

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

TO THE HONORABLE A. E. GAMBLE, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA----IN EQUITY.

Your Oratrix, Rebecca Lambert, respectfully
represents and shows unto your Honor as follows:

FIRST.

That she is a bona fide resiednt citizen of the
County of Baldwin and State of Alabama, residing at Gateswood,
Alabama. That she has been a resident of the State of Alabama
for a period of more than the last three preceeding years next
before the filing of this bill, and that she is over the age
of twenty-one years of age.

That Tillman Lambert is over the age of twenty-
one years and is a resident of the State of Alabama, residing
at Summerdale, Alabama.

SECOND.

That your Oratrix and the said Tillman Lambert were
lawfully married more than ten years ago and lived together as
husband and wife until to-wit: Aug. 15th, 1917, at which time they
separated and since the said time have not lived together as husband
and wife. That the said Tillman Lambert on or about August 15th, 1-
1917, voluntarily abandoned the bed and board of the said Rebecca
Lambert, and has often refused to return and live with her; that
your Oratrix have made several efforts to get him to return.

THIRD.

That your Oratrix is informed and beleives and on such
information and beleif alleges and states the truth to be that the
said Tillman Lambert is the owner of valuable property in the County
of Baldwin and State of Alabama, the value and location of same is
unknown to your Oratrix; that the said Tillman Lambert has property
valued at approximately \$7000.00.

PRAYER FOR PROCESS.

The premises considered, your Oratrix respectfully prays that the said Tillman Lambert, defendant, be made party respondent to this bill of complaint by the usual process of this Honorable Court, and that he be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause your Honor will grant unto your Oratrix an absolute divorce from the said Tillman Lambert;

That your Honor will make and enter a decree, allowing this Complainant alimony pendente lite, reasonable Attorneys' fees pendente lite, permanent Attorneys' fees and permanent alimony out of the estate of said Tillman Lambert.

That, if your Complainant is mistaken in the relief above prayed for that your Honor will grant unto her such other, further, different and general relief as in justice and equity she may be entitled to receive, under the allegation and proof, she will ever pray, etc.

PAGE & MOORE,
Solicitors for Complainant.

FOOT NOTE: The Respondent is required to answer each and every allegation of the foregoing Bill of Complainant from FIRST to THIRD, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORE,
Solicitors for Complainant.

Rebecca Lambert, X
Complainant. :
vs :
Tillman Lambert, X
Defendant. X

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.

In Equity.

Comes the Complainant, Rebecca Lambert, and leave
of the court first had and obtained amends the Original Bill
as filed in the above styled cause by striking the paragraph
"THIRD" from same.

PAGE & MOORE,

Solicitors for Complainant.

Filed November
28th, 1919

J. W. Rice
Registrar

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 Tillman Lambert

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

Rebecca Lambert

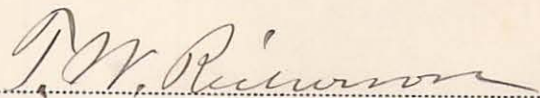
against said

Tillman Lambert

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 26th day of August

1919.



Register.

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

original

Serve on.....
CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.....

SUMMONS.

Rebecca Lambert

vs.

Tillman Lambert

Sumnerdale

page and Moorer.

Solicitor for Complainant.

Recorded in Vol..... Page.....

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THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this *26th*

day of *August* 191*9*

W.R. Starnes
Sheriff.

Executed this *28th* day of

August 191*9*

by leaving a copy of the within Summons with

Tillman Lambert
Defendant

W.R. Starnes
Sheriff

By
Deputy Sheriff.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 193. CIRCUIT COURT, IN EQUITY.

Rebecca Lambert Complainant
vs.
Tillman Lambert Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso

and 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

her 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 said

Rebecca Lambert is forever divorced from the said
Tillman Lambert

for and on account of
Abandonment,

as alleged in said Bill of Complaint;

It is further ordered, that the said Rebecca Lambert be, and he 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 Rebecca Lambert, 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 Tillman Lambert

It is further ordered, adjudged and decreed that said Rebecca Lambert, shall not again marry except to said Tillman Lambert, until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Tillman Lambert, during the pendency of said appeal.

This 20th day of January, 1920, 191

John D. Leigh
Judge of the Circuit Court of Baldwin County.

THE 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 191, 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 191

Register.

No. 193.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Rebecca Lambert

vs.

Gillman Lambert

DECREE OF DIVORCE.

Filed in office this

21st

day of

January

1920

J. M. Dickerson

Register.

E. O. M.

Recorded in

minutes

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Rebecca Lambert Complainant
vs.
Tillman Lambert Defendant

Oral examination before the Register of the following witnesses:

Rebecca Lambert and H. A. Allen

who reside in Alabama, said examination being conducted in Baldwin Alabama,
on this the 3rd day of November, and there being present

The said Rebecca Lambert being first sworn to speak the truth, the whole truth and nothing but the truth,
testified as follows:

My name is Rebecca Lambert. I am over twenty-one years of age and have been a resident of Baldwin County, Alabama all of my life, residing at Gateswood, Alabama. Tillman Lambert is over twenty-One years of age and a resident of Baldwin County, Alabama for a period of more than ten years. Tillman Lambert and myself were married morethan ten years ago and lived together as man and wife until about August 15th, 1917 at which time the said Tillman Lambert voluntarily abandoned ~~yearx~~ me bed and board and have not lived with me since; he often refused to return and live with me after I made several efforts to get him to return.

Rebecca Lambert

Sworn and subscribed to before me this 3rd day of
November, 1919.

H. A. Allen
Register
Clerk of the Circuit Court.

Testimony of H. A. Allen:

My name is H. A. Allen. I am the brother of Mrs. Rebecca Lambert. Tillman Lambert has not lived with Mrs. Rebecca Lambert since about August 15th, 1917. Both of them have been residents of Baldwin County, Alabama for a number of years and more than the last three years next preceeding the filing of this bill.

H. A. Allen

Sworn and subscribed to before me this 3rd day of November, 1919.

J. W. Whinnon Register

I, D. W. Beckwith, as Register

hereby certify that the foregoing deposition..... on oral examination taken down by me in writing in the words of the witness en and read over to them and they signed the same in the presence of myself, at the time and place herein mentioned; that I have personal knowledge of the personal identity of the said witness en, or had proof made before me of the identity of said witness en; that I am not of counsel or of kin to any of the parties to said cause; or in any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court, and placed the same on file in my office.

Given under my hand and seal this the..... day of....., 19.....

(L. S.)

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
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.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....
.....	days' attendance at \$1.50 per day	\$.....

REGISTER'S FEES.

.....	days at \$1.50 per day	\$.....
.....	words at 20 cents per hundred

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Asseca Laupt

vs. Complainant,

William Laupt

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of _____

for _____

Filed *3* day of *Nov*, 19*17*

Published by order of the Court, _____

day of _____, 19____

D. W. McKeown
Register.

THE STATE OF ALABAMA,

Baldwin County.

No. CIRCUIT COURT IN EQUITY.

Rebecca Lambert Complainant

vs.

Tillman Lambert Defendant

Motion is hereby made for a Decree Pro Confesso against.....

Tillman Lambert 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..... 28th day of November, 19.19.

Page Turner
Solicitor.

Rebecca Lambert

vs.

Tillman Lambert

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,
and testimony of 2 witnesses for complainant.

Decree from case 6.

and in behalf of Defendant upon

T. W. Rice

Register

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No. 193.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Rebecca Lambert

vs.

Tillman Lambert.

NOTE OF TESTIMONY.

Filed in Open Court this 16th

day of January, 1920, 191

T. J. McInnis
Register

THE STATE OF ALABAMA,
BALDWIN COUNTY.

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CIRCUIT COURT, IN EQUITY.

No. 193. Spring Term, 19²⁰

Rebecca Lambert

Complainant.....

vs.

Tillman Lambert,

Defendant.....

To T.W. Richerson, 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 Page and Moorer,

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.

Page and Moorer.

Solicitor for Complainant.

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No. 193.

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

Rebecca Lambert.

vs.

Tillman Lambert.

REQUEST FOR DECREE IN
VACATION.

Filed January 16th, 1920. 191

D. W. Rice

Register

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Register

THE STATE OF ALABAMA,
Baldwin County.

No. 193.

CIRCUIT COURT, IN EQUITY.

Rebecca Lambert Complainant
vs.

Tillman Lambert Defendant

In this cause it appears to the Register,
that a Summons requiring the Defendant Tillman Lambert

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 Tillman Lambert

was served upon him by the Sheriff of Baldwin County, Alabama, on the
28th, day of August 1919, 19, 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
Page and Mooer, Solicitor for Complainant.

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as con-
fessed against the said Tillman Lambert,

Defendant aforesaid.

This 1st day of December 1919.

W. H. McQuinn

Register.

THE STATE OF ALABAMA,

Barbour County.

CIRCUIT COURT, IN EQUITY.

Rebecca Lambert

vs.

William Lambert

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued Dec 1st 1919

D. W. McIlwain
Register.

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Register.