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The State of Alabama,
Baldwin County.

No. _____ CIRCUIT COURT IN EQUITY.

ARTHUR GREEN

Complainant

vs.

EZZIE SUNDAY GREEN

Defendant

In this cause it appears to the Court
that a summons requiring the Defendant Ezzie Sunday Green

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 Ezzie Sunday Green

was served upon her by the Sheriff of Escambia County, Alabama, on the
6th day of June 19 34

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 Hybart, Heard & Chason, as Attorneys
for Complainant.

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 Ezzie Sunday Green.

Defendant aforesaid.

This 9th day of July 19 34

My. A. Stone

Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTG CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. In Vacation Term, 1934

ARTHUR GREEN , Complainant

vs.

EZZIE SUNDAY GREEN , Defendant

To M. A. STONE, , 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 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.

..... *Hybart, Heard & Chason*
Solicitor for Complainant.

The State of Alabama, }
Baldwin County

No. _____ CIRCUIT COURT IN EQUITY

ARTHUR GREEN,

vs.

Complainant

EZZIE SUNDAY GREEN,

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 Arthur Green and Ezzie Sunday Green 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 Arthur Green 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 Ezzie Sunday Green.

It is further ordered, adjudged and decreed that the said Arthur Green and Ezzie Sunday Green shall not again marry except to ~~said~~ each other until sixty days after this date, and that if an appeal is taken within sixty days — ~~they shall not~~ they shall not marry again except to ~~said~~ each other during the said pendency of appeal.

This 10th day of July 19 34.

A. 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 _____, 19 _____,

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

ARTHUR GREEN,
Complainant,
-vs-
EZZIE 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 Sun-
day 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 be-
tween your Complainant and the Respondent be forever dissolved

(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.

Walter Green
Complainant.

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.

Hybart, Reed & Brown
Solicitors for Complainant.

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RECORDED

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BILL OF COMPLAINT.

ARTHUR GREEN,

Complainant,

-vs-

IZZIE SUNDAY GREEN,

Respondent.

IN THE CIRCUIT COURT-IN EQUITY

STATE OF ALABAMA

BALDWIN COUNTY.

Filed May 19th, 1934

Wm. R. Stone
Registrar.

LAW OFFICES

HYBART, HEARD
& CHASON

BAY MINETTE, ALABAMA

...ARTHUR GREEN.....

.....

.....

vs. Complainant,

...EZZIE SUNDAY GREEN,.....

.....

..... Respondent:

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,.....

Motion for Decree Pro Confesso on Personal Service; Decree Pro Confesso on Personal Service; Request for Decree in Vacation; Testimony of Arthur Green and H. C. Richburg.....

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.....

and in behalf of Defendant upon.....

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.....

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THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

M. A. Stone

Register.

The State of Alabama,
Baldwin County.

} No. CIRCUIT COURT IN EQUITY.

~~ARTHUR GREEN~~ Complainant

vs.

~~EZZIE SUNDAY GREEN~~ Defendant

Motion is hereby made for a Decree Pro Confesso against Ezzie Sunday Green

..... 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 9th day of July 19 34.

..... *Hyatt, Heard & Chen* Solicitor.

The State of Alabama }
Baldwin County

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

ARTHUR GREEN

COMPLAINANT

VS.

EZZIE SUNDAY GREEN,

RESPONDENT

I, Mary F. Green

as ~~Register and~~ Commissioner

have called and caused to come before me Arthur Green and H. C. Richburg

witnesses named in the requirement for Oral Examination, on the 9th day of July
1934, at the office of Hybart, Heard & Chason,

in Bay Minette, Alabama, and having first sworn said witnesses to speak the
truth, the whole truth, and nothing but the truth, the said Arthur Green and H. C.
Richburg doth depose and say as follows:

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To Mary F. Green

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Arthur Green and H. C. Richburg

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

Arthur Green

Complainant

and

Ezzie Sunday Green

Defendant,

on oath to be by you administered, upon them to take and certify the deposition s. of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 9th day of July 19 34

J. A. Sims

REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

SUMMONS--ORIGINAL.

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 Ezzie Sunday Green

Resides near Flomaton, Escambia County, Alabama

of Escambia 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 Arthur Green,

against said Ezzie Sunday Green,

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, M. A. Stone, Register of said Circuit Court, this 19 day of

May 1934

M. A. Stone Register

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

ORAL EXAMINATION

I, Mary F. Green as ~~Register and~~ Commissioner hereby certify that the foregoing depositions 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 _____ 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 9th day of July 1934.

Mary F. Green (L. S.)

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No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

VS.

RESPONDENT

ORAL DEPOSITION

Filed July 9, 1934

M. F. Green, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

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 to-wit, February 28th, 1929, at which time Ezzie Sunday Green voluntarily deserted and abandoned ^{without justification or legal cause.} 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.

Arthur Green

My name is H. C. Richburg. I am over the age of twenty-one 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.

H. C. Richburg

The State of Alabama }
Baldwin County

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

ARTHUR GREEN _____ COMPLAINANT

VS.

EZZIE SUNDAY GREEN, _____ RESPONDENT

I, Mary F. Green _____

as ~~Register and~~ Commissioner _____

have called and caused to come before me Arthur Green and H. C. Richburg _____

witnesses named in the requirement for Oral Examination, on the 9th day of July
1934, at the office of Hybart, Heard & Chason, _____

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

truth, the whole truth, and nothing but the truth, the said Arthur Green and H. C. _____

Richburg _____ doth depose and say as follows: