WILLIAM WHITE, Complainant. -VS- Jessina White, Defendant.	IN THE CIRCUIT COURT-EQUITY SIDE STATE OF ALABAMA. BALDWIN COUNTY. No.____

TO THE CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY, IN EQUITY, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, IN EQUITY SITTING:-

Comes your complainant, William White and exhibits this his original bill of complaint for divorce against Jessina White on the grounds of Adultery and voluntary desertion and abandonment and shows unto this Honorable Court as follows:-

FIRST:-

That your complainant and the defendant are both over the age of twenty one years; that complainant is a bondafide resident of Baldwin County, State of Alabama, where he has resided continuously for more than three years next immediately preceeding the filing of this bill of complaint; that the defendant, when last heard from, resided in Mobile, Alabama, at 555st. Francis Street.

SECOND:-

That the defendant and the complainant were married on to-wit; May 22d., 1916 and that they lived to-gether as man and wife until, to-wit About the month of July, 1916.

THIRD:-

That on to-wit; during the month of July, 1916, the defendant ~~voluntarily~~deserted and abandoned, without just cause or legal excuse, your complainant and that the said defendant has continued to so desert and abandon him since that time.

FOURTH:-

That since the marriage of the defendant to the complainant the defendant has become a lewd and immoral woman; that she has committed adulterywith one Lump Lucius; that she has committed adultery with other persons whose names are unknown to complainant; that defendant has never be forgiven or taken back since the commission of said acts, nor have said

acts been condoned by the complainant.

PRAYER FOR PROCESS.

The Premises considered complainant prays that your Honor will cause to be issued such order, decrees, subpoenas and summons, directed to the said defendant, as will make her a party respondent to this bill for divorce, requiring her to appear and plead, answer or demur within the time required by law, under the pains and penalties of this honorable court.

PRAYER FOR RELIEF.

That upon a final hearing of this cause that your Honor will render, adjudge and decree that the bonds of matrimoney heretofore existing between the defendant and the complainant be forever dissolved; that your complainant be again permitted to contract the marriage relation if he so desires. And, as in duty bound, he will ever pray, etc., etc.,

Solicitors for Complainant.

FOOT NOTE:-

The defendant, Jessina White, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOURTH" both inclusive, but not under oath, answer under oath being hereby expressly waived.

Solicitors for Complainant.

----------x
WILLIAM WHITE,)
Complainant.)
)
-vs-)
)
Jessina White,)
Defendant.)
)
----------x

IN THE CIRCUIT COURT-EQUITY SIDE
STATE OF ALABAMA.
BALDWIN COUNTY.

No.____

TO THE CIRCUIT COURT-EQUITY SIDE, STATE OF ALABAMA, BALDWIN COUNTY, IN EQUITY, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, IN EQUITY SITTING:-

Comes your complainant, William White and exhibits this his original bill of complaint for divorce against Jessina White on the grounds of Adultery and voluntary desertion and abandonment and shows unto this Honorable Court as follows:-

FIRST:-

That your complainant and the defendant are both over the age of twenty one years; that complainant is a bona fide resident of Baldwin County, State of Alabama, where he has resided continuously for more than three years next immediately preseeding the filing of this bill of complaint; that the defendant, when last heard from, resided in Mobile, Alabama, at 555St. Francis Street.

SECOND:-

That the defendant and the complainant were married on to-wit; ~~May 22d., 1916~~ about 10 years ago and that they lived to-gether as man and wife until, to-wit About the month of July, 1916.

THIRD:-

That on to-wit; during the month of July, 1916, the defendant voluntarily deserted and abandoned, without just cause or legal excuse, your complainant and that the said defendant has continued to so desert and abandon him since that time.

FOURTH:-

That since the marriage of the defendant to the complainant the defendant has become a lewd and immoral woman; that she has committed adulterywith one Lump Lucius; that she has committed adultery with other persons whose names are unknown to complainant; that defendant has never been forgiven or taken back since the commission of said acts, nor have said

acts been condoned by the complainant.

PRAYER FOR PROCESS.

The Premises considered complainant prays that your Honor will cause to be issued such order, decrees, subpoenas and summons, directed to the said defendant, as will make her a party respondent to this bill for divorce, requiring her to appear and plead, answer or demur within the time required by law, under the pains and penalties of this honorable court.

PRAYER FOR RELIEF.

That upon a final hearing of this cause that your Honor will render, adjudge and decree that the bonds of matrimoney heretofore existing between the defendant and the complainant be forever dissolved;,that your complainant be again permitted to contract the marriage relation if he so desires. And, as in duty bound, he will ever pray, etc., etc.,

Solicitors for Complainant.

FOOT NOTE:-

The defendant, Jessina White, is required to answer each and every paragraph of the foregoing bill of complaint from "FIRST" to "FOURTH" both inclusive, but not under oath. answer under oath being hereby expressly waived.

Solicitors for Complainant.

8558 DECREE OF DIVORCE.

Baldwin Times Print.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 243. CIRCUIT COURT, IN EQUITY.

William White Complainant

vs.

Jessina White, Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso testimony of ,William White,J.M.Cauley,Mose Hall and Paulie Hall, 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 William White is forever divorced from the said Jessina White, for and on account of Voluntary abandonment, as alleged in said Bill of Complaint;

It is further ordered, that the said William White, 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 William White 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 Jessina White

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

This 26th day of August, 1920, ~~191~~

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

No. 243.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

William White

vs.

Jessina White,

DECREE OF DIVORCE.

Filed in office this 26th day of Aug 1970

T. W. Richerson
Register.

E. O. M.

Decree Recorded on Minutes

8587 SUMMONS—Original. Baldwin Times Print.

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 Jessina White,

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, wihout oath, to a Bill of Complaint lately exhibited by

William White,

against said

Jessina White,

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 13th, day of July, 1920.

191.

T. W. Richerson
Register.

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

2nd (87) Original Bush

copy

Serve/ on Jessina White 555. St Francis St
Mobile, Ala.

CIRCUIT COURT OF BALDWIN COUNTY,

IN EQUITY.

No. 243.

SUMMONS.

William White,

vs.

Jessina White. 22

Rome & Stone

Solicitor for Complainant.

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

mail Mobile Sheriff

THE STATE OF ALABAMA,

BALDWIN COUNTY.

Received in office this ~~12~~ 14

day of July 1912

Mulcombe Jr

Sheriff.

Executed this 19 day of

July 1912

by leaving a copy of the within Summons with

Jefferson White

Defendant

Mulcombe Jr

Sheriff

By W. Bush

Deputy Sheriff.

8600 Motion for Decree Pro Confesso on Personal Service. 3107 Code.

The State of Alabama, } No. 243 CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY.

William White Complainant

vs.

Jessena White Defendant

Motion is hereby made for a Decree Pro Confesso against Jessena White

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant —; and that said summons was duly served according to law, and that said Defendant — has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 22 day of August 1920 being Monday

[illegible]

Solicitor. for Compl't.

B R

No. 243 Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

William White

Vs.

Jessena White

MOTION FOR DECREE PRO CONFESSO ON PERSONAL SERVICE

Filed August 23 1920

J. W. Rieemon
Register.

Recorded in Record,

Vol. Page

Register.

Baldwin Times Print, Bay Minette.

Granted this Aug 23. 1920
Guy Mondy

Register

THE STATE OF ALABAMA, Baldwin County. } No. 243

CIRCUIT COURT, IN EQUITY.

William White, Complainant

vs.

Jessena White, Defendant

In this cause it appears to the Register that a Summons requiring the Defendant Jessena White to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of said Summons upon Jessena White was served upon her by the Sheriff of Mobile Co. County, Alabama, on the 19 day of July 1920 and the said Defendant having failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of Solicitors for Complainant ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as confessed against the said Jessena White Defendant aforesaid.

This 23 day of August 1920 Every Monday

D. W. Rimmer

Register.

4th R

No. 243 Page.....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Wm Whitt

vs.

Jessing Whitt

DECREE PRO CONFESSO ON PERSONAL SERVICE.

Issued Aug 23 1930

by Monday

P. W. Stevenson Register.

Recorded in.....Record,

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

Register.

DEPOSITION TAKEN BEFORE REGISTER ON ORAL EXAMINATION, Code 3129. (Box 715.) 85605 MARSHALL & BRUCE CO., NASHVILLE

THE STATE OF ALABAMA, Ba ldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

William White Complainant

vs.

Jessina White. Defendant

Oral examination before the Register of the following witnesses:

William White J.M.Cauley.

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, on this the 24th, day of August, 1920, and there being present Hon.N.C.Stone, Atty for Complainant,

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

My name is William White. I am the complainant in the above case. I am about 28 years old. I live at Gateswood in Baldwin County, Alabama, where I have lived all of my life except for about four or five years when I lived in Daphne i n Baldwin County, Alabama.

Jessina White my wife is also over 21 years of age ,when last heard from she lived at 555 St Franciw St Mobile, Alabama,Jessina White and Iw were married at Daphne in Baldwin County,Alabama,about 10 years ago .Mose Hall was one of the witnesses to the wedding,we lived together as man and wife until during the month of July 1916, during the month of July 1916,Jessina White left me ,she left me of her own free will ,this has been more than 2 years before I started my suit for divorce ,my wife has never been back to me since that time, she had no cause or excuse to leave me . I have lived in Baldwin County,Alabama, continuously all my life.

William White

J.M.Cauley,a witness for complainant testified as follows:-

My name is J.M.Cauley,I am a turpentine operator and reside at Gateswood ,Baldwin County,Alabama,I know William White,he has worked for me constantly since August,1919,and has lived right on the place all this time . William White,during all of this time,has lived alone and without any wife,he is over 21 years of age I do not know Jessina White but I do know she has never resided with William White while he has worked with me , I know William Whites general reputation in the community in which he lives and it is good,he is a hard working man ,peaceful and law abiding. My place where William White lives is in Baldwin County,Alabama.

J M Cauley

I, T.W.Richerson, as Register hereby certify that the foregoing deposition on oral examination taken down by me in writing in the words of the witness es 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, 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 24th day of August, 19.20

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 $.....

REGISTER'S FEES.

..... days at $1.50 per day $.....

..... words at 20 cents per hundred .....

No. 243. Page

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

William White,

vs. Complainant,

Jessina White,

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of 2 witnesses

for Complainant,

Filed 24th day of August, 1920

~~Published by order of the Court,~~

~~day of~~ ~~, 19~~

D. W. Richerson

Register.

MARSHALL & BRUCE CO., NASHVILLE

DEPOSITION TAKEN BEFORE REGISTER ON ORAL EXAMINATION, Code 3139. (Box 715.) 85605 MARSHALL & BRUCE CO., NASHVILLE

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

William White Complainant

vs.

Jessina White Defendant

Oral examination before the Register of the following witnesses:

Mose Hall and Paulite Hall,

who reside in Alabama, said examination being conducted in Bay Minette, Ala Alabama, on this the 26th day of August 1920, and there being present

Hon. N. C. Stoje Atty for Complainant,

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

Mose Hall witness for complainant testified as follows:-

My name is Mose Hall, I am fifty years old, I live at Daphne, in Baldwin County, Alabama, ~~and~~ where I have lived continuoisly for the past 28 years. I know William White and his wife Jessina White, they are both over 21 years old, William White lives in Baldwin County, Alabama, where he has lived continuously all of his life except what time he was in the army which was about 18 months. He lives at Gateswood now where he has lived for about the last 8 months. Jessina White lives in Mobile now I do not know exactly where. She has been living in Mobile since about August, 1916.

I remember when William White and Jessina White were married. It was at Daphne, Baldwin County, Alabama about ten years ago, to the best of my recollection about 1911.

They lived to-gether as man and wife until about August, 1916

When Jessina White left William White. It has been over two years since they ever lived to-gether as man and wife, from July 13. 1920 I know of no excuse that she had for leaving him.

Moses Hall

Pauline Hall, a witness for the complainant, testified as follows:-

My name is Pauline Hall. I am 40 years old. I live in Daphne, Baldwin County, Alabama, where I have lived all my life. I know William White and his wife Jessina White. I remember when they were married in Daphne, Alabama about ten years agp.

They are both over 21 years old. William White now lives at Gateswood Baldwin County, Alabama, where he has lived eight months, more or less. He has lived in Baldwin County, all his life. Jessina White lives in Mobile, Alabama, her street addr ss I do not know. She has been living there since about 1916, ever since they separated.

I remember when they separated in about August, 1916. As far as I know they have not lived to-gether as man and wife any time within the past two years, from July 13. 1920 I know of no excuse they had for separating.

Pauline Hall.

I, T.W.Richerson, as Register,

hereby certify that the foregoing deposition on oral examination taken down by me in writing in the words of the witness es 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, 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 26th day of August, 1920

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 $.....

REGISTER'S FEES.

..... days at $1.50 per day $.....

..... words at 20 cents per hundred .....

No. 243. Page

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

William White,

vs. Complainant,

Jessina White

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of ~~Complainant~~, Witnesses

for Complainant,

Filed 26 day of August, 19 20

Published by order of the Court,

day of, 19

Register.

MARSHALL & BRUCE CO., NASHVILLE

8550 REQUEST FOR DECREE IN VACATION.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 243. Vacation Term, 1920

William White Complainant

vs.

Jessina White 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

Complaiant, by Stone and Stone,

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.

Stone & Stone

Solicitor for Complainant.

6 R

No. 243. Page

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

William White

vs.

Jessina White

REQUEST FOR DECREE IN
VACATION.

Filed August 26th 1920

D M Rhemore
Register

Recorded in Record

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Register

8581 NOTE OF TESTIMONY.

William White,

vs.

Jessina White

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, decree pro confesso and testimony of William White, J.M.Cauley, Mose Hall and Paulite Hall,

and in behalf of Defendant upon

T. M. Richman

Register

7 R

No. 243.

THE STATE OF ALABAMA,

BALDWIN COUNTY

IN EQUITY,

CIRCUIT COURT OF BALDWIN COUNTY.

William White

vs.

Jessina White,

NOTE OF TESTIMONY.

Filed in Open Court this 26th

day of August 1920, 191

T. W. Richmond

Register