

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT,
IN EQUITY.

TO THE HONORABLE, JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT,
BALDWIN COUNTY, ALABAMA.---In Equity.

Your Orator, Carey Pleasant, respectfully represents
and shows unto your Honor as follows:

FIRST.

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

That Martha Pleasant is over the age of twenty-one
years and resides at Calvert, Alabama.

SECOND.

That your Orator and the said Martha Pleasant were
lawfully married more than ten years ago and lived together
as man and wife; that the said Martha Pleasant more than two
years before the filing of this bill voluntarily abandoned
the bed and board of your Orator and has not lived with him
since.

PRAYER FOR PROCESS.

The premises considered, your Orator respectfully
prays that the said Martha Pleasant be made party respondent
to this bill of complaint by the usual process of this Hon-
orable Court, and that he be required to demur, plead to or
answer the same within the time and under the penalties as pro-
vided 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 Orator and absolute divorce from the said
Martha Pleasant; that your Orator will again be allowed to
contract marriage; that if your Orator is mistaken in the re-

lief prayed that your Honor will grant unto him such other, further, different and general relief as he may in justice and equity be entitled, he will ever pray, etc.

P A G E & M O O R E R ,
Solicitors for Complainant.

FOOT NOTE:

The Defendant, M^rtha Pleasant, is required to answer each and every allegation contained in the forgoing Bill of Complaint, numbered from "FIRST" to "SECOND", both inclusive, but not under oath, answer under oath being hereby expressly waived.

P A G E & M O O R E R ,
Solicitors for Complaint.

Carey Pleasant,)
Complainant.)
vs)
Martha Pleasant,)
Defendant.)

In the Circuit Court,
Baldwin County, Ala.

In Equity.

Comes the Defendant, Martha Pleasant, and for answer to the Original Bill of Complaint filed in the above styled cause, denies each and every allegation contained in the said bill of complaint and demand strict proof of same. She waives service by the sheriff of subpoena on said bill, notice of the filing of interrogatories, or any proceeding to take testimony on oral examination, as well as the right to cross examine, and consents that this cause be submitted for decree on note of testimony made by the Register either in term time or vacation.

Dated this 5 day of January, 1920.

Witness:

Med. W. Rae, Jr.
Mobile Co Ala
Court

Martha Pleasant

THE STATE OF ALABAMA, COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Carey Pleasant Complainant

vs.

Martha Pleasant Defendant

Oral examination before the Register of the following witnesses:

Carey Pleasant and Edward James

who reside in Alabama, said examination being conducted in Bay Minette Alabama, on this the 19th day of January, and there being present

Carey Pleasant and Edward James

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

My name is Carey Pleasant. I am over twenty-one years of age and have lived in Baldwin County, Alabama for a period of more than three years next preceeding the filing of this bill.

I reside at Bay Minette, Alabama. Martha Pleasant is over the age of twenty-one years ~~of age~~ and resides at Calvert, Alabama.

Martha Pleasant and myself were married more than ten years ago and lived together as man and wife for three or four years.

That Martha Pleasant more than two years before the filing of this bill voluntarily abandoned my bed and board and has not lived with me since.

Witnesses: [Handwritten signatures] Carey Pleasant

Sworn and subscribed to before me this 19th day of January, 1920.

[Handwritten signature] Register.

Edward James being sworn testified as follows:

My name is Edward James. I know Carey Pleasant. He has not lived with Martha Pleasant for the last three or four years. I have been working with him during this time and know that they have not lived together during this time. Martha Pleasant has not been near here since they separated.

Witness
Henry Brown

Edward James

Sworn and subscribed to before me this 19th day of January, 1920.

J. W. Reardon
Register.

THE STATE OF ALABAMA COUNTY

N. COURT HOUSE IN MOBILE

I, R. W. Rice, as Register

hereby certify that the foregoing deposition on oral examination was taken down by me in writing in the words of the witness and read over to them and they signed the same in the presence of H. D. Moore at the time and place herein mentioned; that I have personal knowledge of the personal identity of the said witness, or had proof made before me of the identity of said witness; 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 19th day of Jan, 1920

R. W. Rice (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 \$
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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,

_____ COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Bary Pleasant

vs. Complainant,

Marcia Pleasant

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of Witness

for Complainant

Filed 19 day of Jan, 1920

Published by order of the Court, _____

day of _____, 19____

G. W. Hillman

Register.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 3131 Term, 19120

G. Amy Pleasant

Complainant.....

vs.

Martina Pleasant

Defendant.....

To J. W. Rimmer, 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 & Moore

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 & Moore

Solicitor for Complainant.

4th

No. 217

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

Bary Pleasant

vs.

Mareta Pleasant

REQUEST FOR DECREE IN
VACATION.

Filed Jan 21 at 1910

T. M. Williamson

Register

Recorded in Record

Vol. Page

Register

Bary Pleasant

vs.

Martina Pleasant.

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,

*Answer of Defendant and testimony of 2
Witnesses*

and in behalf of Defendant upon

J. P. Rice
Register

5th

No. 217

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Brey Pleasant

vs.

Martha Pleasant

NOTE OF TESTIMONY.

Filed in Open Court this 21st

day of Jan 1910

G. W. Keenon

Register

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 212..... CIRCUIT COURT, IN EQUITY.

Carey Pleasant.

Complainant.....

vs.

Martha Pleasant.

Defendant.....

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

~~answer of defendant and testimony of 2 witnesses~~

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.....

his..... 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.....

Carey Pleasant,

is forever divorced from the said

Martha Pleasant,

for and on account of

Abandonment

..... as alleged in said Bill of Complaint;

It is further ordered, that the said Carey Pleasant

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 Carey Pleasant,

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 Martha Pleasant,

It is further ordered, adjudged and decreed that said Carey Pleasant,

shall not again marry except to said Martha Pleasant

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Martha Pleasant, during the pendency of said appeal.

This 11th day of March, 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. 212.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Carey Pleasant.

vs.

Martha Pleasant.

DECREE OF DIVORCE.

Filed in office this 13th

day of March 1920. 1920

D. W. Rierson
Register.

E. O. M.

Recorded
on
minutes