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Nicholas L Owen, Complainant)
vs)
Sudie A Owen, Respondent)

In The Circuit Court of Baldwin
County, Alabama.
In Equity .

To the Honorable Francis W Hare, Judge of the Twenty First Judicial Cir -
cuit of Alabama, which includes Baldwin County:

Humbly complaining, your Orator, Nicholas L Owen, respectfully repre -
sents unto to your Honor as follows:-

1. Your Orator, the said Nicholas L Owen, and ~~Sudie~~ A Owen, the respon -
dent were legally married in the County of Montgomery, Alabama, on the
26th day of May, 1917 and they lived together as husband and wife until
towit, the 18th day of April 1932, when the respondent, the said ~~Sudie~~ A
Owen, without any legal or just cause therefor, voluntarily abandoned -
your Orator and since said abandonment she has failed and refused to
resume marital relations with your Orator. At which time of abandonment
of your Orator by respondent, they were living at Greenville, Alabama, in
Butler County; that respondent left your Orator and did not say where she
was going and that is the last time, Your Orator has seen or heard of
respondent and her post office address and residence is now unknown to
your Orator ; that at this time, towit, April 18th, 1932, your Orator -
moved to Baldwin County, Alabama and has resided in Baldwin County ever
since and that he is now residing ^{at} Robertsdale, Alabama, insaid Baldwin
County.

2. That your Orator, the said Nicholas L Owen and the respondent, the
said ~~Sudie~~ A Owen, are both over the age of twenty one years and your
Orator is forty five years of age and for the past three years and more
has been a bona fide resident of the state of Alabama and since April 18th
1932 has been a bona fide resident of Baldwin County, state of Alabama
and the respondent is at present a nonresident of the state of Alabama
and whose post office address is to your Orator unknown.

Wherefore, Your Orator prays that the respondent, the said ~~Sudie~~ A
Owen, by proper process of this honorable court be brought before this
honorable court and directed to answer the charges herein made against her
under the rules of this Honorable court; that she may be made a party de -
pendant to this Bill of Complaint and that upon a final hearing of the -
evidence in the cause, that your Honor will order , adjudge and decree -
that the bonds of matrimony heretofore existing between your Orator and
the respondent, the said ~~Sudie~~ A Owen be forever dissolved and that -

your Orator be permitted to marry again and that he be granted such other and further relief as may in equity and good conscience seem meet and proper to your Honor.

And your Orator will ever pray etc .

B. Jenkins

Solicitor for the Complainant .

Foot Note:

The respondent is required to answer each and every paragraph of the foregoing Bill of Complaint from item 1 to item 2 inclusive, but not under oath, her oath to her answer is hereby expressly waived .

S. Jenkins

Solicitor for the Complainant .

CHANCERY EXECUTION

BILL OF COSTS

No. 64

Nicholas L. Owen vs. Sudie A. Owen

Plaintiff

Defendant

Table with columns: FEES OF REGISTER, Dollars, Cents, Brought Forward, and a final column for totals. Includes items like 'Filing each bill and other papers', 'Issuing each subpoena', 'Serving and returning subpoena on deft.', etc.

The State of Alabama, Baldwin County, Circuit Court, In Equity Term, 193... To Any Sheriff of the State of Alabama—GREETING: You are hereby commanded, That of the goods and chattels, lands and tenements of... Defendant... you cause to be made the sum of... Dollars, which... Plaintiff... recovered of... on the... day of... 193... by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of... Dollars, costs of suit, and have the same to render to the said... and make return of this Writ and the execution thereof, according to law. Interest from... 193... to date of collection. Witness my hand, this... day of... 193... Register.

State of Alabama)
Baldwin County))

Before me, John G Chason, a Notary Public in and for said state and county, personally appeared Nicholas L Owen,, who being by me first duly sworn under oath says that he is the complainant in the cause of Nicholas L Owen, Complainant vs Sallie A Owen, Respondent, now pending in the Circuit Court of Baldwin County, Alabama, that he is a bona fide citizen of Baldwin County residing at Robertsdale in said county; that he is informed and believes and upon such information and belief states that the respondent, the said Sallie A Owen is over the age of twenty one years and is a nonresident of the state of Alabama, but whose exact residence and whereabouts is unknown to affiant .

Nicholas L Owen

Subscribed and sworn to before me this 26th day of June 1934

John Chason
Notary Public for Baldwin County, Alabama.

RECORDED

The State of Alabama } Circuit Court of Baldwin County, Alabama,
 Baldwin County } (In Equity)

Nicholas L. Owen, _____ COMPLAINTANT

VS.

Sudie A. Owen, _____ RESPONDENT

I, _____ M. A. Stone, _____

as Register and Commissioner _____

have called and caused to come before me _____ John Owen, Ethel Hyde, and _____

Nicholas Owen, _____

witnesses named in the requirement for Oral Examination, on the _____ 30th day of _____ October, _____ 1934, at the office of _____ M. A. Stone, Clerk, _____

in _____ Bay Minette _____, Alabama, and having first sworn said witness ~~es~~ to speak the

truth, the whole truth, and nothing but the truth, the said _____ Nicholas Owen, _____

_____ doth depose and say as follows:

My name is Nicholas L. Owen, I live at Robertsdale, in Baldwin County. I have been a resident of Baldwin County for ~~the past three~~ ^{over} years. I am 45 years of age. Sudie A. Owen and myself were married on the 26th day of May, 1917. We were married in the city of Montgomery, Alabama. We lived together as husband and wife until to-wit:- the 18th day of April, 1932, when the respondent, the said Sudie A. Owen, without any legal excuse or just cause therefor voluntarily abandoned me. And since said abandonment, the said Sudie A. Owen, has failed and refused to resume marital relations with ~~him~~. At the time of her abandonment of me, we were living at Greenville, Alabama. At this time, to-wit the 18th day of April, 1932, Sudie A. Owen left and did not say where she was going., and I have not seen her since. And I do not know where she now resides. But to the best of my knowledge and belief she is a non-resident of the State of Alabama, and on such information and belief I state that she is a non-resident of this State, and whose post office address I do not know. Her age is about 40 years. We had no children, as a result of this marriage. I am a bona fide resident of Alabama, now residing in Robertsdale, Baldwin County, Alabama.

Nicholas L. Owen

MRS. ETHEL HYDE.

My name is Mrs. Ethel Hyde, and I now reside at Robertsdale, in Baldwin County, Alabama. I have know Nicholas L. Owen all my life, and I will soon be 30 years old. And I knew his wife, Sudie A. Owen. I knew them when they lived in Greenville, Alabama as I lived near there myself and frequently saw both parties. I know when they married in May 1917 and knew that they lived together as husband and wife until the 18th day of April 1932. At this time Sudie Owen voluntarily abandoned

The State of Alabama, { No. 64 CIRCUIT COURT IN EQUITY
Baldwin County }

Nicholas L. Owen Complainant
vs.
Sudie A. Owen Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the 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 complainant is forever divorced from the Defendant, on account of Abandonment,

It is further ordered, that the said Nicholas L. Owen 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 Nicholas L. Owen 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 Sudie L. Owen

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

This 10th day of November 1934

F. W. Hare

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA {
BALDWIN COUNTY } CIRCUIT COURT, IN EQUITY

I, _____, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the _____ day of _____ 9____,

in the cause of _____

Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the _____ day of _____, 19____

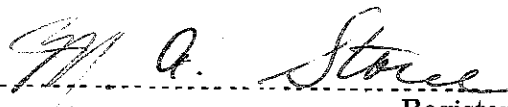
Register

NOTICE TO NON-RESIDENT.

Moore Ptg. Co—Bay Minette.

_____ _____ <u>Nicholas L. Owen</u> No. <u>64</u> _____ _____ vs. <u>Sudie A. Owen</u> _____ _____	{	The State of Alabama, _____ <u>Baldwin County.</u> _____ Circuit Court, in Equity. _____ This the <u>20th</u> day of _____ <u>August, 1934, 192</u>
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In this cause it being made to appear to the Clerk of this Court by the affidavit of
Nicholas L. Owen
 that the Defendant Sudie A. Owen
 is a non-resident of the State of Alabama and whose residence is unknown
 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 publish-
 ed in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring
Sudie A. Owen the said Defendant
 to answer or demur to the Bill of Complaint in this cause by the 20th day of
September 1924 or after thirty days therefrom a decree Pro Confesso may be
 taken against her.


 O. Stone
 Register.

NICHOLAS I. OWEN

vs.

SUDIE A. OWEN

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, _____
Affidavit of Non-residency, Notice to Non-resident, Proof of _____
Publication, and Publishers Certificate, _____
Oral Deposition of Nicholas I. Owen, John Owen, and Ethel Hyde _____

and in behalf of Defendant upon _____

M. A. Stone

Register.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
No. 64 October Term, 19234.

Nicholess L. Owen Complainant.
vs. Sudie A. Owen Defendant.

In this cause it appears to the Register, M. A. Stone, that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 23rd day of August, 19234, in the Baldwin Times a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 23rd day of August, 19234, and

And it now further appearing to the Register M. A. Stone, that the said Sudie A. Owen,

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register M. A. Stone, that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Sudie A. Owen, Defendant.

This 29th day of October 1934

M. A. Stone Register.

THE STATE OF ALABAMA, }
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 64 Oct., Term, 1934

Nicholas L. Owen, Complainant

Vs.

Sudie A. Owen, Defendant

Motion is hereby made for a Decree Pro Confesso against

Sudie A. Owen Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 29th day of October 1934

S. C. JENKINS

Solicitor.

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Published Every Thursday

THE BALDWIN TIMES

PUBLISHED IN THE LAND OF THE GOLDEN SATSUMA

SUBSCRIPTION \$2.00 PER YEAR IN ADVANCE
ADVERTISING RATES GIVEN ON APPLICATION

R. B. Vail
Editor and Proprietor

BAY MINETTE, ALA.

Oct. 31st 1934

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

T. L. C. Vail....., being duly sworn, deposes and says that he is
the ~~Publisher~~ ^{Printer} of THE BALDWIN TIMES, a Weekly Newspaper published at Bay
Minette, Baldwin County, Alabama; that the notice hereto attached of

Nicholas L. Owen vs. Sudie A. Owen.....

All County officers with whom the
be increased to \$50,000.00
the Commission that this bond
by the
Affidavit of Nicholas L. Owen, that the
Defendant, Sudie A. Owen is a non-
resident of the State of Alabama and
whose residence is unknown and fur-
ther, 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,
beginning Sudie A. Owen, the said De-
fendant to answer or demur to the
Bill or Complain in this cause by the
1st day of September, 1934, or after
thirty days therefrom a decree Pro
Confesso may be taken against her.
M. A. STONE, Register 30-4tp
of 00

Was published in said Newspaper for 4 consecutive weeks in the following issues:
August 23 1934 Vol. 45 No. 30
" 30 " Vol. 45 No. 31
Sept. 6 " Vol. 45 No. 32
" 13 " Vol. 45 No. 33

Subscribed and sworn before the undersigned this 31 day of October

October 31 1934
M. A. Stone
Clerk

T. L. C. Vail
Publisher & Printer

her husband, Nicholas L. Owen. She left him without any just cause and did not return to live with him and has not done so since she abandoned him and left his home in Greenville on the 18th day of April, 1932. It was the latter part of April 1932 that Nicholas L. Owen left Greenville, and moved to Baldwin County, where he has lived ever since. And since said time he has lived here ever since as a citizen of Baldwin County. I have been living in Baldwin County, About 18 months. I know the time, or about the time that Nicholas Owen left Greenville, and came to Baldwin County. Nicholas L. Owen, and Sudie Owen are both over 21 years of age. Nicholas L. Owen resides at Robertsdale, Alabama. I do not know the present post office address of Sudie A. Owen when she left Greenville, she just disappeared, and to best information and belief of mine she is a non-resident of the State of Alabama. I am quite sure I would have heard of her had she been in the State. I knew her quite well and knew her people and friends at Greenville, and I am sure that if she had returned to the State or was a resident of the State I would have heard of her. Therefore I would say on information and belief that Sudie A. Owen is at present a non-resident of the State.

Mrs Ethel Hyde

JOHN OWEN.--

My name is John Owen, and I reside at Bay Minette, Alabama, in Baldwin County. I have been residing in Baldwin County for nine years. I formerly lived in Butler County, and I was raised in that County. I know Nicholas L. Owen, and I have know him all of his life. Me and him are cousins. I know about the time he married, and that he and Sudie Owen lived together as husband and wife until the 18th day of April 1932, or about that time; When Nicholas L. Owen moved down here to Baldwin County. He had been living in Greenville, Alabama, but when he moved to Baldwin County, his wife refused and failed to come with him and voluntarily abandoned him, and did so without and reasonable excuse or any just will cause therefore. I know that Nicholas Owen treated his wife and tried to do right all the time. Nicholas L. Owen is 45 years old and resided now at Robertsdale, Alabama. He has been a resident of Baldwin County, for over 2 years. He has been a bona fide resident of the State of Alabama for all of his life. His Wife, Sudie A. Owen, was something about 40 years of age. Where she resides now I do not know, but to my best belief and information, she is a non-resident., of the state of Alabama.

John Owen

~~RECORDED~~

64

No. 64

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.
Baldwin County, Ala.

VS

DECREE OF DIVORCE

Filed in office this 11 th

day of Nov, 19 34

W. A. Stone
~~Register~~ Register.

E. O. M.