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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 O.R. Jones,

of Baldwin 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

Matilda Jones,

against said

O.R. Jones,

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 20th day of March,

1919.

T. W. Richerson

Register.

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

Original

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,
IN EQUITY.

No.....

SUMMONS.

Matilda Jones,

vs.

O. R. Jones,

Page and Moorer,

Solicitor for Complainant.

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

2nd

THE STATE OF ALABAMA,
BALDWIN COUNTY.

Received in office this *20th*,

day of *March*, 191*9*.

Sheriff.

Executed this *29* day of

March 191*9*

by leaving a copy of the within Summons with

O. R. Jones

Defendant

O. B. Richerson

Sheriff

By

J. S. Hayes

Deputy Sheriff.

FR

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Matilda R-Jones Complainant

vs.

O.R. Jones Defendant

Oral examination before the Register of the following witnesses:

Matilda Jones,

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, on this the 23d day of April, and there being present

H.D. Moorner,

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

My name is Matilda Jones, I am a citizen of Baldwin County and over the age of twenty one years . O.R.Jones is a resident of Baldwin County and over the age of twenty -one years , both of us reside near Bay Minette, Alabama, I have no income whatever I am 44 years of age, O.R.Jones is about 60 years of age, and has a great deal of property, which is very valuable as farming land and produces a large income each year, that he is also the owner of a great deal of personal property , all the said property being in Baldwin County, Alabama, .

The said O.R.Jones has constantly mistreated me, by making threats to shoot me, he at one time hit me across the face, from the conduct of the said O.R.Jones, I was afraid he would endanger my health, and I was also afraid that he would take my life. he constantly cursed and abused me, and for the last several months, has been very touchous, and erratic, .

Most of the property owned by O.R. Jones, has been acquired since our marriage, and I have worked my entire life, helping the said O.R. Jones, acquire this property. O.R. Jones repeatedly ordered me off the place and he is very anxious to get me to leave the premises so that he ^{may} make his minor children support him, O.R. Jones, will not put sufficient food in the home to care for his family, Nor does he provide the necessary clothes for me and our children, O.R. Jones is financially able to care for his family, without me having to milk and sell butter and eggs to support myself and children

The names of the children under 21 years of age are as follows:
Samford Jones age 15. Sam Jones age 14. Hicks Jones about 12 years of age . Doris Jones about 10 years of age.

Matilda Jones

I, T. W. Richerson, as Register,

hereby certify that the foregoing deposition.... on oral examination was taken down by me in writing in the words of the witness.... and read over to her and she 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....., or had proof made before me of the identity of said witness.....; 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 23rd, day of April, 19 19.

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,

_____ COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Mattie Jones

vs. Complainant,

A. R. Jones

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of _____

for _____

Filed _____ day of _____, 19____

Published by order of the Court, _____

day of _____, 19____

Register.

Matilda Jones,

vs.

O.R. Jones,

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 testimony of Matilda Jones,

and in behalf of Defendant upon.....

J. W. Rice

Register

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No. 160.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Matilda Jones,

vs.

O. R. Jones,

NOTE OF TESTIMONY.

Filed in Open Court this 26th,

day of April 1919.

T. H. Richmond

Register

FR

TO HONORABLE A. E. GAMBLE, JUDGE OF THE CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.-----In Equity.

Your Oratrix, Matilda Jones, respectfully represents and shows unto your Honor as follows:

1. That she is a bona fide resident citizen of the County of Baldwin and State of Alabama, and over the age of twenty-one years.

That O. R. Jones is a resident of the County of Baldwin and State of Alabama, and is over the age of twenty-one years.

That both Matilda Jones and O. R. Jones both reside near Bay Minette, Alabama.

2. That your Oratrix and the said O. R. Jones were married some or about 25 years ago and is the mother and father of eight children, four of which are under the age of twenty-one years and four over the age of twenty-one years of age. That the names and ages of the children under the age of twenty-one years are as follows: Samford Jones, age 15; Sam Jones, age about 14; Hix Jones, age about 12 and Dories Jones, age about 10.

3. That your Oratrix is a woman about forty-four years old and owns but very little property and has no income whatever to support herself and children; That O. R. Jones is a man about 60 years of age and has a great deal of property which is very valuable as farming land and produces a great deal of income each year; that he also is the owner of considerable personal property, and that all of said property is in the County of Baldwin and State of Alabama.

4. That the said O. R. Jones is constantly mistreating your Oratrix and is very inhuman and cruel towards her, and that from the conduct ~~and~~ of the said O. R. Jones, Your Oratrix has reasonable apprehension of such violence as to endanger her life or health. That the said O. R. Jones has constantly cursed and abused your Oratrix and treated her in any other

way than as his wife.

5. That the most of the property owned by the said O. R. Jones has been acquired since the marriage of your Oratrix and the said O. R. Jones, and that your Oratrix has worked her entire life since marriage to the said O. R. Jones and have been a great deal of help to the said O. R. Jones in acquiring the property owned and controlled by him; and that the said O. R. Jones has repeatedly ordered your Oratrix off the place and at one time threatening to get a gun if your Oratrix did not leave the premises. That the said O. R. Jones is very anxious to get your Oratrix to leave the premises so that he may make his minor children support him; that the said O. R. Jones will not put sufficient food in the home to care for his family; that he does not provide the necessary clothes for your Oratrix which necessarily forces your Oratrix to buy food and clothing for herself and children with money made by her milking and selling butter and by selling eggs; that the said O. R. Jones is financially able to care for his family without your Oratrix having to resort to such methods to support herself and family.

PRAYER FOR PROCESS.

The premises considered, Complainant prays that the said O. R. Jones be made party respondent to this bill of complaint by the usual process of this Honorable Court, and that all orders and decrees may issue as necessary to obtain the relief prayed; that Your Honor will order a reference held to determine the amount of temporary alimony and attorneys fee for carrying on this litigation; that the said O. R. Jones 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. That the writ of restraining the said O. R. Jones from proceeding in this matter until decree on reference is complied with, injunction issue
PRAYER FOR RELIEF.

That Your Honor will grant unto Complainant temporary alimony sufficient to care for herself and her four minor children while this litigation is pending, and that Your Honor will grant unto her a reasonable attorneys fee for carrying on this litigation. That upon the final hearing of this cause Your Honor will grant unto your Oratrix the custody and control of

her four children named in this Bill of Complaint and a reasonable amount of permanent alimony so care for your Oratrix and her four children suitable to their condition and station in life and to the estate of the said O. R. Jones. That your Honor will grant unto your Oratrix a divorce from bed and board of the said O. R. Jones.

That if your Oratrix is mistaken in the relief prayed then Your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled.

Matilda Jones
Petitioner.

Page & Moore

Solicitors for Complaint.

State of Alabama,
Baldwin County.

Before me, Henry D. Moorer, a Notary Public in and for said County and State, personally appeared Matilda Jones, who, being by me first duly sworn doth depose and say:

That the allegations contained in the foregoing Bill of Complaint are true.

Dated at Gay Minette, Alabama this 20th day of March, 1919.

Matilda Jones

Sworn and subscribed to before me this 20th day of March, 1919.

Henry D. Moorer
Notary Public.

Matilda Jones, Complainant.)	
	:	IN THE CIRCUIT COURT OF
vs.)	
	:	BALDWIN COUNTY, ALABAMA,
O. R. Jones, Defendant.)	
	:	IN EQUITY.

Now Comes the Defendant, and by leave of the court first had and obtained, and amends her original bill in this cause by amending the prayer for relief and making same read as follows:

PRAYER FOR RELIEF;

That Your Honor will grant unto Complainant temporary alimony sufficient to care for herself and her four minor children while this litigation is pending, and that your Honor will grant unto her a reasonable attorneys fee for carrying on this litigation. That upon the final hearing of this case Your Honor will grant unto your Oratrix the custody and control of her four children named in this bill of Complaint and a reasonable amount of permanent alimony to care for your Oratrix and her four children suitable to their condition and station in life and to the said O. R. Jones. That your Honor will grant unto Oratrix an absolute divorce from the said O. R. Jones.

That if your Oratrix is mistaken in the relief prayed then Your Honor will grant unto her such other, further, difference and general relief as she may in justice and Equity be entitled.

Petitioner.

Ray & Thomas

Solicitors for Complaint.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

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CIRCUIT COURT, IN EQUITY.

No. 160. Spring Term, 191..9..

Matilda Jones,

Complainant.....

vs.

O.R. Jones,

Defendant.....

To T.W. Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taking 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 H.D. Moorer, of the firm of Page and Moorer,

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.


Solicitor for Complainant.

O. R. Jones,)
))
COMPLAINANT.))
))
vs.))
))
MATALDO JONES.))
))
DEFENDANT.))

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

Comes O. R. Jones, named as defendant in this cause and for answer denies each and every allegation of the Bill of Complaint and demands strict proof of same. He waives service by the Sheriff of Subpoena on said Bill, notice of the filing of interrogatories, or any proceeding to take testimony or 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.

Date of this 11 day of April, 1919.

Staves Stave
Solicitors for O. R.
Jones.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 160. CIRCUIT COURT, IN EQUITY.

Matilda Jones Complainant
vs.
O. R. Jones Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, ~~decrees 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 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

Matilda Jones is forever divorced from the said

O. R. Jones for and on account of

Cruelty

as alleged in said Bill of Complaint;

It is further ordered, that the said Matilda Jones and O. R. Jones 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 Matilda Jones and O. R. Jones 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 O. R. Jones

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

This 26th day of April

1919
W. G. Gable
Judge of the Circuit Court of Baldwin County.

No. 160.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Matilda Jones,

vs.

O.R. Jones,

DECREE OF DIVORCE.

Filed in office this 1st,

day of May, 1919.

J. W. Richardson

Register.

E. O. M.

*Recorded on Minutes
Page 44.*