The State of Alabama Baldwin County.	No CIRCUIT COURT IN EQUITY.
ARTHUR GREEN	Complainant
	vs. Complainant
EZZIE SUNDAY GREEN	Defendant
In this cause it appears to the C	ourt
that a summons requiring the Defendant.	Mzzie Sunday Green
	The state of the s

	••••••
	••••••

appear and demur. plead to or answer t	the Bill of Complaint in this cause within thirty days
fter the service of said Summons upon	
	iff of Escambia County, Alabama, on the
6th_day of	
•	

	B 4 B 8 B 8 B 8 B 8 B 8 B 8 B 8 B 8 B 8
And the said Defendant having failed	to demur, plead to or answer the said Bill of Complaint
	n of Hybart, Heard & Chason, as Attorney
	omplaint in this cause be and it hereby is in all things
•	· · · · · · · · · · · · · · · · · · ·
	Ezzie-Sunday Green
	•••••

	Defendant_aforesaid.
This 9th day of	July 19 34
<i>'</i>	Register.

STATE OF ALABAMA,	1	-	CIRCUIT COURT, IN E	QUITY.
Baldwin County.	- S	No.	In Vacation	Term, 19 34
ARTHUR GREEN				, Complainant
		vs.		, Complement
EZZIE SUNDAY GREEN				Dofondant
	·• ••••		 i- i	, Defendant

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 Hybart, Heard & Chason 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.

Register

RETHUR GREEN, Defendant This cause, coming on to be heard at this Term, was submitted upon the Bill of Compared per confesso and the testimony as noted by the Register; and upon consideration thereto runt is of opinion that the Complainant is entitled to the relief prayed for in said bill. It is further ordered, chart the said decreed by the Court, that the bonds of any interestore estating between the Complainant and Defendant be, and the same are hereby dived, and the complainant is forever divorced from the Defendant, on account of abandoment It is further ordered, that the said Arthur Green and Ezzie Sunday Green, and thayAFB hereby permitted to again contract marriage, upon the payment of the cost unit in this case. It is further ordered, that the said Arthur Green We costs herein taxed, for which execution may issue, and if such execution is returned operty found," then execution for such costs may issue against the said Bzzie Sunday Green It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie sunday Green It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and becreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie. It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie sunday Green Arthur Green and Ezzie Sunday G	A THIN FOT TO A THICKNEY		
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Complainant,
-vsEZZIE SUNDAY GREEN,
Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE STATE OF ALABAMA

BALDWIN COUNTY.

TO THE HONORABLE THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AND THE HON. FRANCIS W. HARE, JUDGE THEREOF, SITTING IN EQUITY:-

Comes your Complainant, Arthur Green, and exhibits this his Bill of Complaint in this cause for divorce against Ezzie Sunday Green, and shows unto this Honorable Court as follows:-

FIRST:

That both Complainant and Respondent are over the age of twenty-one years; that your Complainant is a bona fide resident of Baldwin County, Alabama, residing at Bon Secour, Alabama, and has been such a bona fide resident for more than three years next immediately preceding the filing of this Bill of Complaint. That the Respondent is a resident of Escambia County, Alabama, residing near Flomaton.

SECOND:

That your Complainant and the Respondent were married on heretofore, to-wit, 1927, and lived together as man and wife until, to-wit, February 28th, 1929, at which time Respondent voluntarily deserted and abandoned your Complainant. That such desertion took place more than two years before the filing of this Bill of Complaint and has continued without interruption.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, the Complainant prays that all necessary notices, orders and decrees be issued to make the above named Ezzie Sunday Green party defendant, requiring her to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes. That upon final hearing hereof your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between your Complainant and the Respondent be forever dissolved

(page one)

(page two)

and that your Complainant be again permitted to contract the marriage relationship should he so desire. Should your Complainant be mistaken in the relief prayed for that there be granted to him such other, further and different relief to which he is in equity and good conscience entitled; and as in duty bound he will ever pray.

with Guns Complain ant.

FOOT NOTE:-

Respondent is required to answer each and every paragraph of the foregoing Bill of Complaint, from 1st to 2nd, inclusive, but not under oath, as oath is hereby expressly waived.

Ayburt Hear Share.

BILL OF COMPLAINT.

ARTHUR GREEN,

Complainant,

... S.

EZZIE SUNDAY GREEN,

Respondent.

IN THE CIRCUIT COURT-IN EQUITY STATE OF ALABAMA

BALDWIN COUNTY.

, 1954

HYBART, HEARD

BAY MINETTE, ALABAMA

A.C.A.C.C.C.	Elizabeth		
			THE STATE OF ALABAMA, BALDWIN COUNTY
••••••••••••••••••••••••••••••••••••••	vs.	Complainan	
	unday green	1 5	IN EQUITY, CIRCUIT COURT OF BALDWIN COUNTY.
7.		Respondent:	
This caus	e is submitted i	in behalf of Compla	tinant upon the original Bill of Complaint,
Motion for	Decree Pro	Confesso on	Personal Service; Decree Pro Con-
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resso on P	ersonal sel	rvice; Reques	for Decree in Vacation; . Testimony
of Arthur	Green, and I	I. C. Richburg	·
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9thday of....

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The	State of Ala Baldwin County		} No	C	IRCUIT	r Cou	RT IN EC	QUITY.
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w.,			vs.			,		
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EZZIE	SUNDAY GREEN					·	Defend	lant
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Motion	is hereby made for a	Decree Pro Con	ıfesso ag	ainst E Z	zie Su	mday_	Green	
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							Defe	ndant
in the ab	ove stated cause, on t	he ground that r	nore tha	n thirty da	ys have	elapsed	since se	rvice of
summon	s upon said Defendan	t; and that s	aid sum	nons was d	uly serv	ed acco	ording to	law, and
that said	Defendantha Sf	ailed to demur,	plead to	or answer	he Bill o	of Comp	laint in th	is cause
to this d	ate.	•						•

July 19 34.

Hyfarl, Heards Cheen Solicitor.

The State of Alabama Baldwin County

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

	ARTHUR GREEN		COMPLAINANT
		vs.	
	EZZIE SUNDAY GREE	N,	RESPONDENT
I, —	Mary F. Green		
	md. Commissioner	• .	
have called ar	nd caused to come before me	Arthur Green and	H. C. Richburg
			· ,
	amed in the requirement for Ora		
193_4_, at the	e office of Hybart, Hear	d & Chason,	
in Ba	y Minette, , Alabama	a, and having first sworn	said witness es to speak the
truth, the who	ole truth, and nothing but the	truth, the saidArt	hur Green and H. C.
Richburg		doth depose and sa	y as follows:

The State of Alabama, Baldwin County

CIRCUIT COURT

ToMa	ry F. Green		· · · · · · · · · · · · · · · · · · ·	<u></u>		· · · · · · · · · · · · · · · · · · ·
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KNOW YE:	That we, having full	l faith in your	prudence ar	nd competency,	have appointe	ed you Com
missioner, and by the	se presents do authori	ze you, at suc	h time and i	place as you ma	y appoint, to c	all before you
and examine	Arthur Green	and H. C	. Richbu	ırg		
BIG CAMPILIO						
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Court of Baldwin Cou	inty, of said State, v	wherein		-		·
						
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		*	<u> </u>			_ Defendant
on oath to be by you	administered, upon	them				
to take and certify th	ne deposition_s_ of the	e witness es	and return t	he same to our	Court, with	all convenien
speed, under your ha	nd.			•		
Witness	9th day of	July		19 34		,
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			-//	<u>, c4</u>	Direc	REGISTER
COMMISSIONER'S FEE, \$_						
WITNESS' FEES, \$					•	

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

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Escambia County, to be and appear before the Judge of the Circuit Co	Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Suns, and there to answer, plead of demur, without oath, to a Bill of Complaint lately exhibited Arthur Green, gainst saidEzzie Sunday Green,
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I,	Mary F	. Green		as	Tagiske u n	e Commissioner	hereby certify
that the	e foregoing de	eposition _s o	n Oral Exami	nation was	taken down	in writing by n	ne in the words
of the w	vitness .es an	d read over to	them	and the	y signe	ed the same in t	the presence of
myself	and	-					
at the ti	me and place	e herein ment	ioned; that l	have perso	nal knowled	lge of personal	identity of said
witness	es or had	proof made	before me of	the identity	of said wi	itness es ; tha	t I am not of
counsel	or of kin to a	any of the par	ties to said o	ause, or any	manner int	erested in the	result thereof.
I	enclose the s	aid Oral Exa	mination in a	n envelope t	o the Regist	ter of said Cour	t.
G	liven under n	ny hand and s	eal, this 9tì	aday of_	July		3 <u>4.</u> .
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Register	Record	Register.	ORAL DEPOSITION	RESPONDENT	COMPLAINANT	YTI	Page THE STATE OF ALABAMA, BALDWIN COUNTY
14	rđ.	er.		, H	7		

My name is Arthur Green. I am the Complainant in that certain cause now pending in the Circuit Court of Baldwin County, Alabama, Equity Side, styled "Arthur Green, Complainant, vs. Ezzie Sunday Green, Respondent". I was on the 19th day of May, 1934, over the age of twenty-one years, and had been a bona fide resident of Baldwin County, Alabama, residing at Bon Secour, Alabama, for more than three years next immediately preceding the filing of the Bill of Complaint. Ezzie Sunday Green was on the 19th day of May, 1934, over the age of twenty-one years, and was, and still is, a resident of Escambia County, Alabama, residing near Flomaton. I was married to Ezzie Sunday Green on, to-wit, December 15th, 1927, and we lived together as man and wife until towit, February 28th, 1929, at which time Ezzie Sunday Green volunwithout justification or legal cause. tarily deserted and abandoned me/ We have not lived together as man and wife since that time. This desertion or abandonment took place more than two years before the filing of the Original Bill of Complaint in this cause, and has continued without interruption.

ather Green

My name is H. C. Richburg. I am over the age of twentyone years and a bona fide resident of Baldwin County, Alabama,
residing at Bon Secour. I am acquainted with both Arthur Green
and Ezzie Sunday Green, having known them for more than nine
years. I was in school with Ezzie Sunday Green, and have been
associated with each of them from time to time during the past
nine years. I know of my own knowledge that they were married
on, to-wit, December 15th, 1927, and that they lived together as
man and wife until, to-wit, February 28th, 1929, at which time
Ezzie Sunday Green voluntarily deserted and abandoned Arthur
Green, and that they have not lived together since that time
as man and wife. I am not related to either Arthur Green or
Ezzie Sunday Green by blood or marriage.

The	State	of	Ala	abama	ιļ
	Baldwin	n C	ount	y	- \

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

*	at .			
-	ARTHUR GREEN		COMPLAINANT	
		· VS.		
	EZZIE SUNDAY GREE	n,	RESPONDENT	
•				
I,	Mary F. Green			
as Rogistor-a	nd Commissioner	- HALLPING		
homo called and	d caused to come before me _	Arthur Green	n and H. C. Richt	ourg
mave caned and	d charged to come before me —			
•	med in the requirement for Or		•	•
193 <u>4</u> , at the	office of <u>Hybart, Hear</u>	rd & Chason,		
in B ay	Minette, Alabam	a, and having fi	rst sworn said witness es	sto speak the
truth, the who	le truth, and nothing but the	truth, the said _	Arthur Green	and H. C.
Richburg_		doth depos	e and say as follows:	