

171

MINNIE S. McGUIRE,	:	No. 171. IN EQUITY.
COMPLAINANT.	:	
	:	IN THE CIRCUIT COURT OF
VS	:	
	:	BALDWIN COUNTY, ALABAMA.
ROBERT D. McGUIRE,	:	
RESPONDENT..	:	

This cause, coming on to be heard at this term was submitted on the bill of Complainant, answer, testimony of complainant and agreement of counsel, all 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 FURTHER ORDERED, ADJUDGED and DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and Respondent be and the same are hereby dissolved and the said MINNIE S. McGUIRE is forever divorced from the said ROBERT D. McGUIRE for and on account of the desertion of the said ROBERT D. McGUIRE for more than two years prior to the filing of the bill as alleged in the bill of Complaint.

IT IS FURTHER ORDERED that either party may again contract marriage after sixty days from this date upon the payment of the costs of court in this cause.

It is further ordered that this case be held open for such future orders as to the custody of EVELYNE McGUIRE, the child of the marriage, as shall from time to time appear to the court to be for the best interest of said minor child.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that neither party shall again marry except to each other until sixty days after this date and that if an appeal is taken within sixty days, he nor she shall not marry again except to the other party to this cause during the pendency of said appeal.

IT IS FURTHER ORDERED that Complainant pay the costs herein taxed, for which execution may issue.

Done in Term Time at Bay Minette, Alabama, this the 22nd
day of May, Nineteen Hundred and Nineteen.

A. E. Gamble
Judge of Circuit Court
of Baldwin County, Alabama.

NO. 171,

IN EQUITY.

CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA.

MINNIS S. McGUIRE,
COMPLAINANT.

VS

ROBERT D. McGUIRE,
RESPONDENT.

DECREE OF DIVORCE.

Filed 5/22/19.
T. W. Richmond
Register.

MINNIE S. MCGUIRE:
VS
ROBERT D. MCGUIRE:

NO IN EQUITY
IN THE CIRCUIT COURT
BALDWIN COUNTY, ALABAMA.

INTERROGATORIES TO BE PROPOUNDED TO
MRS. MINNIE S. MCGUIRE. WITNESS FOR COMPLAINANT.

INTERROGATORY ONE. Are you the complainant in this cause? If so, how long have you lived in Alabama? Were you a resident of the State of Alabama for three years or more prior to April 14, 1919. Are you now living in Fairhope, and if not, what has been the reason for your absence for the past few months?

INTY. TWO. When and where, were you married to the defendant in this cause? Were you both over the age of twenty-one years on January 1, 1919? Where did you live together after your marriage and up to what date?

INTY. THREE. If you state that you and Mr. McGuire are not living together, please state when this separation occurred. If you say the defendant abandoned you, state whether or not you have at any time resumed marriage relations? Where is he living now?

INTY. FOUR. Was there a child of this marriage, if so state her name and age and where she is at the present time?

Richard Frazer & Buler.
Solicitors for Complainant.

Complainant suggests the name of *Elmer R. Lundberg* who with the witness resides in Portland, Oregon, as a suitable commissioner to take testimony in this cause.

Richard Frazer & Buler.
Solicitors for Complainant.

Filed 4/30/1919
P. W. Richardson
Register

MINNIE S. McGUIRE : NO. IN EQUITY.
VS :
ROBERT D. McGUIRE : IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

The deposition of Mrs. Minnie S. McGuire, witness examined on behalf of the Complainant in the above entitled cause.

The said witness appeared at the time and place hereinafter named and after having been first duly sworn to speak the truth, the whole truth and nothing but the truth, did testify and in answer to the interrogatories, say as follows:

ANSWER TO INTERROGATORY ONE. I am the complainant in this cause I have lived in Alabama all my life and in the city of Mobile since January 20, 1906. I am still a resident of Alabama, though from January 14, 1918 up to the time this bill was filed I was employed as a civilian employee in a Government Department in Washington, D. C. From February 1916 to January 1918 I lived in Fairhope, Alabama.

ANSWER TO INTERROGATORY TWO. I was married to Robert D. McGuire on October 26, 1904 at Anniston, Alabama. As said above we lived together at Anniston and Mobile up to February 12, 1916. He and I were both over the age of twenty-one years when this bill was filed.

ANSWER TO INTERROGATORY THREE. Mr. McGuire left me in February, 1916 at Mobile. Shortly after this, on May 31, I removed to Fairhope and lived separate and apart from him ever since. He has never come back since he left me and we have never since that time resumed marriage relations. He has since gone to Chattanooga, Tennessee, where he now resides.

ANSWER TO INTERROGATORY FOUR. There is one child of our marriage, a daughter, Evelyne, who was born September 20, 1906. She is now in school in Portland, Oregon, where she lives with my brother who is very fond of her and who is largely paying the expenses of her education.

Minnie S. McGuire

C E R T I F I C A T E

I, *Elihu R. Lundberg* the commissioner named in the foregoing commission which issued out of the Circuit Court of Baldwin County, Ala., do hereby certify that in a cause pending in said court, wherein Minnie S. McGuire is Complainant and Robert D. McGuire Defendant, under and by virtue of the power conferred upon me by said commission. I caused the said Minnie S. McGuire, who is known to me and who is known to me to be the identical witness named in the commission to come before me at *625 Yeon Building,* Portland, Ore. on the *8th* day of *May*, 1919, where said witness after after having been first duly sworn by me as stated, was examined upon the attached interrogatories and testified in response thereto as is hereinabove set out; that her testimony was by me reduced to writing as given by her and as near as might be in the identical language of the witness and after having been so reduced to writing was read over to said witness, who assented to and signed the same in my presence.

I further certify that I am not of council or kin of either of the parties to the cause and am not in anywise interested in the result thereof.

Witness my hand this the *8th* day of May, 1919.



Elihu R. Lundberg

Commissioner.

NOTARY PUBLIC FOR OREGON

MY COMMISSION EXPIRES DEC. 3, 1920

The State of Alabama,

CIRCUIT COURT.

Baldwin COUNTY.

Equity, Division.

To X Elmer R. Lundberg

or such of you as may act herein, of Multnomah County, State of Oregon, Greeting:

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

Minnie S Mc Guire,

material witness in a suit now pending in our Circuit Court of Baldwin County, wherein

Minnie S Mc Guire, is the

Plaintiff, and

Robert D Mc Guire,

is the

Defendant, and we hereby authorize and empower you to call and cause to come before you Minnie S Mc Guire,

the said witness and her deposition on the Holy Evangelists to take, as well for the plff, as for the touching her 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 30th, day of April, 1919.

Witness' Fees, - - - \$

Commissioners' Fees, \$

M. Dickerson Clerk.

No.
The State of Alabama,
County.

CIRCUIT COURT,
Equity **DIVISION**

Minnie S. Mc Guire
vs. Plaintiff,

Robert D. Mc Guire,
Defendant.

COMMISSION TO TAKE DEPOSITION ON SET INTERROGATORIES.

Issued this 30th day of
April 1919
J. W. Robinson Clerk.

WITNESSES:
Minnie S. Mc Guire,

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, deposeth 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:

CD v. EF	To <u>J. W. Robinson</u> Esq., CLERK OF THE CIRCUIT COURT,
DEPOSITION OF	<u>Bay Minette</u>
A B	<u>Baldwin</u> County, Ala.

The package may be sent by mail or private conveyance.

MINNIE S. McGUIRE,
COMPLAINANT.

VS

ROBERT D. McGUIRE,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
NO. IN EQUITY.

The depositions of M.A. Bowen and Edward J. Roberts, witnesses examined on behalf of the Complainant in the above entitled cause.

The said witnesses appeared at the time and place hereinafter named and after having been first duly sworn to speak the truth, the whole truth and nothing but the truth, did testify and says as follows:

M. A. BOWEN.

I have been personally acquainted with Mrs. Minnie S. McGuire for four years past. She owned a summer home in Fairhope and in which town I live. I am manager of the Steamer Apollo and first met her going backwards and forwards from her home. Since the spring of 1916 she has been living at Fairhope entirely and her husband has not been living with her. They have been separated for more than two years, but just how much longer I do not know as I do not keep special tract of dates and only remember that it was in the spring of 1916 that she moved to Fairhope and lived separate and apart from her husband. To the best of my knowledge and belief, they have not returned to live with each other since that time and I am informed that he has been away from Mobile for perhaps two years, as I understand at Chattanooga. I know nothing of the cause of their separation but know only that it is a fact and that they have been living separate and apart. From my position as manager of the boat, if he came to Fairhope I would know it and to the best of my recollection he has not been over there in the past three years. I do not think I have seen him for two and one-half years. Mrs.

McGuire and her little daughter lived quietly in Fairhope up to the time she went to Washington to work for the Government in one of the Departments. During two years of this time I was Mayor of the town and as such kept in touch with all of the people living there and in addition, as Manager of the Apollo I was bound to know who came and went.

W. A. Bowen

EDWARD J. ROBERTS.

My name is Edward J. Roberts. I am Master of the Steamer Apollo and have been for a number of years past. I have known Mrs. Minnie S. McGuire for about four years, dated from the time she first built her house in Fairhope. At first she used to come over for short stays, but in the spring of 1916 she and her little daughter moved over and lived there continuously up to January 1918, when she went to Washington in response to the Government's call in order to work in one of the Government offices, and I understand is so employed. She and her daughter have lived alone and separate from her husband, and to the best of my knowledge and belief, he has never come to Fairhope in the past three years, nor have they lived together during that time. I know this because I am Master of the Steamer Apollo, the only boat running direct to Fairhope, and it is my business to see every one that comes and goes. I have not seen Mr. McGuire in about two years and a half and understand that he has left Alabama and is living in Chattanooga, Tennessee.

Edward J. Roberts

C E R T I F I C A T E

I, MARIE HOLMES, the commissioner named in the foregoing commission which issued out of the Circuit Court of Baldwin County, do hereby certify that in a certain cause pending in said court, wherein Minnie S. McGuire is Complainant and Robert D. McGuire Defendant, under and by virtue of the power conferred upon me by said commission, I caused the said M. A. Bowen and Edward J. Roberts, who are known to me and who are known to me to be the identical witnesses named in the commission to come before me at the times and places hereinafter named, that is to say I caused the said M. A. Bowen to come before me at No. 1010 Van Antwerp Building, at Mobile, Alabama on the Fifth day of May, Nineteen Hundred and Nineteen; and the said Edward J. Roberts at No. 1010 Van Antwerp Building, at Mobile, Alabama, on the Ninth day of May, Nineteen Hundred and Nineteen; that said witnesses were first duly sworn by me as stated; that they were examined by counsel for complainant and testified in response thereto as is hereinabove set out; that their testimony was by me reduced to writing as given by them and as near as might be in the identical language of the witnesses; and after having been so reduced to writing was read over to said witnesses who assented to and signed the same in my presence and in the presence of the solicitor for Complainant.

I further certify that I am not of counsel or kin to either of the parties of the cause or in anywise interested in the result thereof.

Witness my hand this the 9th day of May, 1919.

Marie Holmes.
Commissioner.

State of Alabama,
 Baldwin County. :
 Minnie S Mc Guire : Circuit Court of said County,
 Complainant. : In Chancery .
 vs :
 Robert D Mc Guire, :
 Respondent. :

To Miss Marie Holmes, Greetings:

KNOW YE , that we, in confidence of your prudence and fidelity, have appointed you, and by these presents , do give you full power and authority to take, upon oral examination , the depositions of Mrs. C.A.Lambert, Chickashaw, Ala, Mrs. Mary Ehler, Fairhope, Ala, Mr. M.A.Bowen, Fairhope, Ala, Mr. Edward Roberts, Fairhope, Ala, Mr. W.P.Minnich, Fairhope, Ala, as witnesses for the complainant in the above styled cause, and therefore, we command you that at such time and place, or times and places , as you may appoint, of which you will give notice to complainants attorneys Messers Rickarby Frazier and Beebe, you do cause the said witnesses to come before you and then and there examine them on oath, on the interrogatories which may be then and there propounded to them by said parties . And that you do take such examination and reduce the same into writing and return the same annexed to this writ, closed up under under your seal into ~~our~~ said Circuit Court , with all convenient speed, that the same may be read in evidence on the trial of the cause aforesaid.

Witness this 28th, day of April, 1919.

T. W. Rickarby

 Register.

MINNIE S. McGUIRE,
COMPLAINANT.

VS

ROBERT D. McGUIRE,
RESPONDENT.

DEPOSITIONS OF M.A. BOWEN
and EDWARD J. ROBERTS,
WITNESSES FOR COMPLAINANT.

COMMISSIONER'S FEE \$5.00
PAID BY COMPLAINANT.

MINNIE S. McGUIRE,	:	No. 171. IN EQUITY.
COMPLAINANT.	:	
	:	IN THE CIRCUIT COURT OF
VS	:	
	:	BALDWIN COUNTY, ALABAMA.
ROBERT D. McGUIRE,	:	
RESPONDENT..	:	

This cause, coming on to be heard at this term was submitted on the bill of Complainant, answer, testimony of complainant and agreement of counsel, all 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 FURTHER ORDERED, ADJUDGED and DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and Respondent be and the same are hereby dissolved and the said MINNIE S. McGUIRE is forever divorced from the said ROBERT D. McGUIRE for and on account of the desertion of the said ROBERT D. McGUIRE for more than two years prior to the filing of the bill as alleged in the bill of Complaint.

IT IS FURTHER ORDERED that either party may again contract marriage after sixty days from this date upon the payment of the costs of court in this cause.

It is further ordered that this case be held open for such future orders as to the custody of EVELYNE McGUIRE, the child of the marriage, as shall from time to time appear to the court to be for the best interest of said minor child.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that neither party shall again marry except to each other until sixty days after this date and that if an appeal is taken within sixty days, he nor she shall not marry again except to the other party to this cause during the pendency of said appeal.

IT IS FURTHER ORDERED that Complainant pay the costs herein taxed, for which execution may issue.

Done in Term Time at Bay Minette, Alabama, this the
day of May, Nineteen Hundred and Nineteen.

Judge of Circuit Court
of Baldwin County, Alabama.

I hereby certify that the foregoing is a true and exact copy of the Decree of Divorce rendered in the above entitled cause pending in the Circuit Court of Baldwin County, Alabama, as same appears upon the Minutes of this Court.

WITNESS my hand and the seal of said Court this
day of May, Nineteen Hundred and Nineteen.

Register of Circuit Court,
Baldwin County, Alabama.

MINNIE S. McGUIRE,	:	No. 171. IN EQUITY.
COMPLAINANT.	:	
	:	IN THE CIRCUIT COURT OF
VS	:	
	:	BALDWIN COUNTY, ALABAMA.
ROBERT D. McGUIRE,	:	
RESPONDENT..	:	

This cause, coming on to be heard at this term was submitted on the bill of Complainant, answer, testimony of complainant and agreement of counsel, all 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 FURTHER ORDERED, ADJUDGED and DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and Respondent be and the same are hereby dissolved and the said MINNIE S. McGUIRE is forever divorced from the said ROBERT D. McGUIRE for and on account of the desertion of the said ROBERT D. McGUIRE for more than two years prior to the filing of the bill as alleged in the bill of Complaint.

IT IS FURTHER ORDERED that either party may again contract marriage after sixty days from this date upon the payment of the costs of court in this cause.

It is further ordered that this case be held open for such future orders as to the custody of EVELYNE McGUIRE, the child of the marriage, as shall from time to time appear to the court to be for the best interest of said minor child.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that neither party shall again marry except to each other until sixty days after this date and that if an appeal is taken within sixty days, he nor she shall not marry again except to the other party to this cause during the pendency of said appeal.

IT IS FURTHER ORDERED that Complainant pay the costs herein taxed, for which execution may issue.

Done in Term Time at Bay Minette, Alabama, this the
day of May, Nineteen Hundred and Nineteen.

Judge of Circuit Court
of Baldwin County, Alabama.

I hereby certify that the foregoing is a true and exact copy of the Decree of Divorce rendered in the above entitled cause pending in the Circuit Court of Baldwin County, Alabama, as same appears upon the Minutes of this Court.

WITNESS my hand and the seal of said Court this
day of May, Nineteen Hundred and Nineteen.

Register of Circuit Court,
Baldwin County, Alabama.

TO THE HONORABLE ARTHUR E. GAMBLE, JUDGE OF THE
CIRCUIT COURT OF BALDWIN COUNTY, SITTING IN EQUITY.

Your Oratrix, MINNIE S. MCGUIRE, by this her bill
of complaint presented against ROBERT D. MCGUIRE respectfully
shows:

FIRST: That she and the defendant above named are
over the age of twenty-one years; that she is a resident of
Fairhope, Baldwin County, Alabama, though temporarily em-
ployed in Government work in the city of Washington, D. C.,
and has been a resident of the State of Alabama for more than
three years prior to the filing of this bill; that the De-
fendant is now a resident of the city of Chattanooga, Tennessee.

SECOND: That Oratrix and the Defendant above named
were legally married at Anniston, Alabama, on October 26th,
1904, and lived there together as man and wife until January
6, 1906 when they removed to Mobile, and have lived since
either in Mobile or Fairhope, except as otherwise stated in
this bill.

THIRD: That on or about the 12th day of February,
1916 Defendant, without lawful cause, abandoned Oratrix and
subsequently removed to Chattanooga, Tennessee, while Oratrix
has taken up her abode at Fairhope, Alabama, where her legal
residence still continues; that during said period she has
not resumed marriage relations with Defendant, a period of
now more than two years.

FOURTH: That there was born of said marriage a
daughter, Evelyne McGuire; who was born on September 20, 1906,
and who lives with Oratrix, though she is at present at
boarding school.

PREMISES considered Oratrix prays that the Defend-

and Robert D. McGuire by proper legal process be made a party defendant to this bill and required to plead, answer or demur to the same within the time required by law.

Oratrix further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said Robert D. McGuire, granting her permission to remarry, should she so desire, and permitting her the custody of Evelyne McGuire, the child of said marriage, under such conditions as this court may from time to time decree, having in mind the rights of both parents and the best interests of said minor, and that Oratrix may have such other, further and different relief as to which she may be entitled in equity and which your Honor deems meet. Oratrix, as in duty bound, will ever pray, et cetera.

Richard E. Frazee & Buba
Solicitors for Complainant.

The defendant is required to answer every paragraph of the foregoing bill, but oath to said answer is hereby waived.

Richard E. Frazee & Buba
Solicitors for Complainant.

MINNIE S. McGUIRE)	NO.
VS)	IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ROBERT D. McGUIRE)	ALABAMA, SETTING IN EQUITY.

ANSWER OF ROBERT D. McGUIRE, RESPONDENT.

Now comes Robert D. McGuire, respondent in the above styled bill and for answer says:

- 1 -

He admits that he and the oratrix are over 21 years of age, he admits that oratrix is a resident of Fairhope, Baldwin County, Alabama, and that she has been temporarily employed in the city of Washington, D. C., and that oratrix has been a resident of the state of Alabama for more than three years prior to the filing of her bill. Respondent admits that he is now a resident citizen of the city of Chattanooga, Tennessee.

- 2 -

Respondent admits that he and the oratrix were married at the place and time as alleged in the second paragraph of her bill, and that they lived in the different places all as alleged in the same paragraph.

- 3 -

The respondent denies that he upon the 12th., day of February 1916, or at any other time abandoned oratrix, he denies each and every allegation in the third paragraph of oratrix bill and demands strict proof thereof.

- 4 -

Respondent admits allegations contained in the fourth paragraph of oratrix bill.

All averments and charges of oratrix's bill not herein explained, denied or admitted are hereby denied and strict proof thereof demanded. And now having fully answered respondent prays to be hence dismissed.

Miller & Baeard

Attys., for respondent.
Temple Court Building, Chattanooga, Tenn.

Robert D. McGuire
Respondent.

MINNIE S. MCGUIRE,
COMPLAINANT.

VS

ROBERT D. MCGUIRE,
RESPONDENT.

NO. IN EQUITY.
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Complainant requests the oral examination of the following named witnesses on her behalf, namely:

Mrs. C.A. Lambert, Chickasaw, Alabama;

Mrs. Mary Ehler, Fairhope, Alabama;

Mr. M. A. Bowen, Fairhope, Alabama.

Mr. Edward Roberts, Fairhope, Alabama;

Mr. W. P. Minnich, Fairhope, Alabama.

Miss Marie Holmes, who resides in the city of Mobile, is suggested as a suitable person to be appointed commissioner to take the depositions of said witnesses, on such oral examination.

Rickaby, Frazee & Beebe
Solicitors for Complainant.

We hereby acknowledge receipt of a copy of the foregoing application and consent that commission may issue, waive notice of the time and place of taking testimony and of the right to cross-examine. Respondent further waives the right to introduce testimony in his own behalf and consents that said cause may be submitted for final decree in vacation upon the pleadings and Complainant's testimony.

Dated at Chattanooga, Tennessee this the *22*
day of April, Nineteen Hundred and Nineteen.

Miller & Ballard
Solicitors for Respondent.

No.

IN EQUITY

MINNIE S. MCGUIRE,
COMPLAINANT.

VS

ROBERT D. MCGUIRE,
RESPONDENT.

Application for oral examination and agreement of Counsel.

*Filed 4/28-1919.
T.W. Richmond
Register*

MINNIE S. MCGUIRE,
COMPLAINANT.

VS

ROBERT D. MCGUIRE,
RESPONDENT.

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NO. IN EQUITY.
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

It is hereby agreed between the parties to this cause, acting through their respective solicitors, that in the event that a decree of divorce is rendered in said cause that all claim for alimony or solicitors' fees is waived, and that this case be held open for such future orders as to the custody of Evelyne McGuire, the child of said marriage, as shall from time to time appear to the Court to the best interest of said minor.

IN WITNESS WHEREOF, the parties, by their solicitors, have hereunto set their hands.

Richard Frazar & Beebe
Solicitors for Complainant.

Miller & Ballard
Solicitors for Respondent.

4
No171.

IN EQUITY.

CIRCUIT COURT OF BALDWIN
COUNTY.

MINNIE S. McGUIRE,
Complainant

vs

ROBERT D. McGUIRE,
Respondent.

AGREEMENT AS TO ALIMONY AND
CUSTODY OF CHILD.

Filed in open Court this the
21st day of May 1919.

Register.

Minnie S Mc Guire
Comps

vs.

Robert D Mc Guire
Respondant

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, *the*
agreements as to testimony, depositions of Com-
plainants, In A. Bowen and C. A. Roberts and
agreements as to custody of the child

and in behalf of Defendant upon *Answer*

J. R. McCremon

Register

5-
No. 171

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

MINNIE S. McGUIRE,
Complainant,

vs.

ROBERT D. McGUIRE,
Respondent.

NOTE OF TESTIMONY.

Filed in Open Court this 22nd

day of May 1919

D. McQuinn

Register