

117

HARVEY A. WHITE,
Complainant.

-vs-

KATIE LEE WHITE,
Defendant.

CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA
BALDWIN COUNTY

It is agreed between Page & Moorer, Solicitors for Defendant and Stone & Stone, Solicitors for Complainant, that the above cause be submitted in vacation for final decree.

Page Moorer
Solicitors for Defendant.

Stone Stone
Solicitors for Complainant.

Filed 1/28/1919
T. W. Richardson
Register

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HARVEY A. WHITE,
Complainant.

-vs-

KATIE LEE WHITE,
Defendant.

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

Comes Katie Lee White, the defendant in the above styled cause and for answer to the Bill of Complaint denies each and every paragraph thereof and demands strict proof of the same.

PAGE & MOORER
Solcitors for Defendant.

Answer to complaint

of

Katie Lee White, Deft.

HARVEY A. WHITE,
Complainant.

-vs-

KATIE LEE WHITE,
Defendant.

SUIT FOR DIVORCE

Filed 8/22 1918.

J. W. Register
Register

Page & Moorer,
Solicitors for Defendant.

Harvey A White.

vs.

Katie Leo White.

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 evidence of witnesses Rev W.J.Hobbs, Mary Ida White and
Norman Gilbert. in behalf of Complainant.

and in behalf of Defendant upon.....



Register

No. 117.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Harvey A White

vs.

Katie Lee White.

NOTE OF TESTIMONY.

Filed in Open Court this..... Jan 17th

day of 1919.

J. W. McIlwain

Register

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Harvey A White

Complainant.....

vs.

Hattie Lee White

Defendant.....

No.....

Now comes the Complainant by *Stone & Stone*

Solicitor of Record, and makes application to the Register of said Court to issue a Commission to take the testimony in said cause, or oral examination, of the following named witness....., who reside within the State of Alabama:

NAME OF WITNESS.

RESIDENCE OF WITNESS.

Mary Ida White

Bay Minors Ala

Norman Gilbert

" " "

W J Hobbs

Robertdale Ala

And *we* suggests the name of *J W Richardson*

who resides at *Bay Minors Ala* as a suitable person to be appointed Commissioner to take the testimony of said witness.....

This *8th* day of *Jan* 19*19*

Stone & Stone

Solicitor for *Complt*

The Applicant for said Oral Examination is hereby required to give in writing..... days notice thereof, before the examination is taken, to the adverse party, or to..... Solicitor..... of Record, if either reside..... in this District, but if neither reside therein, the notice may be given by entry on the Order Book of the Clerk.

J W Richardson

Register.

No.

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL
EXAMINATION.

vs.

Filed in office this 8th
day of January 1917
R. M. Williams
Register.

We hereby consent to the above taking of testimony and waive further notice of the same.

Roger Brown
Solicitors for Defendant.

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 Katie Lee White,

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

Harvey A White,

against said

Katie Lee White,

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 27th day of August

1918.

T. W. Richerson
Register.

Original

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No. 117.

SUMMONS.

Harvey A White

vs.

Katie Lee White.

Stone and Stone.

Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this 30

day of July 1918

C. E. Eubanks
Sheriff.

Executed this 14 day of

August 1918

by leaving a copy of the within Summons with

Katie Lee White
Defendant

C. E. Eubanks
Sheriff

By

Deputy Sheriff.

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Harvey A. White, Complainant vs.

Katy Lee White Defendant

Oral examination before the Register of the following witnesses:

Reverend W. J. Hobbs.

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, on this the 14th day of January, 1919 and there being present Stone & Stone, attorneys for Complainant

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

I know Harvey A. White and Katie Lee White his wife. I have known Harvey A. White for the past two years or more and Katie Lee White for about six or eight years. Harvey A. White is over the age of twenty-one years of age. They both lived in Baldwin County, Alabama up to the time Harvey A. White went into the army and Katie Lee White moved to pensacola about three months ago and she has come back and forth since that time.

I know her general reputation for morality and chastity in the community in which she and I lived. It was about as bad as it could be. Her reputation is that she has committed adultery with different men.

Rev W. J. Hobbs

THE STATE OF ALABAMA, _____ COUNTY.
IN SENATE COURTS.
IN SENATE COUNTY.

I, T. W. Richardson, as Register in Chancery and Commissioner in this cause, 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 him and he 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, 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 14 day of January, 1919
T. W. Richardson (L. S.)
Register

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

REGISTER'S FEES.

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

No. Page

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.

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Harvey A White

Complainant

vs.

Katie Lee White

Defendant

Oral examination before the Register of the following witnesses:

Mary Ida White. ~~W J Hobbs and Norman Gilbert~~

who reside in Alabama, said examination being conducted in Bay Minette Alabama,
on this the 8th day of Jan. 1919, and there being present

Mary Ida White

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

My name is Mary Ida White and I am the Mother of Harvey A White

the complainant in above case, I know Katie Lee White, I know that they
were married and lived together as man and wife, they were married on Dec. 25
1916 in Baldwin County Alabama, they both have been residents of Baldwin
County Alabama, for more than three years before this suit was filed,

They have one child which Katie Lee White claims is the child of Harvey
A White, it is a boy nearly three years old.

Katie Lee White bears a bad name for chastity, she is notorious in this
County for immorality. She runs around with other men at all hours day
and night since her husband left. She is not a proper person to have charge
of said child who is named Luverne Sheldon White.

Harvey A White is able and a proper person to have the care and custody of
said child. .

Mary Ida White

I, J. 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 her and she 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....., 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 5th day of Jan, 1919
J. W. Rice (L. S.)
Register

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	\$.....
.....	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	\$.....

No. _____ Page _____

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.

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Harvey White Complainant vs. Katie Lee White Defendant

Oral examination before the Register of the following witnesses:

Norman Gilbert

who reside in Alabama, said examination being conducted in Bay Minette Alabama, on this the 11th day of Jan. 1919, and there being present

Norman Gilbert

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

My name is Norman Gilbert, I am a resident of Baldwin County Alabama, and 19 years old next Birthday, I know Harvey White and Katie White his wife, they are over 21 years of age and both are residents of Baldwin County, Alabama. I have known Katie White for the past two years, I know her general reputation in the community in which she lives, her reputation for chastity is bad, she is easy to have sexual connection with, she is a lewd woman and leads an immoral life. I know this by reputation and also personally. During the month of July 1918 I had sexual intercourse with her several times, this was at Rat Matheneys house about 6 miles from Robertsdale, Ala. it was done with her full consent. Everybody knows what she is in South Baldwin County All the boys go after her whenever they want to.

Norman Gilbert (signature)

THE STATE OF ALABAMA
IN CIRCUIT COURT IN EQUITY

I, D. W. Reardon, as Register

hereby certify that the foregoing deposition..... on oral examination taken down by me in writing in the words of the witness..... and read over to her and he 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....., 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 16 day of Jan, 1917
D. W. Reardon (L. S.)
Register

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 \$
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- 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.

_____ 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.

-----X
HARVEY A. WHITE,)
Complainant.)

-vs-

KATIE LEE WHITE,)
Defendant.)
-----X

IN THE CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA
BALDWIN COUNTY

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA EQUITY SIDE, AND THE HONORABLE A. E. GAMBLE, JUDGE THEREOF, IN EQUITY SITTING:-

Harvey A. White exhibits this his original Bill of Complaint for divorce for adultery against Katie Lee White and respectfully represents and shows unto your honor:

FIRST

That he is a "bona fide" resident of Baldwin County, State of Alabama and has resided therein for all of his life but that at present he is in the Military Service of the United States at Cam Severier in Greenville, North Carolina. That he is over the age of twenty one years. That the Defendant, Katie Lee White is also a resident of Baldwin County, State of Alabama, residing near Bay Minette.

SECOND.

That your Orator and Katie Lee White were married on to-wit; The 25th day of December, 1916, in Baldwin County, State of Alabama and that they lived together as man and wife until a few months ago when he was inducted into the military service.

THIRD.

That since your Orator has been absent from home and the said Katie Lee White, she has been unfaithful to her martial vows to him and has lived a notoriously lewd and immoral life. That she has committed adultery. That on or about, to-wit, the middle of July, 1918 the said Katie Lee White committed an adulterous act or had illicit intercourse with one Norman Gilbert. That noe of said acts of adultery or illicit intercourse have ever been condoned or forgiven by your Orator.

FOURTH.

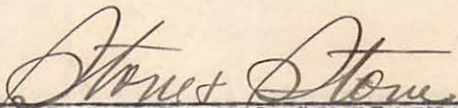
That there has been born to said Katie Lee a male child about two years of age named Luverne Sheldon. That said child is now in the custody and cunder the control of said Katie Lee White; the Katie Lee white is an improper and unfit person to have the charge and control of said child because of her lewd and immoral life that she nows lives That your Orator has, in the home of his parents, a place suitable and proper for the caring of the child and the proper education of him.

PRAYER FOR PROCESS.

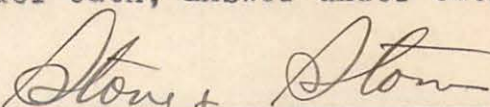
The Premises considered, Orator Prays that process be issued out of this Honorable Court requiring the said Katie Lee White to appear and plead, answer or demur to the original Bill of Complaint in this cause filed, within the time required by law, under the pains and penalties of this Honorable Court.

PRAYER FOR RELIEF.

Your Orator prays that upon a final hearing of this cause that Your Honor will render adjudge and decree that the bonds of matrimony heretofore existing between Orator and Katie Lee White be forever dissolved and that Your Orator be permitted to again contract the marriage relation and that your Honor will further order that the custody, control and care of the male child, Luverne Sheldon be given to your Orator. And as in duty bound, he will ever pray, etc.


SOLICITORS FOR COMPLAINANT

FOOT NOTE:- The Defendant, Katie Lee White, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOURTH" both inclusive, but not under oath, answer under oath being hereby expressly waived.


SOLICITORS FOR COMPLAINANT

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 117 CIRCUIT COURT, IN EQUITY.

Harvey A. White Complainant
vs.
Katie Lee White Defendant

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

Harvey A. White is forever divorced from the said
Katie Lee White for and on account of
Adultery.

as alleged in said Bill of Complaint;

It is further ordered, that the said Harvey A. White 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 Harvey A. White 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 Katie Lee White

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

It is further, ordered, adjudged and decreed that said Katie Lee White have the custody, care and control of the child Luveren Sheldon.

This 8th day of July 1919

W. G. Gumbly
Judge of the Circuit Court of Baldwin County.

No.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

vs.

DECREE OF DIVORCE.

Filed in office this

2/3/11

day of 191*7*

J. W. Richardson

Register.

E. O. M.

*Decree Recorded on
minutes.*