

217

.....John Daniel Hall,.....

.....

.....vs.

.....Nellie Gray Hall,.....

.....

.....

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 in behalf of Defendant upon answer and cross bill, deposition of witnesses,
as follows: T.M. Green, George Green, Mrs. Nellie Gray Hall, Ernest Biggs,
Dewitt Drew, Mary Wilson, Mrs. John L Gray, Joe King, John Langham,
R.M. Chambless, Thomas N Gentry, F.F. Little.

Also agreement between Solicitors Filed July 29th, 1920, and of
record in the cause.

D. H. Richardson

Register

6 R

No. 217.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

John Daniel Hall,

vs.

Mrs. Nellie Gray Hall.

NOTE OF TESTIMONY.

Filed in Open Court this 29th,

day of July, 1920. 191

D. W. Dickerson

Register

JOHN DANIELL HALL,
Complainant.

-vs-

NELLIE GREY HALL,
Defendant.

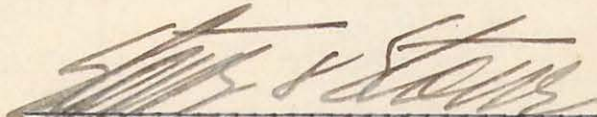
IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA
BALDWIN COUNTY

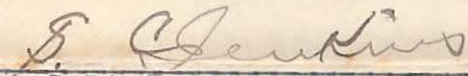
No. 217

TO HON. T. W. RICHERSON, REGISTER IN CIRCUIT COURT-EQUITY SIDE.

In accordance with that certain agreement entered into between the Solicitors for Complainant and the Solicitor^s for Respondent this day and this day filed with your office, you are hereby requested to forth-pubish the testimony and with/forward all papers, orders, decrees and testimony in the above styled cuase to the Judge of this Honorable Court for final decree.

July 28th., 1920.


Solicitors for Complainant


Solicitor for Repsondent

5- R
REQUEST FOR SUBMISSION
IN VACATION BY AGREEMENT.

Filed in this office this
July 28th., 1920.

T. W. Keenan

Register.

the Solicitors for complainant and the Solicitors for respondent this day
in accordance with that certain agreement entered into between
the Solicitors for complainant and the Solicitors for respondent this day
and this day filed with your office, you are hereby requested to forth-
with forward all orders, decrees and judgments in the above sty-
led cause to the Judge of said Honorable Court for final decree.

July 28th., 1920.

Solicitors for complainant

Solicitors for respondent

HAMMILL

insolent as it relates to the merits thereof; that same to be considered as if taken by a duly appointed commissioner on a duly appointed time for the taking of testimony as to the merits.

It is further agreed that this cause be submitted for final decree in vacation and that the Register be requested to forthwith forward all papers pertaining to this cause to the Judge of this Court for final decree.

Dated this July 28th., 1920.

Stamps & Stamps
SOLICITORS FOR COMPLAINANT.

S. Gen. Kiss + Jesse F. Hogan
SOLICITORS FOR DEFENDANT.

4

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AGREEMENT BETWEEN
Solicitors for Complainant
and
Solicitor for Respondent

Filed this July 28th., 1920.

T. W. Richmond
Register.

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 Nellia Gray Hall,

of Wilcox 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

John Daniel Hall,

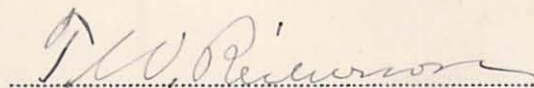
against said

Nellia Gray Hall,

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 January,

191.....



Register.

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

3 Original R

Copy on Nellia Gray Hall.

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.....

SUMMONS.

John Daniel Hall

vs.

Nellie Gray Hall,

stone and stone.

Solicitor for Complainant.

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

Please serve copy on Nellie Gray Hall
lives at Caledonia Ala

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this.....

day of 191.....

Sheriff.

Executed this..... day of

7ef 4 1920

by leaving a copy of the within Summons with

Nellie Gray Hall

Defendant

W.A. McLean

Sheriff

By

Deputy Sheriff.

JOHN DANIEL HALL,
Complainant.

-vs-

NELLIE GRAY HALL,
Defendant.

IN THE CIRCUIT COURT-EQUITY SIDE.

STATE OF ALABAMA.

BALDWIN COUNTY

Comes the complainant in the above styled cause and for answer
to the Cross Bill of the Complainant in this cause filed, sayeth:-

FIRST:-

The complainant denies each and every paragraph of Section Six
from one to three inclusive and demands strict proof of the same.

Stuart Stuart
Solicitors for Complainant.

-----X
JOHN DANIELL HALL,)
Complainant.)
-vs-)
NELLIE GRAY HALL,)
Defendant.)
-----X

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

No. _____

TO THE HONORABLE, THE CIRCUIT COURT, BALDWIN COUNTY, EQUITY SIDE, AND
THE HONORABLE JOHN D. LEIGH, JUDGE THEREOF, IN EQUITY SITTING:-

Comes your complainant, John Daniell Hall, and exhibits this
his bill of complaint for divorce for adultery against Nellie Grey
Hall and for grounds thereof respectfully shows unto this honorable
Court and unto your Honor as follows:-

FIRST.

That your complainant is a bona fide resident of Baldwin
County, Alabama, where he has resided for the past nine years next
immediately preceeding the filing of this bill of complaint and is
over the age of twenty-one years; that the defendant, Nellie Gray Hall
is over the age of twenty-one years and when last heard from resided
at Caladonia in the State of Alabama.

SECOND.

That your complainant and the defendant were married on to-
wit- August 17th, 1914, at Camden, Wilcox County, Alabama, and lived
to-gether as man and wife until about to-wit; September 2nd, 1919.

THIRD.

That since the marriage to the complainant of the defendant
the defendant has become a lewd and immoral woman; that she has from
time to time notoriously lived in adultery with men without the knowl-
edge of the complainant and has often left the home of the complainant
and went away with other men; that complainant has, on several occas-
ions forgiven said defendant and taken her back; that while he was
confined to his bed with severe sickness during the fall of 1919 the
said defendant committed several acts of adultery with different men
among whom was one George Green, the names of the others being other
wise unknown to complainant; that the said George Green came of the
house where the complainat was sick and took the defendant away and
with him to his own house where they committed adultery; that complain

ant, when able to leave his bed, went to the house where the defend-
ant and the said George Green were living together to get the defend-
ant but was not allowed to enter the same; that your complainant has
never condoned or forgiven said defendant for the said last acts of
adultery.

FOURTH.

That there was born to defendant and complainant by said mar-
riage one female child named Eva May Hall who is now of tender age.
That the defendant, because of her lewd life and immoral habits and
disgraceful life is not a fit and proper person to have the care,
custody or control of said child but that your complainant is a man
of ripe age and is a fit and proper person to have the care, custody
and control of said child and is well able to care for and maintain
the same in a manner suitable to its condition in life, which the de-
fendant is not able to do.

PRAYER FOR PROCESS.

The premises considered your complainant prays that your
Honor will make and enter and cause to be made and entered such order,
subpoenas and decrees to the said defendant as are necessary to make
her a party respondent to this bill of complaint, requiring her to
appear and plead, answer or demur to the same within the time required
by law under the pains and penalties of this court.

PRAYER FOR RELIEF.

That upon a final hearing of this cause that your honor will
render, adjudge and decree that the bonds of matrimony heretofore
existing between the complainant and the defendant be and that the
same are forever dissolved and that your complainant may be again
contract the marriage relation if he so desires; that your honor will
render, adjudge and decree that the complainant have the care, custody
and control of said female child, Eva May Hall. And as in duty bound,
he will ever pray, etc., etc.,

Steu & Steu
Solicitors for Complainant.

FOOT NOTE:-The defendant is required to answer each and every para-
graph of the foregoing bill, from "FIRST" to "FOURTH", both inclusive,
but not under oath, answer under oath being hereby expressly waived.

Steu & Steu
Solicitors for Complainant.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. CIRCUIT COURT, IN EQUITY.

John Daniel Hall

Complainant.....

Nellie Gray vs. Hall

Defendant.....

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, ~~decree pro confesso~~ ^{in vacation}, Answer and Cross Bill of Complaint, ~~agreement of publication~~ on

and testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the ~~Complainant~~ ^{Defendant} is entitled to the relief prayed for in her said answer and Cross Bill of Complaint ~~of Complainant~~ as filed to 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 ~~Gray Hall~~ ^{Nellie} is forever divorced from the said ~~John Daniel Hall~~ for and on account of Cruelty

It is further ordered, that the said ~~Nellie Gray Hall~~ ^{Cross} as alleged in said Bill of Complaint; be, and ~~she~~ 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 ~~John Daniel Hall~~ 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 ~~Nellie Gray Hall~~

It is further ordered, adjudged and decreed that said ~~Nellie Gray Hall~~ shall not again marry except to said ~~John Daniel Hall~~ until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said ~~John Daniel Hall~~ during the pendency of said appeal.

It is further ordered, adjudged and decreed by the court that the custody of the female child Eva May Hall be awarded to the defendant

This day of 191.....

Judge of the Circuit Court of Baldwin County.

No.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

John Nellie Gray Hall

vs.

John Daniel Hall

DECREE OF DIVORCE.

Filed in office this

day of 191

Register.

E. O. M.

*2 files sub Mr Simpson be see 30x31
in 20x22
Inlet
to Hand Lumber Co
See by Book 27679*

T. W. RICHESON
CLERK AND REGISTER CIRCUIT COURT
BALDWIN COUNTY, ALA.

BAY MINETTE, ALA. July 31st, 1920.

Hon. J. D. Leigh,

Dear Judge.

Enclosed find file in cause of Hall vs Hall,

I enclose 2 blank decree's so that if the one Sam filled in for your convenience does not suit you can use the other.

With best regard I beg to remain yours truly.

T. W. Richeson

The State of Alabama,)
Baldwin County.)
-----)

In Equity, Circuit Court,
Baldwin County, Alabama.

John Daniel Hall,)
Complainant
vs

Complaint.

Nellie Gray Hall,
Respondent.

This cause coming on to be heard in vacation was submitted upon the bill of complaint on behalf of complainant and in behalf of defendant answer and cross bill decree pro confesso and the depositions of witnesses for and behalf of the Respondent as follows: T.M.Green, George Green, Mrs. Nellie Gray Hall, Ernest Biggs, Dewitt Drew, Mary Wilson, Mrs. John L Gray, Joe King, R.M. Chambless, John Langham, Thomas N Gentry and F.F. Little, and testimony as noted by the Register; and upon consideration thereof the Court is of the opinion that complainant is not entitled to the relief prayed for in his bill of complaint, and it is therefore ordered, adjudged and decreed by the Court that the said complainant be denied the relief prayed for in his bill of complaint.

On consideration of the respondents answer cross bill and deposition aduced in her behalf the Court is of the opinion that she is entitled to the relief prayed for in her answer and cross bill; it is therefore ordered, adjudged and decreed that Nellie Gray Hall is relieved of the bond of matrimony heretofore existing between the said John Daniel Hall and herself and the same so far as they relate to the said Nellie Gray Hall be and they are hereby dissolved and the said Nellie Gray Hall is forever divorced from John Daniel Hall for and on account of the extreme cruelty of said John Daniel Hall to the said Nellie Gray Hall. It is further ordered that the said Nellie Gray Hall be and she is hereby permitted to contract marriage again. It is further ordered, that the said John Daniel Hall 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 Nellie Gray Hall.

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

It is further ordered, adjudged and decreed that on account of the fact that it has been fully proven to the Court that the said John Daniel Hall is a man of bad character and not a fit person to have the custody and control of the child born unto them, but upon the other hand the Court is of the opinion that the said Nellie Gray Hall is a fit person to have the control and custody of Eva May Hall, it is therefore ordered, adjudged and decreed by the Court that the custody, care, management and control of the said Eva May Hall be given absolutely to the said Nellie Gray Hall.

Dated at Brewton Alabama, this the 24th, day of December, 1920.


John D Leigh,

Judge of the Circuit Court of Baldwin
County, Alabama.

The State of Alabama,)
Baldwin County.)
-----)

Circuit Court in Equity.

I.T.W. Richerson, 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 24th day of December, 1920, in the cause of John Daniel Hall, Complainant, vs Nellie Gray Hall, Respondent, as appears of record in said Court. Witness my hand and the seal of said Court, this the 27th, day of December, 1920.

 I.T.W. Richerson Register.

John Daniel Hall, Complainant

vs

Nellie Gray Hall, Defendant.

Depositions of

John Langham, R.M. Chambless,

Thomas N Gentry,

F.F. Little, witnesses for

Defendant.

Filed June 26th, 1920.

J. W. Richerson
-----Register.

Published by agreement of
Counsel July 28th, 1920.

J. W. Richerson
-----Register.

After 5 days return to
J. W. Richerson
Clerk of the Circuit Court and
Register in Chancery
Bay Minette, Ala.

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

John Daniel Hall, Complainant

vs.

Nellie Gray Hall, Defendant

On Reference heretofore made on June 1st, 1920 by the Judge of the Court and, Oral examination before the Register of the following witnesses:

John Langham, R.M. Chambless, Thomas Gentry, F.F. Little,

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, 16, 1920 on this the 26th, day of June, 1920 / said examination being continued from June / and there being present myself

Hon. S.C. Jenkins, Solicitor for Defendant and Hon. N.C. Stone, Solicitor for Complainant,

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

(OVER)

I, T.W. Richerson, as Register,

hereby certify that the foregoing deposition s on oral examination was taken down by me in writing in the words of the witness es 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 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 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 26th day of June, 19 20.

T.W. Richerson (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 \$
- 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

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

John Daniel Hall.

vs. Complainant,

Nellie Gray Hall,

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of Witnesses

for Complainant.

Filed 26 day of June, 19 20

Published by order of the Court, agreement of

Counsel July 28th, 19 20

D. W. Ricardson

Register.

June 26th 1920

Continued from June 16th, 1920, of the oral testimony
in the cause of John Daniel Hall vs Nellie Gray Hall.

John Langham, witness for Deft testified as follows:-

My name is John Langham, I live at Lottie Baldwin County, Alabama, and have lived there for fifteen years.

I know Mr and Mrs J.D.Hall when they lived at Lottie, Alabama,

I know the general reputation of Mrs. J.D.Hall in that community, and have never heard anything against her if she was doing anything wrong I have never heard of it and do not know it and have never heard anybody else accuse her of doing wrong. My knowledge of her reputation I say that it is good I have never seen anything to the contrary.

I was never in their house in my life. ~~I have seen~~
I know the general reputation of J.D.Hall in that community, it is generally bad, On cross examination witness testified as follows:

I base ~~my~~ knowledge of Mr. J.D.Hall's reputation on what the people say about him, I have people discuss him, I have Mr George Green, Tim Green, discuss him, Mr. and Mrs Hall lived not quite a half mile from me.

On re direct examination witness testified as follows:-

Mr. Hall is an able bodied man able to work, he is a good hand to work, one of the best ditchers I ever saw, he cut a ditch for me last winter.

If he would work steadily, like wages are now he would earn \$50.00 or \$75.00 per month. I think that if he would give his wife \$30.00 per month it would keep her up.

When Mrs Hall lived in that community she took in sewing, was a smart woman and would work. I have no ill feelings toward Mr. Hall and no particular friend of Mrs. Hall.

On re cross examination witness testified as follows:-

I do not know Mr. Hall's earning capacity nor, nor I do not know what he is worth.

On redirect examination witness testified as follows:*
Knowing Mr. Hall as I do and his reputation in the community, I do not consider that he would be a fit person to raise a female child or have the custody of same.

~~I think~~ If it was not for my wife I would not think I was a fit person to raise a child, myself.

John Langham

Subscribed and sworn to before me this
26th, day of June, 1920.

D. M. [Signature]
-----Register.

Mr. R.M.Chambilss ,witness for Defendant testified as follows*-

My name is R.M.Chambless I live at Lottie,Ala,

I know the reputation of Mr. and Mrs. J.D.Hall at Lottien Ala

the community in which they lived the repuation of Mrs. Nellie Gray Hall is good and the repuation of J.D.Hall is bad.

I heard him make a statement at Church one time claiming he was a better man than he used to be and in this statement made about three years ago he said he used to steal chickens and they never got too high for him to get them and he was supposed to be preaching at the time . I have passed by the house where Mr. and Mrs Hall were living and frequently saw Mr.Hall sitting with his feet propped up on the porch doing nothing and Mrs.Hall seemed to be busy around the house and was frequently sewing on the sewing machine.

Mr.Hall is an able bodied man and according to the way wages are now ,I am not posted on wages or public work,he ought to make from \$40.00 to \$50.00 per month.the way things are now it would take from \$30.00 to \$35.00 per month to support her.

On Cross examination witness testified as follows:-

I base my knowledge of Mr. Hall's reputation on what people in that Community say,I have heard Mr. Langham,Mr. Geo Green, Tim Green talk aboutMr. Hall,I do not know what Mr. Hall is worth, I do not know what his earning capacity is now,when he made that statement he did not say how long ago that he used to live that life,

Subscribed and sworn to

R. M. Chambless

before me this 26th, day of
June, 1920.

D. W. [Signature] Register.

Thomas Gentry witness for Defendant testified as follows:-

My name is Thomas Gentry, I have lived at Lottie, Alabama, about 12 years, I know the reputation of Mrs. J.D. Hall in that community and it is good.

I know the general reputation J.D. Hall and from what other people tell me it is bad. I live about a mile of them, I worked in about 75 feet of his house, I heard Mr. Hall cursing and abusing Mrs. Hall from time to time since while I was working there, I never did see anything but what I heard between the two, I saw a bruise on Mrs. Hall's neck, I saw the finger prints of a hand on Mrs. Hall's neck where someone had choked her.

On cross examination witness testified as follows:-

I heard the general community at large talk about Mr. Hall, I heard Mr. Geo Green, Tim Green talk about Mr Hall's reputation, No one spoke of Mrs. Hall except something good, I heard Mr. Geo Green his folks, Mr. Tim Green and his folks, Mr. Biggs, Mr Tom Pesseley and others speak of her and all spoke good of her. I never did see Mr. Hall choke Mrs. Hall, I do not know whose finger prints those were on Mrs. Hall's throat.

Re ~~Cross~~ examination witness testified as follows:

I never saw any one else live in their house except Mr. and Mrs, Hall I can swear that no one was in the house except Mr. Hall, Mrs, Hall and their little child, I was right where I could see any one going out or coming in, I didn't see anybody go in there.

Mrs. Wilson did not go in that house that evening, ~~& she did not go~~
Before this at another time I saw Mrs. Manpie Wilson coming away from there

Thomas Gentry

Subscribed and sworn to before me
this 26th, day of June, 1920.

D. W. Richerson
-----Register.

F.F.Little ,witness for Defendant testified as follows:-

My name is F.F.Little, I live at Lottie,Alabama, and have lived there about twelve years.

I know Mr. and Mrs, J.D.Hall that lived in that community, am well acquainted with Mr. J.D.Hall,I know Mrs Nellie Gray's Hall reputation in that community and it is good.

I know the general reputation of Mr. J.D.Hall in that community,he and I have gotten along together alright but people speak bad of him and his reputation generally is bad. Ever since last Fall Mr. Hall has had Malaria,but he can do as much work and more ditching than anyone.

If he would work steadily the way things are now he could make \$60.00 per month easily.

Mrs. Hall is a thrifty little character and every time I would pass she would be busy at the sewing machine.

I think \$30.00 per moth would support her and she might save some out of that.

In the condition is placed in I think it would be better that Mrs. Hall keep the child.

I have Mr. Langham ,Mr,Chambliss, Mr.Biggs, Mr. George Green,Tim Green, Mr. Jones, and other neighbors discuss ~~the~~ reputation of Mr. J.D.Hall,

F.F. Little

Subscribed and sworn to before me
this 26th,day of June, 1920.

J. W. Robinson-----Register.

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

John Daniel Hall Complainant vs.

Nellie Gray Hall, Defendant

On Reference heretofore made on June 1st, 1920 by the Judge of the Court, and Oral examination before the Register of the following witnesses:

Mrs. Nellie Gray Hall, T.M. Green, George Green, Ernest Biggs, De Witt, Drew, Mrs. Mary Wilson. Mrs. John L. Gray, and Joe King.

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, on this the 16th, day of June, 1920, and there being present

Hon. S.C. Jenkins Solicitor for Defendant and Hon N.C. Stone, Solicitor for Complainant.

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

(OVER)

I, T.W. Richerson, _____, as Register

hereby certify that the foregoing deposition S on oral examination was taken down by me in writing in the words of the witness es 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 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 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 16th day of June, 1920.

T.W. Richerson (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	\$
.....	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	

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

John Daniel Hall

vs. Complainant,

Nellie Gray Hall.

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of wineses for-

for Defendant

Filed 16th day of June, 19 20

Published by ~~order of the Court~~ agreement

day of of Counsel, July 28, 19 20

D. McCusson

Register.



U

Mrs Nellie Gray Hall, the Defendant - testified as follows:
My name is Mrs. Nellie Gray Hall, I live at Nadawah, Alabama,
I am the wife of John Daniel Hall, I left him the 2nd day of
September, 1919, I left him because he was so cruel and mean to me
I couldn't live with him, he was continually cursing, me slapping
me, and knocking me around at one time he hit me with a stick
and he was continually slapping me and knocking me over the head,
The morning I left him he kicked me on the leg and there was a
bruise on said leg for 2 weeks and the bruise was as black as
smut, I have a child that is three years old, when I was in child
bed he slapped me twice and cursed me frequently. When I made a
request of him to let my mother know my condition he would get
mad and curse me, After the baby was six weeks old I was carried
to a Hospital at Selma, Alabama, Mr Hall did not pay one penny
on the expenses incurred while I was at said Hospital, my sister,
myself and my mother paid the expenses Hospital bill was one hundred
dollars with the aid of my sister and mother I arranged for the
payment of this bill, Mr. Hall furnished no clothes shoes or any
wearing apparel for myself or child at this time, I made myself by
taking in sewing, and had a little timber money from the sale
of timber from my mothers place, and I paid forty five dollars on
the hospital bill, and my sister Mattie Gray paid the balance,

At times to aggravate me he would not let me have the baby,
or let me give it medicine but would hold it himself and would
take it off and keep it all day from me, he kept the baby off at one
one time so late that I went to see about it and when I went
where he was he slapped me over the head twice and seemed to be
mad because I went after the baby,.

He has gone off and left me for a day and night at a time and left
me without anything to eat and the neighbors would have to furnish
something for me to eat, He was always cursing my people, my father
that is dead, my mother and sisters who helped me, He was always
threatening to cut my throat, Mr. John Daniel Hall has no Character
in the community where lived at the time I lived with him near
Lottie, Ala, I know he stole lots of things and brought home,
he would steal chickens and eggs, and would steal anything he

could get his hands on .

Mr. John Daniel Hall, is an able bodied man and he could make \$50.00 05 \$60.00 per month it was very seldom that he would work at at all,#####

On cross examination by the Complainant., the witness testified as follows:-

I now live at Nadawah, Ala with my mother where I have lived for 9 months, I am acquainted with Mr. George Green,I have known him about four years ,-##### Mr.Green and my husband and I both lived on Mr. Pestwoods place at one time about 200 yrad and the other time in talking distance,This last time makes the 3rd, time that I have left my husband,I left with Mr Henry Cumbie, he carried me to Atmore ,where I caught the train and went to my mothers,I paid Mr. Cumbie to take me to the train,I staid at my mothers 3 weeks at this time , Mr.Hall came up after me and I went back with him,the reason I left the first time was because my Grand-Mother was on her death bed and sent for me to come,My grand mother did not die until after 3 months from the time I got there, Mr. Hall had to come after me before I went back home,He objected to my going at first,About the middle of July,1919, my husband was taken sick and confined to his bed with malarial fever for 3 weeks I know that he was sick for 3 weeks but do not know how much longer,while he was sick I was with him all the time, I did not leave him for a day at a time nor even for a half a day at a time,I did go back and forth to my house to see about the things which would take a half a day ,he was sick at Kary Strength's house,his son-in Law it was 2 miles from Mr Kary Strenghts house to our house, I never did go to Mr. Greens house with Mr Green, the day I left my husband the last tije I did go to Mr Greens house,my husband did come to Mr Greens house while I was there , he came to the gate,I came to Mr Greens house because I was afraid of my husband as he had threatene d to cut my throat,Mr Hall called Mr Green out and had a talk with him but I do not know what was said,I have never committed adultery with any man at all, Mr. Green came to the house where Mr Hall was sick,

and where I was I was ,he came there to see Mr. Hall,
I never did leave with Mr. Green,when he made these visits ,
I never did at one time leave with Mr. Green and stay away nearly
all day, try to go again that evening ,nor did I stay away all
day nor did I go with him at any time.While Mr.Hall was sick at
Mr. Kary Strength's house I did not tell him that I loved Mr.
Green better than anything on the top side of the earth,and that
I expected to live and die for him,Mr Hall did not offer to take me
to the Hospital at the time I had to go there for treatment,The reason
I stated that he stole these things he stated that he stole them,
and I saw him steal some eggs forom a Negro. I did not eat any
of the eggs,any time he would steal anything he would tell me
that he had stolen them , he would pick the chickens at night
and burn the feathers , I would not eat any of the chickens,
I believe that Mr. Hall was able to work if he would do it
I did not threaten to cut Mr.Hall's throat while he was sick.

Subscribed and sworn to before me

16th day of June, 1920

On Re-Direct examination by Hon.S.C.KJenkins Atty for Deft ,witness
testified as follows:-

J.D.Hall and myself were legally married about ~~fi~~
^{have} five years ago, we only/one child about three years old the child is
now at my mothers house at Nadawah,Ala, the child is named Eva May,
My mother is able to provide ^{care} and take/ of the child,she has/520 acres
of land in Wilcox County, ~~and has been offered~~ it is werty at least
Ten dollars an acre , ^{I have} ~~the~~ prospects of getting a situation in Selma,
at \$25.00 per week ,I have 3 sisters and 2 brothers at Selma,
They are indepenent and ^{can} get all the help I want both for myself
and the child,J.D.Hall was not only cruel to me but he was cruel to
our baby slapping it and knocking it around , he did this constantly
up to the time I left him.

Subscribed and sworn to before me,

this 16th,day of June,1920.

J.W. Dickerson Register.

Mrs. Nettie Gray Hall



T.M. Witness for defendant being duly sworn testified as follows:

My name is T.M. Green, Last year I lived near Lottie, the same place where Mr. J.D. Hall, lived, the house I lived in was something like thirty or thirty five yards, from the home of Mr. and Mrs Green, I am well acquainted with both of them, I hear Mr. Hall cursing Mrs. Hall one night, last year, I think it was the last of August., I remember some of what he said to her, I heard him curse her for a God-Damned Slut, and he told her that if she sheeped he would cut her throat from ear ear to ear, At the time she quit him I heard him-slap her and heard the lick and heard him curse her, at the time that this occurred I heard her cry out to Mr. Hall to quit hitting her on the head as her head hurt anyway, I lived there by them about eight months, From the way she complained of his treatment Mr. Hall treated his wife cruelly I ~~testify~~ state this from what I heard and from what I saw, I saw Mr and Mrs Hall pass backward and forward before the window at the time she hollered out please quit hitting me on the head, I did not see him hit her,

I have known Mrs, Hall about 2 years I know her reputation in the community and I have heard anythink wrong about her, her reputation is good as far as I know, I do not know the reputation of Mr. Hall in the community in which he lives, but the I know what the people say about him, they give him a bad reputation,

On cross examination witness testified as follows:

I have never seen him hit her, but I heard this lick, I was about 35 Or 40 yards from the place where I heard the lick, the reason I know he hit her was her screaming out,.

his
T.M. Green
mark

Subscribed and sworn to this 16th,
day of June, 1920.

J. M. Riccison Register.



Green
being duly sworn,
George witness for Defendant testified as follows;

My name is George Green I live at Lottie Ala, and have lived there the last 5 years I know Mr. J. D. Hall and Mrs. Nellie Gray Hall, I do not know myself Mr. Hall's reputation only from what I have the people say, I know what the people of the community say about him they don't give him a good reputation and don't place much confidence in him, I lived about 75 yards from Mr. Hall, I never did hear him cursing his wife, ~~and she was out in the yard crying and he was at the gate and wouldn't let her out,~~ *that* Mrs. Hall has never had any acts of intercourse ^{with me} is false, and the statement to that effect is false, I never ^{saw,} / her going out with other men having intercourse with them while she lived there,

I remember when Mr. Hall was sick, in the Fall of 1919, and I did not have any sexual intercourse with Mrs. Hall at this time or any other time, I did not go to Mr. Hall's house and take his wife to my house and commit adultery at my house with her, all the going I had with Mrs. Hall was when he was along also, The morning they had the racket she came to my house, and after awhile he came out there and stopped at the gate and he told me if I would allow it he would go in and get the baby, and I told him that I had rather not have and racket at my house Mrs. Hall had come to my house and brought the baby and asked for protection, This is the only time he came to my house, he did not say anything about getting his wife, 7 months of last year he worked 35 days or 36 days, for me, during that 7 months, I didn't see or hear of his working anywhere else, I don't know of his working anywhere else, but I almost know it, While he was with his daughter he could ~~have~~ ^{his son or law} helped him a little, and could have helped him a whole lot but am not sure that he worked at all, I do not know of any property that he owns and do not know his financial standing,

On Cross examination witness testified as follows.

~~and~~ While Mr. Hall did not work for me I do not know how much he worked at other places. I ~~did not let~~ ^{objected to} Mr. Hall ^{going in} ~~have the child~~ ^{hand} the time he came to my house after it, because I knew there would be a fuss between him and his wife, I went to the house where Mr. Hall was sick while he was sick in bed, Mrs. Hall never went away from there with me,

I have been friendly towards both Mr. and Mrs. Hall,

Subscribed and sworn to before me this 10th day of November 1920
George Green

Ernest Biggs, Witness for Defendant being duly sworn testified as follows:-

My name is Ernest Biggs I lived within 25 or 30 yards of Mr J.D Hall and his wife, She started to leave him once and he headed her off at the gate and made her go back, I have heard him call her a bitch, I was at my house and he was at his house with her, I have heard him quarrelling with her several times,

I know that no one lived in their house but themselves, I know Mr Halls voice and recognized it at the time, he seemed to be mad

I know the general reputation of Mrs Hall and it is alright, I have never heard anything wrong against her,

I know the general reputation of Mr.Hall and from the way people talked it is bad, I wouldn't think he would be a fit person to raise a 3 year old child, some time he worked part of the week and some times he would work all the week sometimes he would work a day and be gone a day and I didn't know whether he was working or not,

If he worked regular he would earn \$50.00 Or \$60.00 per month,

On cross examination witness testified as follows:-

I have never seen Mr Hall strike Mrs.Hall, I have not seen him hit her, abuse her or mistreat her in anyway. except

When he turned her back at the gate I call that mistreating her,

when I heard this quarrelling going on I cannot swear there was anybody else in the house or not, ~~The people that I have heard~~

~~talk about Mr.Halls reputation~~ The names of the people I heard talking about Mr. Hall was Mr. Tim Green I cant name all of them

I can name Mr.George Greens wife, Mr. Tim Greens wife and Mr.George Green, as having talked about Mr. Hall.

Ernest Biggs,

Subscribed and sworn to before me

this 16th day of June 1920.

W. R. R. R.
-----Register.



Mrs. Mary Wilson a witness for Defendant testified as follows:

My name is Mrs. Mary Wilson. I live at Lottie Baldwin Co, Ala. I lived there when Mr. and Mrs. J.D. Hall, lived there, their house was about 40 yards from where I lived, I saw them every day, I heard J.D. Hall curse Mrs Hall everything but a lady, he constantly cursed her this way and I heard him, I heard it pretty often, I lived in talking distance of them, I know Mrs Hall and I know her general reputation in the community in which she lived and know her general reputation and from my knowledge of her general reputation I would believe her on oath. I know her general reputation for virtue and chastity and it is good she is a straight clean woman.

One evening about sundown he came in late I heard him cussing and abusing her and heard her crying and heard her say you have nearly unjointed my neck and I went over there, I found her in the kitchen and she showed me the black spot on her neck where he had hit her, she was crying and weeping, this was after the child was born, it was about two months before Mrs. Hall left him, I heard him threaten her life at a different time, he cursed her and told her if she cheeped again one more time that he would cut her throat from ear to ear, I heard this he was mad and rearing, I know the general reputation of J.D. Hall in the community in which he lives and it is bad.

On cross examination witness testified as follows:-

At all these times when I heard cursing and racket at Mr. Hall's house I do not know, who all were there, he was cursing Mrs. Hall individually as he called her name, When I heard him curse her he called her Nellie, he always calls her Nellie, I am very friendly with Mrs. Hall, I am very unfriendly with Mr. Hall, I have talked over this case with Mrs. Hall, some, The reason that I state that Mrs. Hall has a good reputation is because I have never seen anything wrong about her. I assisted Mrs. Hall the day she left Mr. Hall by buttoning the dress of the baby.

On Re-direct examination witness further testified:

Mr and Mrs Hall lived together near our house and no one lived with

U4

then except their little child, My friendliness for Mrs. Hall was on account of my sympathy for her for being mistreated by her husband and she was such a good woman, My unfriendliness for Mr. Hall grew out of the treatment of his wife, my being a neighbor and hearing him cursing her .

I know nothing at all about Mr. Hall ever stealing any chickens, eggs or anything in that neighborhood, he did not steal any from me,

On Re cross examination witness testified as follows:

Q Is it not a fact that you did not see a single act of cruelty and that you did not see a single act of mistreatment by Mr. Hall toward Mrs. Hall, and is it not a fact that you did not see him mistreat her.

Defendant objects to the question on the ground that it calls for the opinion of the witness and does not call for specific facts or acts, I did not see it but I heard it .

All I know is what I heard and saw, I have seen nothing but hear him abuse her, It is what I have heard and the bruise I saw on her , I did not see Mr. Hall make this bruise on her,

Redirect examination witness testified further:

At that time I saw this bruise on Mrs. Hall, was the day Mr. Hall was cursing her and she was crying and I hear Mrs. Hall say you have nearly unjointed my neck, and I immediately ran over to their house. and as soon as I got over there she showed me the sign and said he hit her there.

Subscribed and sworn to before
me this 16th day of June, 1920.

Mrs. Mary Wilson

J. W. Reimann
-----Register.

Mrs. John L Gray witness for defendant being duly sworn testified as follows:-

My name is Mrs. John Le Gray, all that I know about Mr and Mrs, Hall, is that he did not do anything to support or provide for her, She wrote to her brother and to ^{her mother} me begging us to send money and clothes, when she came to Selma to the Hospital she had only 2 gowns and they were the gowns she had when she married Mr. Hall

She was there several weeks, she paid something on the hospital bill, but her mother and sister paid the most of it but there is still a balance unpaid. Mr Hall did not pay one cent.

The baby only had 2 little slips for dress, ^{her sisters} we went to work immediately and made clothes for her and the child,

I know Mr. Hall and know his general reputation in the community in which he lives and know it to be bad as it could be, he would steal anything that he could get his hands on, Mrs Hall's reputation is good, I have known her for five years personally and have never heard anything against her in any way, if there ever was a virtuous woman, she is one.

On Cross examination witness testified as follows:-

I live in Selma, Ala, Mr Hall was living in ^{Atmore,} ~~Bay Minette~~ about 20 miles from Bay Minette, I have never lived in that community, I have never visited in that community, He lived at Caledonia about 3 years, ~~and~~ I did not live in Caledonia but I visited there ^{the neighborhood of} all my life, he has lived in Caledonia according to my understanding within the last four years. "I base my statement" that he did not do anything to support ~~and~~ provide for her upon what clothes she had when she came to Selma, and upon what she wrote and said I do not know of my own knowledge what provisions or support was made for her at her home, I know that these were all her clothes only because she said so., ~~and~~ I can stand up on a stack of Bibles as high as from here to New York City and swear that Mr. Hall did not pay any of the Hospital Bill, The only reason that I say he did not pay any money was, because

Mrs. Hall, her sister and her mother did pay all but a balance of ten dollars and that is still due. I am no kin to Mrs. John D Hall only by marriage I married her brother. I am her sister in law, I have never seen Mr. Hall mistreat Mrs Hall.

On Redirect examination witness further testified:-

I know that Mr. Hall did mistreat Mrs. Hall, most cruelly her and the baby all but murder them and he did threaten to murder them, I know this and I swear to it. Just as I am sitting in this chair I know it to be a fact because I know that I am sitting in this chair and know that you are writing on the type writer because I see you writing and hear it. I am familiar with Mr. J.D. Halls family, I am her sister in law, Nellie Gray Hall is a splendid seamstress and could make forty dollars a week working in Selma, she has 2 brothers 2 sisters in Selma, 2 brothers own their own homes and one has a beautiful business and they are all independent and could assist Mrs. Hall in taking care of the child should the custody of the child be given her she can make her home with any of us and we would be glad to have her, and we have insisted on her coming to Selma to live, Her mother ^{Mrs. Georgia Gray,} lives near Nadawah, Ala, and owns a large tract of land there, she is financially able to assist Mrs. Hall to raise and educated- her child, .

Re- cross examination of witness.

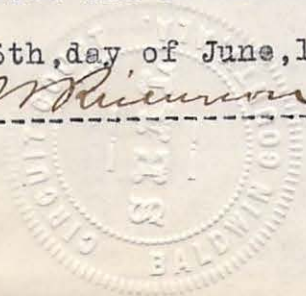
Any body that has been mistreated will show it, and Mrs Hall showed it, the reason I know Mr Hall mis treated her there was no one else but Mr. Hall there, to mistreat her and she wrote us that she had been mistreated. and was being mistreated, I never did visit them in their home, I never visited near their home, I did not see him slap her and all that know about it was she said so and I saw the bruise on her body, I saw her in the condition she came to the Hospital and heard what she said about it, I was not an eye witness to any of this,

Mrs John I Gray

Subscribed and sworn to before me

this 16th, day of June, 1920.

D. W. Richardson Register.



Joe King, a witness for defendant testified as follows,
My name is Joe King, I live at Lottie, Alabama, I lived about
 $\frac{1}{4}$ mile from Mr. and Mrs Hall, I didn't visit their house and I
am not related to either of them, I know the general reputation
of Mrs. J.D.Hall in the community in which she lives and it is good,
the people speak well of her as being a woman of good
character, I know the reputation of Mr. J.D.Hall in the community
in which he lived near Lottie it is bad, he would not
be a fit man to raise a 3 year old child, I have six children
and know what it is to raise girls, Mr. Hall didn't
work steady while he lived near Lottie he would work a
day or 2 a week, He is an able bodied man and if he worked steady
he could make \$50.00 or \$60.00 per month, as wages.

On cross examination witness testified as follows:

My statement as to his reputation is based on what I know and what
I have heard,, I don't know where Mr Hall was on those days
in the week other than the day or two he would work, I would
see him walking up and down the road every day he was not at work,
a man could not be working and walking up and down the road,
A man taking a message couldn't be what I call working.
a man could be working carrying a message but not every day
walking up and down the road, he was walking up and down the
road several times a day, I was doing my work and I do not
know that he was not working when I didn't see him walking
up and down the road. I am very friendly to Mrs. Hall I have
nothing against her, I am friendly toward Mr. Hall, I am

a good friend to one as other
Subscribed and sworn to

before me this 16th day of June

1920.

Joe King
-----Register.

The State of Alabama,)
In Circuit Court in Equity)

No John Daniel Hall, Complainant

vs

Nellie Gray Hall, Defendant

Messrs . Stone & Stone, Attys for Complainant:

Pursuant to an order of reference made in the above cause entitled aforesaid at the Spring Term 1920 of the Circuit Court of Baldwin County, I have appointed Wednesday the 16th of June at ten o'clock A. M. at my office for considering the matters thereby referred to me as Master in Chancery, at which time and place all parties concerned are to attend .

Witness T. W. Richerson register of said court this the 4th day of June 1920.

T. W. Richerson

Service accepted
for reference on
June 16. 1920
Stone & Stone
Solicitors
for complt.

June 4/1920.

Filed June 2nd/1920
D. W. Hillman
Singer

John Daniel Hall

No. 216 vs

Hellie Gray Hall

vs.

THE STATE OF ALABAMA,

Baldwin COUNTY.

CIRCUIT COURT, IN EQUITY.

This the 11th day of

February, 1920 19

In this cause it being made to appear to the Clerk of this Court by the affidavit of

John Daniel Hall

that the Defendant

Hellie Gray Hall

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant..... the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said

Hellie Gray Hall

to answer or demur to the Bill of Complaint in this cause by the 13th day of March 1920 19

or after thirty days therefrom a decree Pro Confesso may be taken against her,

[Signature] Register.

JOHN DANIELL HALL,
Complainant.

-vs-

NELLIE GRAY HALL,
Defendant.

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

No. _____

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me, Norborne Stone, a Notary Public, in and for said state and county, personally appeared John Daniell Hall, who is known to me and who, after being by me first duly sworn, deposes and says under oath;

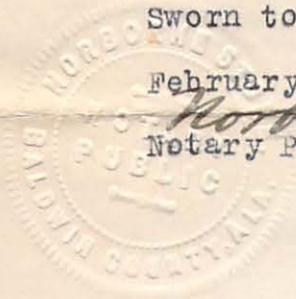
I am the complainant in the above styled cause wherein Nellie Gray Hall is the defendant. We are both over the age of twenty one years. I am a bona fide resident of Baldwin County, Alabama, where I have lived for the past nine years. Nellie Gray Hall's residence is unknown to me and cannot be ascertained by me after diligent inquiry on my part. When last heard from by me she was at Caladonia, Wilcox County, Alabama, but she cannot now be found there. In my belief she is now a non-resident of the state of Alabama and service my publication will be necessary in order to make her a party respondent to the above styled cause.

John Daniell Hall

Sworn to and subscribed before me this 11 day of

February, nineteen hundred and twenty (1920)

Norborne Stone
Notary Public, Baldwin County, Alabama.



Affidavit of non
residence of Deft

John Daniel Hall
Complainant

vs.

Felli Gray Hall
Defendant

Divorce Proceedings

Circuit Court, Equity Side
State of Alabama
Baldwin County

Filed in the office
this Feb 11 1930

T. W. Dickerson
Registrar



THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

County. }

No.

Term, 19.....

If witness wishes to charge for attendance he must present this Subpoena to the Register in Term time, or he will be barred.

To any Sheriff of the State of Alabama:

You are hereby commanded to summon

O. B. Cropper
Ernest Biggs Ed Green
Tim Green

personally to be and appear before the Register of said Court at the Court House thereof on.....
the..... *16* day of..... *June* 19 *20* , and from day to day until discharged
by due course of law, to give evidence and the truth to speak in behalf of the.....
in a cause now pending in said Court, wherein.....

John Daniel Hall Complainants
Nellie Gray Hall Defendants

and have you then and there this writ with your endorsement thereon.

Witness my hand, this..... *3rd* day of..... *June* 19 *20*

T. W. Richardson

Register.

Original

Beat No.

COMPLAINANT'S WITNESSES:

No. Page

THE STATE OF ALABAMA,

County.

CIRCUIT COURT, IN EQUITY.

Complainants,

vs.

Defendants.

REGISTER'S SUBPOENA.

DEFENDANT'S WITNESSES:

Issued..... 19.....

Register. ..

Received in office..... 19.....

Sheriff.

Executed this *June 4* 19 *20*

by serving a copy on.....

Ed. H. Brown
James B. Brown
Ed. H. Brown
Jim Greene
~~Sheriff~~

Deputy Sheriff.

complainant to the respondent for solicitor's fees and for alimony pendente lite.

Sixth: And this respondent is entitled to affirmative relief against the complainant and to that end would have this, her answer, taken as a cross bill and would further show:

1st: That since the marriage, as set forth in the second paragraph of the bill of complaint, the said complainant has committed adultery with divers persons whose names are unknown to this respondent.

2nd: This respondent left the complainant in the fall of 1919, because the complainant treated this respondent with such cruelty that she reasonably apprehended her from such violence upon her person as would be attended with danger to her life and health.

3rd: That after said marriage, the complainant became addicted to habitual drunkenness.

Wherefore this respondent prays that your Honor will decree that the bonds of matrimony heretofore existing between the respondent and complainant be forever dissolved, and that this respondent may be permitted to re-marry; and that respondent may be given the care, custody and control of said infant, Eva May Hall, and that said complainant may be required to pay to this respondent alimony in accordance with his ability and the condition and station in life of the respective parties. And if this respondent has not asked for the proper relief, she further prays that she might have such further and other relief in the premises as her case may require and as to your Honor may seem meet.

All of which matters this respondent is ready to aver, maintain and prove as this Honorable court shall direct.

S. Jenkins
Joseph F. Hogan
Solicitors for Respondent.

Complainant

NOTE: The ~~respondent~~ is required to answer the allegations of section "Six" of the above bill from paragraph One to Three inclusive, but not under oath, oath being hereby expressly waived.

S. Jenkins
Joseph F. Hogan
Solicitors for Respondent.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. CIRCUIT COURT, IN EQUITY.

Complainant.....

vs.

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.....
..... 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.....
..... is forever divorced from the said
..... for and on account of
.....
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.....
.....
..... as alleged in said Bill of Complaint;

It is further ordered, that the said.....
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.....
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.....

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

This day of 191.....

.....
Judge of the Circuit Court of Baldwin County.

No. 217.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

John Daniel Hall.

vs.

Nellie Gray Hall.

DECREE OF DIVORCE.

Filed in office this

day of 191

Register.

E. O. M.

The State of Alabama)

Baldwin County.)

In Equity, Circuit Court,
Baldwin County, Alabama.

John Daniel Hall,

Complainant,

vs.

Nellie Gray Hall,

Respondent.

This cause coming on to be heard in vacation was submitted upon the bill of complaint on behalf of complainant and in behalf of defendant answer and cross bill decree pro confesso and the depositions of witnesses for and in behalf of the Respondent as follows: T. M. Green, George Green, Mrs Nellie Gray Hall, Ernest Biggs, Dewitt Drew, Mary Wilson, Mrs John L. Gray, Joe King, R. M. Chambless, John Langham, Thomas N. Gentry, and F. F. Little, and testimony as noted by the Register; and upon consideration thereof the Court is of the opinion that complainant is not entitled to the relief prayed for in his bill of complaint, and it is therefore ordered, adjudged and decreed by the court that the said complainant be denied the relief prayed for in his bill of complaint.

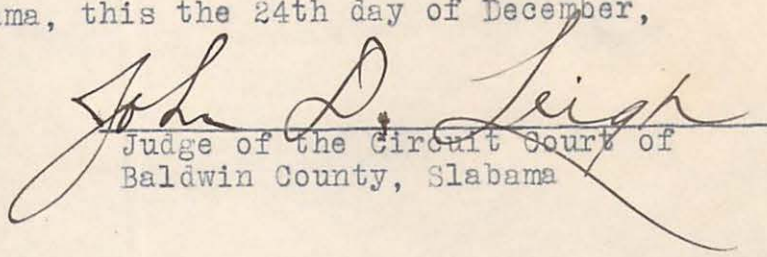
On consideration of the respondents answer cross bill and depositions aduced ~~XXX~~ in her behalf the Court is of the opinion that she is entitled to the relief prayed for in her answer and cross bill; it is therefore ordered, adjudged and decreed that Nellie Gray Hall is relieved of the bond of matrimony heretofore existing between the said John Daniel Hall and herself and the same so far as they relate to the said Nellie Gray Hall be and they are hereby dissolved and the said Nellie Gray Hall is forever divorced from John Daniel Hall for and on account of the extreme cruelty ^{of} ~~the~~ said John Daniel Hall to the said Nellie Gray Hall. It is further ordered that the said Nellie Gray Hall be and she is hereby permitted to contract marriage again. It is further ordered, that the said John Daniel Hall pay the cost herein taxed, for which execution

execution may issue, and if such execution is returned " no property found " then execution for such costs may issue against the said Nellie Gray Hall.

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

It is further ordered, adjudged and decreed that on account of the fact that it has been fully proven to the court that the said John Daniel Hall is a man of bad characted and not a fit person to have the custody and control of the child born unto them, but upon the other hand the court is of the opinion that the said Nellie Gray Hall is a fit person to have the control and custody of Eva May Hall, it is therefore ordered, adjudged and decreed by the Court that the custody, care, management and control of the said Eva May Hall be given absolutely to the said Nellie Gray Hall.

Dated at Brewton, Alabama, this the 24th day of December, 1920.


Judge of the Circuit Court of
Baldwin County, Alabama