips

is complainant and Inez Phillips

is defendant, and who is known to me to be the identical person named as defendant in the Bill of Complaint in this cause, acknowledged before me on this day that being informed of the allegations on the Bill of Complaint filed against her by Jiles Phillips

, who is her husband, she signed the answer hereto attached voluntarily on the day the same bears date.

And I further certify that she signed the said answer in my presence.

Given under my hand and seal this 1st day of March, A.D. 1934

Oran Simon  
~~Justice of the Peace~~  
Notary Public, Baldwin  
County, Alabama.

The State of Alabama, { No. 27 CIRCUIT COURT IN EQUITY  
Baldwin County }

Jiles Phillips Complainant

vs.

Inez Phillips 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 abandonment

It is further ordered, that the said Jiles Phillips and Inez Phillips be, and they are hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Jiles Phillips 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 Inez Phillips

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

during the said pendency of appeal

This 8<sup>th</sup> day of March 1934

J. W. Hare  
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 \_\_\_\_\_ 9, 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 \_\_\_\_\_, 19\_\_\_\_

Register

The State of Alabama, Baldwin County.

IN CIRCUIT COURT, IN EQUITY

Jiles Phillips

Complainant

vs.

Inez Phillips

Defendant

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and the evidence having been taken and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant by his Solicitors of Record, now files with the Register of said Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Handwritten signature of Frank S. Harne

Solicitor for Complainant.

.....Jiles Phillips.....

vs.

.....Inez Phillips.....

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, ~~Decree Pro Confesso~~, Request for Decree in Vacation, Commission to Take Deposition, Deposition of Mrs. J. L. Phillips, and Jiles Phillips, and Mrs. Mollie Bryars,

and in behalf of Defendant upon *answer & waiver*

*M. A. Stone*

Register.

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The State of Alabama, BALDWIN County

IN THE CIRCUIT COURT, IN EQUITY

JILES PHILLIPS Complainant

vs.

INEZ PHILLIPS Defendant

To ~~G. W. PHILLIPS~~

*J. Cecil Barron*

residing at Atmore, State of Alabama.

one or more to take the deposition:

Know ye, That reposing confidence in your integrity, skill and ability, I have appointed you

Commissioner Jiles Phillips to take the depositions on oral examination of

Mrs. J. L. Phillips and Mrs. Mollie Bryars

material witnesses for the Complainant

in a cause now pending in the Circuit Court, in Equity, of said County, wherein

Jiles Phillips is Complainant, and

Inez Phillips is Defendant.

And hereby authorize you to call and cause to come before you the said witness es at

such time and place as you shall appoint, and their deposition on oath to take, touching

their knowledge of the matter in controversy, and the said deposition s when so taken

by you shall be subscribed by said witness es and certified under your hands and seals, and with

this commission shall be returned to me.

Witness my hand, this the 5<sup>th</sup> day of March, 1934

*M. A. Stone*, Register.

The State of Alabama, BALDWIN County

IN CIRCUIT COURT, IN EQUITY

Giles Phillips Complainant

vs.

Inez Phillips Defendant  
Commissioner

Oral examination before the ~~Register~~ of the following witnesses:

Giles Phillips, Mrs. J. L. Phillips and Mrs. Mollie Bryars

who reside in Alabama, said examination being conducted in Atmore Alabama,

on this the \_\_\_\_\_ day of \_\_\_\_\_, and there being present

The commissioner and the said witnesses.

Giles Phillips

The said \_\_\_\_\_ being first sworn to speak the truth, the whole truth, and nothing but the truth,

testified as follows: I am the complainant in the above styled cause. I

Am a bona fide resident of Baldwin County, Alabama and I am over

the age of twenty-one years and the defendant is a bona fide res-

ident <sup>of Baldwin County,</sup> and is over the age of eighteen years. I have resided in

Baldwin County for more than three years next precedin the filing

of the bill of complaint in this case. the defendant and I were

married in Baldwin County, Alabama on, ~~that~~, the 25th day of

November, 1930. We lived together as man and wife until on or

about the 1st day of January, 1931 at which time the defendant,

without just cause or good excuse abandoned me and she has never since

returned to live with me as my wife.

*Giles Phillips*



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The State of Alabama,

Baldwin COUNTY.

Circuit Court, in Equity

Jiles Phillips vs. Complainant.

Inez Phillips Defendant.

Request for Decree in Vacation

Filed 7th day of March, 19 34

Register.

Recorded in

Record

Vol. Page

*M. A. Stone*, Register.

*[Handwritten signature/initials]*

The State of Alabama

\_\_\_\_\_ COUNTY

IN CIRCUIT COURT, IN EQUITY

vs. Complainant,

Defendant.

Deposition Taken Before Register on Oral Examination

Deposition of \_\_\_\_\_  
for \_\_\_\_\_

Filed \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Published by order of the Court, \_\_\_\_\_

day of \_\_\_\_\_, 19\_\_\_\_

Register.

27

~~RECORDED~~

No. 27

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Jiles Phillips

VS

Inez Phillips

NOTE OF TESTIMONY

Filed in Open Court this 7th

day of March 19234

*W. A. Street*  
Register

**RECORDED**  
*1934*

27

No. 27

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.  
Baldwin County, Ala.

Jiles Phillips

VS

Inez Phillips

DECREE OF DIVORCE

Filed in office this 18<sup>th</sup>

day of March, 1934

W. D. Stone  
Register.

E. O. M.

~~RECORDED~~  
1954

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The State of Alabama

Baldwin COUNTY.

CIRCUIT COURT, IN EQUITY

Jiles Phillips,

vs.

Inez Phillips

Answer and Waiver of Defendant

VERIFIED BY AFFIDAVIT

Filed this 8-16 day of

August, 1954

Wm. D. Stone  
Register.

27

RECORDED

27

Jesse Phillips

vs

Jessie Phillips

Filed Oct. 28<sup>th</sup> 1934

Wm. D. Stone  
Register.

FRANK G. HORNE  
ATTORNEY AT LAW  
ATMORE, ALA.

**The State of Alabama,**

Baldwin COUNTY.

**In Circuit Court, in Equity**

Jiles Phillips  
vs. Complainant

Inez Phillips

Defendant

**COMMISSION TO TAKE DEPOSITIONS ON  
ORAL EXAMINATION**

Commissioners

J. Cecil Barron

Witnesses

Jiles Phillips, Mrs. Jiles

Phillips, Mrs. Millie Bryars,