

-----X
 GEORGE T. CROSS,)
 Complainant.)
)
 -vs-)
 DELLA MILLS CROSS.)
 Defendant.)
 -----X

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

No. _____

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, EQUITY SIDE,
 AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, IN EQUITY SITTING;

Comes your complainant, George Thomas Cross, and exhibits this his original bill of complaint for divorce for voluntary desertion and abandonment against the defendant, Della Mills Cross and for grounds for the same respectfully shows unto this honorable court as follows;

FIRST.

That the complainant is a bona fide resident of the state of Alabama and has been for more than three years next immediately preceding the filing of this bill and that he is over the age of twenty one years; that the defendant, Della Mills Cross, is a non-resident of the State of Alabama, is over the age of twenty-one years, and when last heard from resided in the State of Florida at Walnut Hill.

SECOND.

That complainant and defendant were married on to-wit, June 28th, 1914, at Walnut Hill, Florida and lived together as man and wife until, to-wit; December 26th, 1917.

THIRD.

That on, to-wit, December 26th, 1917, while residing at Brewton in Escambia County, Alabama, the defendant voluntarily deserted and abandoned your complainant without just cause or legal excuse and has, since that time, continued to desert and abandon him and has never returned to live with him since that time.

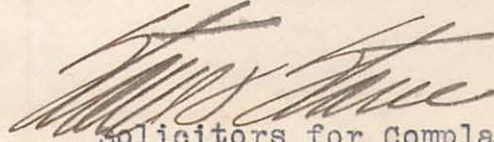
PRAYER FOR PROCESS.

The premises considered, your complainant prays that such order and decrees may be issued by this honorable court as to make the said defendant party respondent to this bill of complaint, requiring her to appear and plead, answer or demur, within the time required by law, under the pains and penalties of this court.

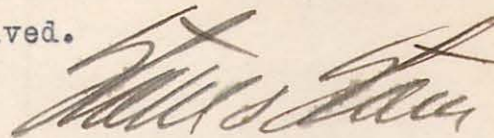
PRAYER FOR RELIEF.

That upon a final hearing of this cause, complainant prays that your honor will render, adjudge and decree that the bonds of

matrimony heretofore existing between the complainant, George Thomas Cross and the defendant, Della Mills Cross, be forever dissolved and that your complainant be again permitted to contract the marriage relation, if he so desires. And as in duty bound, he will ever pray, etc., etc.,


Solicitors for Complainant.

FOOT NOTE:- The defendant, Della Mills Cross, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "THIRD." both inclusive, but not under oath, answer under oath, being hereby expressly waived.


Solicitors for Complainant.

George Thomas Cross,

Complainant.

Complainant.....

vs.

Della Mills Cross.

Defendant.

Defendant.....

IN EQUITY,
CIRCUIT COURT OF
Baldwin COUNTY.

THE STATE OF ALABAMA,
Baldwin County. }

Personally appeared before me, T. W. Richerson Register of said Court,

in and for said County and State, N. C. Stone, of the firm of Stone & Stone, attorneys, one of the agents and solicitors for George Thomas Cross, the complainant.

agent of Complainant, who being duly sworn, deposes and says that he is informed and verily believes that

Della Mills Cross is a non-resident of the state of ~~Flori~~ Alabama and resides at Walnut Hill, Florida.

the Defendant ~~is the same as the complainant~~ not resident of ~~the State of Alabama and the County of~~

Defendant ~~cannot~~ be ascertained after reasonable effort.

and that said Defendant is, in belief of affiant, over twenty-one years of age.

N. C. Stone

Sworn to and subscribed before me, this 26th day of January 1920

T. W. Richerson
Register.

3

R

No.

AFFIDAVIT OF NON-RESIDENCE.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

George T. Cross,

Complainant.

vs.

Della Mills Cross.

Filed in office 26th day of

January 19 20

D. M. Ricewson

Register.

RECORDED

-----X
GEORGE T. CROSS,)
Complainant.)
-vs-)
DELLA MILLS CROSS.)
Defendant.)
-----X

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

No. _____

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, EQUITY SIDE,
AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, IN EQUITY SITTING;

Comes your complainant, George Thomas Cross, and exhibits this his original bill of complaint for divorce for voluntary desertion and abandonment against the defendant, Della Mills Cross and for grounds for the same respectfully shows unto this honorable court as follows;

FIRST.

That the complainant is a bona fide resident of the state of Alabama and has been for more than three years next immediately preceeding the filing of this bill and that he is over the age of twenty one years; that the defendant, Della Mills Cross, is a non-resident of the State of Alabama, is over the age of twenty-one years, and when last heard from resided in the State of Florida at Walnut Hill.

SECOND.

That complainant and defendant were married on to-wit, June 28th, 1914, at Walnut Hill, Florida and lived together as man and wife until, to-wit; December 26th, 1917.

THIRD.

That on, to-wit, December 26th, 1917, while residing at Brewton in Escambia County, Alabama, the defendant voluntarily deserted and abandoned your complainant without just cause or legal excuse and has, since that time, continued to desert and abandon him and has never returned to live with him since that time.

PRAYER FOR PROCESS.

The premises considered, your complainant prays that such order and decrees may be issued by this honorable court as to make the said defendant party respondent to this bill of complaint, requiring her to appear and plead, answer or demur, 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, complainant prays that your honor will render, adjudge and decree that the bonds of

matrimony heretofore existing between the complainant, George Thomas Cross and the defendant, Della Mills Cross, be forever dissolved and that your complainant be again permitted to contract the marriage relation, if he so desires. And as in duty bound, he will ever pray, etc., etc.,

Stansley
solicitors for Complainant.

FOOT NOTE:- The defendant, Della Mills Cross, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "THIRD," both inclusive, but not under oath, answer and-
er oath, being hereby expressly waived.

RECORDED

Handwritten notes and signatures in the margin, including the name 'Stansley' and other illegible scribbles.

Stansley
solicitors for Complainant.

No. _____

Derrys Cross
Compet.

Deeds, ¹⁻² miles Cross
Left

Divorce Proceedings

Circuit Court - Equity.

State of Alabama
Baldwin County,

No. _____

Filed 1-26-72

J. M. Richardson

Register

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. Term, 191.....

George T Cross

Complainant.....

vs.

Della Mills Cross

Defendant.....

To *T W Richardson*, 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 *Richard J Burke*

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.

George T Cross
Richard J Burke
Solicitor for Complainant.

No. 219

Page

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

Geo W Cross

vs.

Dea Rice Cross

REQUEST FOR DECREE IN
VACATION.

Filed Oct 1st 20 1910

D. W. Richardson

Register

RECORDED

Recorded in Record

Vol. Page

Register

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY
No. 219 Spring Term, 1920

George P Cross Complainant

vs. Della Miller Cross Defendant

In this cause it appears to the Register that the order of publication here-
tofore made in this cause, was published for four consecutive weeks, commencing on the 29th day of
January, 1920, in the Baldwin Times
a newspaper published in Bay Minette Baldwin County, Alabama, that a copy of said order was posted at the Court
House door in Bay Minette Baldwin County, on the 29th day of
January 1920, and

And it now further appearing to the Register D. M. Rice, that the said
Della Miller Cross

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, there-
fore, on motion of Complainant, ordered and decreed by the Register that the
Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said

Della Miller Cross

This 5th day of April, 1920

D. M. Rice
Register.

400 R

No. 209 Page _____

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY

George Cross

vs.

Decca Miller Cross

DECREE PRO CONFESSO ON
PUBLICATION.

Issued April 5th 1920

J. W. McIlwain
Register.

Recorded in _____ Record

Vol. **RECORDED** Page _____

Register.

George T Cross

.....

Sella Mills Cross

.....

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,

*Deere pro confesso, and testimony
of complainant's witness.*

and in behalf of Defendant upon

.....
.....
.....

D. W. Richardson

Register

b R

No. 219.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Geo T Cross

vs.

Queen Mier Cross

NOTE OF TESTIMONY.

Filed in Open Court this 1st

day of Oct 1910

D W Ricumore

Register

RECORDED

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 219.

CIRCUIT COURT, IN EQUITY.

George T. Cross,

Complainant.....

vs.

Della Mills Cross,

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.....

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.....

George T. Cross,

is forever divorced from the said

Della Mills Cross,

for and on account of

Voluntary abandonment,

as alleged in said Bill of Complaint;

It is further ordered, that the said

George T. Cross,

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

George T. Cross,

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

Della Mills Cross,

It is further ordered, adjudged and decreed that said

George T. Cross

shall not again marry except to said

Della Mills Cross,

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said

Della Mills Cross, during the pendency of said appeal.

This 2nd day of October 1920

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

No. 217.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

George T. Cross,

vs.

Della Mills Cross,

DECREE OF DIVORCE.

Filed in office this

5th

day of

Oct

191*2*

T. W. McKeown

Register.

E. O. M.

(Recorded)
on minutes

Handwritten notes in right margin, including the word "Cross" and other illegible scribbles.

Copy

GEORGE T. CROSS,
Complainant,

NO.

IN EQUITY.

VS.
DELLA CROSS,
Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

Interrogatories to be propounded to C. W. EDWARDS,
BELL, and H. L. WILLIAMS, witnesses for complainant in the
above entitled cause.

1st. Are you personally acquainted with the parties to this
suit? If so, how long have you known them? Are they living together
now? Where do they reside?

2nd. How long has Mr. Cross been living in Alabama, to
your knowledge? In what Counties? Were both parties over the age
of twenty-one years at the beginning of this year when this bill was
filed?

3rd. Are the parties to this cause living together now?
If you say that they have separated, how long have they been living
apart? Has she returned to him since she left him in December, 1917?
Is your acquaintance with him such that if his wife had returned to
him you would have known it?

Stane & Stane
Rickard & Beebe
Solicitors for Complainant.

Complainant suggests the name of *Leon C. Brooks*
living at *Brewton*, Alabama, as a suitable
commissioner to take the testimony in this cause of witnesses Edwards
and Bell, residing at Flomaton, Alabama, and witness Williams, residing
at Brewton, Alabama.

Stane & Stane
Rickard & Beebe
Solicitors for Complainant.

The State of Alabama,

Baldwin County,

Circuit Court in Equity.

Complainant.

George T Cross/ vs Della Mills Cross. Defendant.

Motion is hereby made for a Decree Pro confesso against Della Mills Cross, Defendant, in the above stated cause, on the ground that more than thirty days have elapsed since service by publication in the Baldwin Times a news paper published in Baldwin County, Ala, was had upon said defendant; and that said service by publication was had 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 5th, day of April, 1920.

Stone Stone

Solicitors for Complainant.

RECORDED

After 5 days, return to
LEON G. BROOKS,
BREWTON, ALA.



*Receipt for
Deposition*

Mr. T. W. Richerson,
Bay Minette, Ala.

LEON G. & W. E. BROOKS
ATTORNEYS AT LAW
BREWTON, ALA.

Sept. 24, 1920

Mr. T. W. Rivherson,
Bay Minette, Ala.

Dear Sir:-

My fee for taking the testimony in the case of George T. Cross vs. Della Cross has been paid to me by Mr. Rickarby, and he requests that I notify you so that my charges will not be entered as a part of the costs in the case.

Yours very truly,

Leon G. Brooks

LGB/m

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

George T Cross
Complainant.....

vs.

Sella Mills Cross
Defendant.....

No.....

Now comes the Complainant by *Stone & Stone & Rieckley & Bube*

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.

George T Cross

And *he* suggests the name of *Mattie E Torbert*
who resides at *Mobile Ala* as a suitable person to be appointed Commissioner to take the testimony of said witness.....

This *29* day of *September* 19 *20*

Stone & Stone & Rieckley & Bube
Solicitor for *Complainant*

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. McCrum
Register.

No.

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL
EXAMINATION.

Les T Cross

vs.

Deer Mills Cross

Filed in office this

29

day of

Sept

19

22

D. J. Williams

Register.

George T. Cross,
vs.
Della M. Cross.

CIRCUIT COURT OF
BALDWIN COUNTY.

RICKARBY & FRAZER
LAWYERS
1008-1010 VAN ANTWERP BUILDING
MOBILE, ALABAMA

Deposition of George T. Cross,
witness for complainant in the
above entitled cause.

Mr. T. W. Richerson,
Register in Chancery,
Bay Minette, Alabama.

Filed Oct 1st 1920
T. W. Richerson
Register



~~Delivered by~~
Delivered by Register
Oct 1st 1920
T. W. Richerson
Register



After 5 days, return to
LEON G. BROOKS,
BREWTON, ALA.

Geo. T. Cross
vs.
Della Cross.

Deposition of
C. W. Edwards and
H. L. Wiggins.

Filed Sept 15 1920
H. L. Wiggins
Register

Mr. T. W. Richerson,

Register of the Circuit Court,

Bay Minette,

Alabama.



GEORGE T. CROSS,
Complainant,

NO.

VS.

IN EQUITY.

DELLA CROSS,
Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

Deposition of George T. Cross, witness for complainant in the above entitled cause, said witness having been by me first duly sworn to tell the truth, the whole truth and nothing but the truth, and the parties to this cause having had notice of the time and place of this examination, testified as follows:

GEORGE T. CROSS.

I am the complainant in this cause. I am over the age of twenty-one years, and when this bill was filed was residing in Fairhope, Baldwin County, Alabama. Since that time I have moved to Calvert in Mobile County. I was married on June 28, 1914, to the respondent at Walnut Hill, Florida. She is over the age of twenty-one years and resides out of the State of Alabama. We came to Alabama about six months after our marriage and have lived in Alabama since then and up to December 26, 1917. Part of the time we lived in Mobile, part in Baldwin and part in Escambia Counties, but the actual separation took place in Wilcox County where we were temporarily staying. She left me of her own accord and went back to live with her father in Florida and has never been back since. I have seen her once or twice since then but only just to speak to her, and we have never resumed marriage relations. We have been living separate and apart since December, 1917, now a little more than two years. She had no just cause for leaving me and has never asked to come back. I am now and have been all my life, a bona fide resident of the State of Alabama.

G. T. Cross

I, Natalie C. Torbert, the commissioner in the commission hereto annexed, issued out of the Honorable the Circuit Court of Baldwin County, Alabama, in the case of George T. Cross versus Della M. Cross, on the 29th day of September, 1920, hereby certify that under and by virtue of the powers conferred upon me by said commission I called and caused said witness hereinbefore mentioned to come before me at 1010 Van Antwerp Building, Mobile, Alabama, on this day; that said witness was made known to me to be the witness named in the commission; that he was duly sworn by me as hereinbefore stated; and his testimony was taken down by me and reduced to writing in as nearly the exact language of said witness as might be, and that he attached his signature to his deposition in my presence. I further certify that I am not of counsel or of kin to either party to this suit, nor am I in anywise interested in the outcome of the same.

Witness my hand this the 30th day of September, 1920.

Natalie C. Torbert,
Commissioner.

The State of Alabama,

CIRCUIT COURT.

Baldwin COUNTY.

Equity Division.

To *Mattie C. Torbert*

or such of you as may act herein, of *Mobile* County, State of *Alabama*, Greeting:

KNOW YE, That we, reposing confidence in your integrity, skill, and ability have appointed you Commissioners to take the testimony of

George T. Cross

material witness in a suit now pending in your *Circuit* Court of *Baldwin* County, wherein *George T. Cross*

Plaintiff, and *Della Mills Cross* is

Defendant, and we hereby authorize and empower you to call and cause to come before you *George T. Cross*

the said witness and *his* deposition on the Holy Evangelists to take, as well for the *Complaint* as for the *Defendant* touching *his* knowledge of the matters and things in controversy in said suit, which deposition, when so taken, shall be signed by said witness and certified by such of you Commissioners as may act herein; and you are further commanded, the deposition, when so taken, with this commission, to return under your hands and seals to the Clerk of said Court, with all convenient speed, and any one or more of you Commissioners, are authorized to act alone in the premises.

Witness my hand, this *29* day of *September* 19*10*

Witness' Fees, - - - \$

Commissioners' Fees, \$ *2.50* *not paid* *M. B. Peterson* Clerk.

5-20 R

No.
The State of Alabama,
Madison County.

CIRCUIT COURT,
Equity Division.
George W. ...

vs. Plaintiff,
Hella Mies ...

Defendant.

COMMISSION TO TAKE DEPOSITION ON SET
INTERROGATORIES.

Issued this 29th day of
Sept 1920
D. Mies ... Clerk.

WITNESSES:
Geo. A. ...

MARSHALL & BRUCE CO., NASHVILLE

DIRECTIONS:

TO THE COMMISSIONERS IN EXECUTING AND RETURNING THE COMMISSION.

1. If the time and place of executing the commission are not named therein, the Commissioners will subpoena the witness to appear before them at such time and place as they may appoint, and administer the oath to witness.
2. Either the Commissioners, witness, or some impartial persons, must reduce the answer of witness to writing, as near as may be in the language of the witness.
3. State the caption of the cause at the beginning, and then the following heading or title:

By virtue of the Commission hereto annexed, issued from the office of the Clerk of the Circuit Court of _____ County, State of Alabama, we, the Commissioners therein named, have called and caused to come before us the said A B, the witness named in said commission, on this _____ day of _____ 191____, at the _____; and having duly cautioned and sworn the said witness to speak the truth, the whole truth, and nothing but the truth, A B, the said witness, depose and saith as follows:

First.—To first interrogatory he saith:
 Second.—To second interrogatory he saith:
 First.—To first cross-interrogatory he saith:

4. When the deposition is finished, it must be subscribed by the witness and certified as follows:

We, C D and E F, the Commissioners in said commission named, do hereby certify that the foregoing testimony and answers, taken down and written by us in the words of the witness, A B, were read over to him; that he assented, swore to, and subscribed the same in our presence, at the time and place herein mentioned; that we have personal knowledge of the personal identity of said witness [or, if unacquainted with the witness, that proof hath been made before us of the identity of the said witness]; that we are not of counsel or kin to either of the parties to said cause, nor interested in the event thereof. And we inclose the said testimony, together with said commission and the interrogatories, direct and cross, to the said Clerk of the Circuit Court whence the same emanated, as our full execution of said commission.

Given under our hands and seals, this _____ day of _____ 191____

-----[L. S.]
 -----[L. S.]

Next unite the commissions, interrogatories, and answers together, with wafers or tape; second, envelope all, sealed with three seals; third, write each Commissioner's name across each seal; and, fourth, write on the envelope the names of the parties and witnesses, and direct it thus:

C D v. E F _____ DEPOSITION OF A B	To _____ Esq., CLERK OF THE CIRCUIT COURT. _____ _____ County, Ala.
---	--

The package may be sent by mail or private conveyance.

Bay Minette, Ala.,

February 28th, 20

M

George Thomas Cross, Complainant
vs
Della Mills Cross, Complainant

NOTICE TO NON-RESIDENT
Stone & Stone, Attys

THE BALDWIN TIMES

ABNER J. SMITH, PROPR.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

All Bills Must Be Paid Within 30 Days

To publishing above Non-Resident Notice in The Baldwin
Times in issues of January 29th and February 5th,
12th, 19th, 1920
200 words @ $4\frac{1}{2}$ ¢ per word.....

5.00

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE NO. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

NON-RESIDENT NOTICE

George Thomas Cross, Complainant

vs

Della Mills Cross, Defendant

Was published in said Newspaper for 4 consecutive weeks

in the following issues:

Date of first publication	<u>January 29th, 1920</u>	Vol.	<u>30</u>	No.	<u>50</u>
“ “ second “	<u>February 5th, 1920</u>	Vol.	<u>30</u>	No.	<u>51</u>
“ “ third “	<u>February 12th, 1920</u>	Vol.	<u>30</u>	No.	<u>52</u>
“ “ fourth “	<u>February 19th, 1920</u>	Vol.	<u>31</u>	No.	<u>1</u>

Subscribed and sworn to before the undersigned

this 2nd day of March 1920.

T. W. Richerson
Clerk Circuit Court.
Baldwin, Co., Ala.

Abner J. Smith
Publisher.

Notice to Non-Residents.

George Thomas Cross, Complainant, vs. Della Mills Cross, Defendant. The State of Alabama, Baldwin County. In Equity. Circuit Court of Baldwin County.

In this cause it being made to appear to the Judge of this Court, in Term time, by the affidavit of N. C. Stone, one of the members of the firm of Stone and Stone, Attorneys, and agent for George Thomas Cross, the complainant, that the Defendant, Della Mills Cross, is a non-resident of the State of Alabama, and when last heard from resided in Walnut Hill, Florida, 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 Della Mills Cross to answer or demur to the Bill of Complaint in this cause by the 29th day of February, 1920, or after thirty therefrom a decree Pro Confesso may be taken against her.

This 26th day of January, 1920.
T. W. Richerson,
Register Circuit Court, Equity Side,
Baldwin County, Ala. 50-4t
Stone and Stone,
Solicitors for Complainant.

The State of Alabama,)

CIRCUIT COURT.

Baldwin, COUNTY.)

E-QUIITY Division.

To Leon G Brooks,

or such of you as may act herein, of Baldwin County, State of Alabama, Greeting:

KNOW YE, That we, reposing confidence in your integrity, skill, and ability have appointed you Commissioners to take the testimony of C.W. Edwards, and Bell, residing at Flomaton, Ala., H.L. Miggins, residing at Brewton, Ala.,

material witness es in a suit now pending in our Circuit Court of Baldwin County, wherein George T. Cross

Plaintiff, and Delia Cross,

Defendant, and we hereby authorize and empower you to call and cause to come before you C.W. Edwards, Bell and Miggins,

the said witness es and their deposition on the Holy Evangelists to take, as well for the Complainant as for the touching their knowledge of the matters and things in controversy in said suit, which deposition, when so taken, shall be signed by said witness and certified by such of you Commissioners as may act herein; and you are further commanded, the deposition, when so taken, with this commission, to return under your hands and seals to the Clerk of said Court, with all convenient speed, and any one or more of you Commissioners, are authorized to act alone in the premises.

Witness my hand, this 27th day of July, 1920, 191

Witness' Fees, - - - \$

Commissioners' Fees, \$

J. W. Rimmer Clerk.

GEORGE T. CROSS,
Complainant,

VS.
DELLA CROSS,
Respondent.

NO.

IN EQUITY.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

Interrogatories to be propounded to C. W. EDWARDS,
B. J. BELL, and H. L. ^{Wiggins}~~Williams~~, witnesses for complainant in the
above entitled cause.

1st. Are you personally acquainted with the parties to this
suit? If so, how long have you known them? Are they living together
now? Where do they reside?

2nd. How long has Mr. Cross been living in Alabama, to
your knowledge? In what Counties? Were both parties over the age
of twenty-one years at the beginning of this year when this bill was
filed?

3rd. Are the parties to this cause living together now?
If you say that they have separated, how long have they been living
apart? Has she returned to him since she left him in December, 1917?
Is your acquaintance with him such that if his wife had returned to
him you would have known it?

Stone & Stone
Richard & Bube
Solicitors for Complainant.

Complainant suggests the name of *Leon G. Brooks*
living at *Brewton*, Alabama, as a suitable
commissioner to take the testimony in this cause of witnesses Edwards
and Bell, residing at Flomaton, Alabama, and witness ^{Wiggins}~~Williams~~, residing
at Brewton, Alabama.

Stone & Stone
Richard & Bube
Solicitors for Complainant.

GEORGE T. CROSS, : IN THE CIRCUIT COURT OF
COMPLAINANT, : BALDWIN COUNTY, ALABAMA,
VS. : IN EQUITY.
DELLA CROSS, :
RESPONDENT. :

By virtue of the commission hereto annexed, issued from the office of the Register of said Court, in Equity, I, the Commissioner therein named, have called and caused to come before me the said C. W. Edwards and H. L. Wiggins, the witnesses named in said commission, on this the 6th day of September, 1920, at my office in the City of Brewton, Alabama; and having duly cautioned and sworn the said witnesses to speak the truth, the whole truth, and nothing but the truth, C. W. Edwards and H. L. Wiggins, the said witnesses, depose and saith as follows:

Witness C. W. Edwards, being first duly sworn, deposes and says:
To the first interrogatory he saith:

I am personally acquainted with G. T. Cross and Della Cross. I have known G. T. Cross about 14 years; I have known Della Cross about 3 years. ~~know~~ they are not now living together. G. T. Cross resides in Alabama, I do not know his exact place of residence. I do not know where Della Cross now resides.

To the second interrogatory he saith:

Mr. Cross has been living in Alabama ever since I have known him. Both of the parties to the suit were over 21 years of age at the beginning of this year.

To the third interrogatory he saith:

The parties to this suit are not now living together. They separated in December 1917. Della Cross has not returned to G. T. Cross to live with him since she left him in December, 1917. Yes, my acquaintance with these parties is such that if his wife had returned I would have known it.

C. W. Edwards

Witness H. L. Wiggins, being first duly sworn, deposes and says:
To the first interrogatory he saith:

I am personally acquainted with the parties to this suit. I have known G. T. Cross for about 20 years; and I have known Della Cross ever since she married G. T. Cross. They are not now living together. G. T. Cross resides in Baldwin County, Alabama. I don't know where Della Cross resides.

To the second interrogatory he saith:

Mr. Cross has been living in Alabama all of his life. Nearly all of the time he has lived in Escambia County, but more recently he has resided in Baldwin County. Both parties were over the age of 21 years at the beginning of this year.

To the third interrogatory he saith:

The parties to the suit are not now living together. They have been living apart since December, 1917. Della Cross has not returned to live with G. T. Cross since she left him in December, 1917. My acquaintance is such that if his wife had returned I would have known it.

H. L. Wiggins

I, Leon G. Brooks, the commissioner in said commission named, do hereby certify that the foregoing testimony and answers, taken down by me in the words of the witnesses, C. W. Edwards and H. L. Wiggins, were read over to them; that they assented, swore to and subscribed the same in my presence, at the time and place herein mentioned; that I have personal knowledge of the personal identity of said witnesses; that I am not of counsel or kin to either of the parties to said cause, nor interested in the event thereof.

And I enclose the said testimony, together with said commission and the interrogatories, direct and cross, to the said Register of the Circuit Court, in Equity, whence the same emanated, as my full execution of said commission.

Given under my hand and seal this the 14th day of September, 1920.

Leon G. Brooks. (Seal)