

STATE OF ALABAMA.

BALDWIN COUNTY.

Before me Frank S Stone a Notary Public in and for said County and State, personally appeared Zella Mc Cormack Gibson, who after being by me duly sworn doth depose and say under oath, that she is the complainant in a certain suit in the Chancery Court against Arthur Gibson for divorce, that both she and the said Arthur ~~xxxxxxx~~ <sup>Gipson</sup> are over the age of twenty one years, and that the said Arthur ~~xxxxxxx~~ <sup>Gipson</sup> is a non resident of the The of Alabama, and when last heard from resided in Detroit Michigan, but at what address affiant does not know although she has made diligent inquiry to no avail.

That affiant is now and has been for more than three years next immediately preceding the filing of this bill of complaint a Bona Fide resident of Baldwin County State of Alabama.

Zella McCormack Gibson.

Subscribed and sworn to before me this

Dec. 27th. 1918.

Frank S Stone

Notary Public Baldwin County. Alabama.



*Zella Mc Cormack  
Gibson*

vs.

*Arthur Gibson*

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, .....

*answer of defendant. Testimony  
of Zella Mc Cormack Gibson, the  
complainant and Mrs L. B.  
Mc Cormack.*

and in behalf of Defendant upon.....

*J. W. Peterson*

Register

500  
No. 148.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Zella Mc Cormack

Gibson,

vs.

Arthur Gibson.

NOTE OF TESTIMONY.

Filed in Open Court this

20<sup>th</sup>

day of

March

1919.

J. R. Richardson

Register

J. R.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. .... Term, 191.....

*Zeeva Mc Cormack Gibson* Complainant.....

vs.

*Arthur Gibson* Defendant.....

To *Hon W. P. 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 *Stam & Stam*.....

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.

*Stam & Stam*  
Solicitor for Complainant.

600

No. 148

Page .....

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

East Lake

Zella Mc Cormack  
Gibson

vs.

Arthur Gibson

REQUEST FOR DECREE IN  
VACATION.

Filed March 20 1919

D. W. Robinson

Register

Recorded in ..... Record

Vol. .... Page .....

Register

RZ

Zella Mc Cormack Gibson

THE STATE OF ALABAMA,  
Baldwin COUNTY.

vs.

Arthur Gibson,

IN EQUITY.

CIRCUIT COURT OF  
Baldwin COUNTY.

Register

In this cause it being made to appear to the ~~Judge~~ of this Court, in Term time, by the affidavit.....of

Zella Mc Cormack Gison

~~Plaintiff~~ of Complainant,

that the Defendant Arthur Gibson

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

Arthur Gibson,

to answer or demur to the Bill of Complaint in this cause by the 8th, day of Febuary 19

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

This 7th day of January, 19

*J. W. Robinson*  
Register, ~~Judge~~ Judge of the Circuit Court of  
Baldwin County, Ala.

37

No. ....

vs.

ORDER OF PUBLICATION.

CIRCUIT COURT,

County.

Filed in office this 7 day of

January 19 19

J. M. Wilson

Clerk.

JR

ZELLA McCORMACK GIBSON,  
Complainant.

-vs-

ARTHUR GIBSON,  
Defendant.

IN THE CIRCUIT COURT-EQUITY  
STATE OF ALABAMA  
BALDWIN COUNTY

Comes the Defendant, Arthur Gibson and files this his answer to the bill of complaint in the above case filed.

The defendant denies each and every paragraph of the bill of complaint and demands strict proof thereof.

*Arthur Gibson*  
\_\_\_\_\_  
Defendant.

Further notice of the taking of testimony or submission is hereby waived by me. This the \_\_\_ day of February 24, 1919.

*Arthur Gibson*  
\_\_\_\_\_  
Defendant.



-----X  
 ZELLA MCCORMACK GIBSON, )  
                   a Complainant. )  
                                   ) )  
                   - vs -          ) )  
                                   ) )  
 ARTHUR GIBSON,                  ) )  
                                   ) )  
                                   ) )  
                                   ) )  
 Defendant.                      ) )  
                                   ) )  
 -----X

IN THE CIRCUIT COURT-EQUITY SIDE  
 STATE OF ALABAMA  
 BALDWIN COUNTY  
 No. \_\_\_\_\_

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

Zella McCormack Gibson exhibits this, her original Bill of Complaint for divorce from Arthur Gibson and respectfully represents and shows unto your Honor:-

-FIRST-

That she is a "bona fide" resident of the State of Alabama, County of Baldwin, is over the age of twenty-one years and of sound mind. That the defendant, Arthur Gibson, is over the age of twenty-one years; that he is a non-resident of the State of Alabama and when last heard from resided in Detroit, Michigan, his more particular address is unknown to Complainant and cannot be ascertained after diligent inquiry on her part.

-SECOND-

That she and the said Arthur Gibson were married at <sup>CENTURY</sup> Pensacola, Florida on to-wit; May 12th, 1917, and lived to-gether as man and wife until t-wit; May 29th, 1917.

-THIRD-

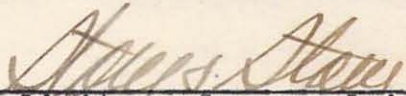
That while living to-gether as man and wife the said Arthur Gibson acted toward her in a cruel and inhuman manner; at various times he cursed her and threatened her life and attempted to strike her with a revolver and that his conduct was such that your Complainant had reasonable apprehension for her life and health and was compelled to leave him.

## PRAYER FOR PROCESS

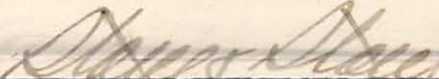
THE PREMISES CONSIDERED, Oratrix prays that process be issued out of this Honorable Court requiring the said Athur Gibson to appear answer, plead or demur to this Original Bill of Complaint within the time required by law, under the pains and penalties of this Court.

## 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 bewteen Complainant and the said Arthur Gibson be forever dissolved and that Oratrix be again permitted to contract marriage; And as in duty bound, she will ever pray, etc., etc.,

  
Solicitors for Complainant

FOOT NOTE:-The defendant, Arthur Gibson, 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.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

No. 148. CIRCUIT COURT, IN EQUITY.

Zella Mc Cormack Gibson Complainant

vs.

Arthur Gibson, Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, ~~decree pro confesso~~  
~~Answer~~, and testimony of Zella Mc Cormack Gibson and Mrs. L.B. Mc Cormick,  
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 her

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

Zella Mc Cormack Gibson, is forever divorced from the said

Arthur Gibson, for and on account of

Cruel and inhuman treatment,

as alleged in said Bill of Complaint;

It is further ordered, that the said Zella Mc Cormack Gibson  
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 Zella Mc Cormack Gibson,  
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 Arthur Gibson,

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

This 24th day of March

1919

*W. E. Goulette*

Judge of the Circuit Court of Baldwin County.

No. 148,

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.  
BALDWIN COUNTY, ALA.

Zella Mc Cormack Gibson,

vs.

Arthur Gibson.

DECREE OF DIVORCE.

Filed in office this 25<sup>th</sup>

day of March 1919

J. W. Rimmer

Register.

E. O. M.

Recorded on minutes

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Zella Gibson. Complainant

vs.

Arthur Gibson. Defendant

Oral examination before the Register of the following witnesses: for the complainant.

Zella Gibson, the complainant, and Mrs. L. B. McCormack.

who reside in Alabama, said examination being conducted in Bay Minette Alabama,

on this the 20th day of March, 1919, and there being present

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

My name is Zella Gibson. I am the complainant in a certain suit in the Circuit Court of Baldwin County, Alabama, wherein Arthur Gibson is the defendant. I am the wife of Arthur Gibson. I am the complainant in the above named cause and am suing him for a divorce in said suit.

I am a resident of the State of Alabama. I live near Bay Minette, Baldwin County, Alabama.

I was married to the said Arthur Gibson on the 12th day of May, 1917. I moved to his home near Brewton, Escambia County, Alabama. I only lived with him for three weeks about. From the start he treated me in a cruel and inhuman manner. He cursed me continuously; threatened to strike me with a revolver. His conduct was domineering and cruel all of the time. For fear that he would do me bodily injury I wired to my mother to come and get me. Before my mother got there I had been compelled to go elsewhere. When she came I went back home

with her. I have never returned to live with him since that time.

He told me that he did not want me to stay with him any longer. Threatened to kill me, drove me away in the night and then I came on home after receiving my fare from my mother.

While I was with him he never bought me any food or clothing. I even had to sell some of my clothes in order to get some food for myself.

Zella Gibson.

TESTIMONY OF MRS. L. B. McCORMACK.

I live in Baldwin County, Alabama, near Bay Minette. I am the mother of Zella McCormack Gibson who is the complainant in a certain suit in the Circuit Court of Baldwin County wherein Arthur Gibson, her husband, is the defendant.

My daughter, Zella McCormack Gibson and Arthur Gibson were married in Century, Florida, about May 12th, 1917.

She moved to Brewton, Escambia County, Alabama with Arthur Gibson. They only lived together about three weeks when she wired me to come and get her. I went up there at once and there found that she had been badly mistreated and been driven away from home and was at the house of a Mr. West.

She had bruises all over her body where Arthur Gibson had beaten her. ~~xxxxxx after xxxxxx left his house xxxxxx attempted to get the id of the~~  
~~xx~~  
~~xx~~ She was in a serious condition and I had to bring her back home with me.

She has never lived with him since that time. He, during the time they were together threatened to strike her with a revolver and threatened her life and cursed her.

I know of no good reason that he had to act as he did.

Mr. L. B. McCormack

I, D. W. Reardon, as Register

hereby certify that the foregoing deposition..... on oral examination them taken down by me in writing in the words of the witness u 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 u, or had proof made before me of the identity of said witness u; 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 20th day of March, 1919  
D. W. Reardon (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..... \$.....
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- ..... days' attendance at \$1.50 per day..... \$.....
- ..... days' attendance at \$1.50 per day..... \$.....
- ..... days' attendance at \$1.50 per day..... \$.....

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:**

**Zella McCormack Gibson**

vs. Complainant,

**Arthur Gibson**

Defendant.

**Deposition Taken Before Register on Oral Examination.**

Deposition of **Mrs. I. B. McCormack Zella McCormack Gibson**

for **Complainant**

Filed **20** day of **March**, 19 **19**

Published by order of the Court,

day of \_\_\_\_\_, 19 \_\_\_\_\_

Register.