

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Louis B. Davis Complainant

vs.

Roberta Davis Defendant

Oral examination before the Register of the following witnesses:

Louis B. Davis and Joel E. Smith

who reside in Alabama, said examination being conducted in Baldwin Alabama,

on this the 20th day of May, 1920, and there being present

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

My name is Louis B. Davis. I am over twenty-one years of age and reside in Baldwin County, Alabama, and have resided in Baldwin County, Alabama for a period of more than three years next before the filing of this bill of complaint; that Roberta Davis is over twenty-one years of age and a resident of Mobile County, Alabama, and resides at Magazine, in said County.

Roberta Davis and myself were lawfully married in Baldwin County, Alabama, on or about September 1st, 1918, and lived together as man and wife until about June 1st, 1919; At this time the said Roberta Davis committed adultery with a man by the name of Green. They were in Magazine, Alabama in a room by themselves on a cot when I saw them commit the said act of adultery. She had been allowing this man Green to hang around her house all the time and he is still living with her now. I saw them on the cot together

and she was in his lap. It was practically dark in the room and I could not see all that was going on. They were in the room by themselves and had been lying down together. She told me that she had her a man and I had better get me another woman for she was going to live with Green. This happened about June 1st, 1919. I did not connive nor have I condoned the act of adultery.

*Subscribed and sworn to before me this 20th day of May 1920
W. H. [unclear] Register*

Louis B. Davis

Testimony of Joel E. Smith:

My name is Joel E. Smith. I know Louis B. Davis and Roberta Davis. They are man and wife. I have been with Louis B. Davis since he left his wife. I know that Roberta Davis was very familiar with a man by the name of Green during last summer, 1919. I know that Roberta Davis and the man by the name of Green stayed in the house together most of the summer. Louis B. Davis and Roberta Davis separated on or about June 1st, 1919.

Subscribed and sworn to before.

Joel E. Smith

me this 20th day of May 1920

W. H. [unclear] Register

3rd R

No. _____ Page _____

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Louis B Davis

vs. Complainant,

Roberta Davis

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of Witness

for Complainant

Filed 20th day of May, 1920

Published by order of the Court,

day of _____, 19____

J. M. McCremon

Register.

Louis B. Davis,)
Complainant.)
vs)
Roberta Davis,)
Defendant.)

IN THE CIRCUIT COURT,

BALDWIN COUNTY, ALA.

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

Dated this 15th day of April, 1920.

Witnesses:

W. W. McQuire.

J. M. Slaughter

Roberta Davis.

STATE OF ALABAMA,)
BALDWIN COUNTY.)

IN THE CIRCUIT COURT,
BALDWIN COUNTY, ALA.

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

Your Orator, Louis B. Davis, respectfully represents and shows unto your Honor as follows:

1st. That he is a bona fide resident citizen of the county of Baldwin and State of Alabama, and resided in said County and State for a period of more than three years next before the filing of this bill of complaint, and that he is over the age of twenty-one years.

That Roberta Davis is a resident of Mobile County, Alabama, residing at Magazine, Alabama, and that she is over twenty-one years of age.

2nd. That your Orator and the said Roberta Davis were married in Baldwin County, Alabama, on or about September 1st, 1918, and lived together as man and wife until, to-wit: June 1st, 1919; that the said Roberta Davis committed the act of adultery with a man by the name of Green at which time we separated and have not lived together since, nor did your Orator connive or condone the said act of adultery.

PRAYER FOR PROCESS.

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

PRAYER FOR RELIEF.

That upon the final hearing of this cause your Honor will grant unto your Orator an absolute divorce from the said Roberta Davis.

That if your Orator is mistaken in the relief above prayed for then your Honor will grant unto him such

otherm further, different and general relief as he may in justice and equity be entitled to receive, he will ever pray, etc.

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

FOOT NOTE;

The respondent, Roberta Davis, is required to answer each and every allegation of the foregoing Bill of Complaint from 1st to 2nd, both inclusive, but not under oath, answer under oath being hereby expressly waived.

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

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 224. CIRCUIT COURT, IN EQUITY.

Louis B. Davis Complainant

vs. Roberta Davis 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

Louis B. Davis is forever divorced from the said

Roberta Davis for and on account of

Adultery

as alleged in said Bill of Complaint;

It is further ordered, that the said Louis B. Davis

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 Louis B. Davis

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 Roberta Davis

It is further ordered, adjudged and decreed that said Louis B. Davis

shall not again marry except to said Roberta Davis

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

This 2nd day of June 1910

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

No. 224.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Louis B Davis

vs.

Roberta Davis

DECREE OF DIVORCE.

Filed in office this 2nd

day of June 1912

W. H. Riccison
Register.

E. O. M.

Recorded On Minutes

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 Roberta Davis

of Mobile, 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

Louis B Davis,


against said

Roberta Davis

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 12th day of April

1920. 191



Register.

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

Copy

copy

Serve on Roberta Davis, Magazie, Mobile Co.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.

SUMMONS.

Louis B Davis

vs.

Roberta Davis

Page and Moorer.

Solicitor for Complainant.

Recorded in Vol. Page

Received in office this

day of 191

Sheriff.

Executed this day of

..... 191

by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff.

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 Roberta Davis

of Mobile, 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

Louis B Davis,

against said Roberta Davis

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 12th day of April

1920. 191



Register.

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

original

copy

Serve on Roberta Davis, Magazie, Mobile Co. THE STATE OF ALABAMA,

BALDWIN COUNTY.

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.

SUMMONS.

Louis B Davis

vs.

Roberta Davis

Magazie, Mobile Co.
Att

Page and Moorer.

Solicitor for Complainant.

Recorded in Vol. Page

Received in office this

day of 191

Sheriff.

Executed this day of

191

by leaving a copy of the within Summons with

Defendant

Sheriff

By

Deputy Sheriff.