

Isaac Tunstall,)	
)	
Complainant,)	IN THE CIRCUIT COURT- EQUITY.
)	STATE OF ALABAMA.
vs)	BALDWIN COUNTY.
)	
Sadie Tunstall,)	
)	
Defendant,)	

By virtue of the Commission hereto annexed, issued from the office of the Clerk of the Circuit Court of Baldwin County, State of Alabama, I, the Commissioner therein named, have called and caused to come before me the said Isaac Tunstall, the witness named in said commission, on this the 30th day of July, 1920, at my office, 307 Title Guarantee Building, Birmingham, Alabama, and having duly cautioned and sworn the said witness to speak the truth, the whole truth, and nothing but the truth, Isaac Tunstall, the said witness, deposeth and saith as follows:

FIRST. To the first interrogatory he says: My name is Isaac Tunstall. Yes, I am the complainant in this cause. My wife's name is Sadie Tunstall. She is the defendant in this cause. Both myself and Sadie Tunstall are over the age of 21 years. My wife, Sadie Tunstall, now resides at Stockton, Baldwin County, Alabama. I am now residing or living temporarily at Docena, Route No. 2, Box 165, Pratt City, Ala., but this is not my permanent residence, and I intend to return to Baldwin County before very long. I have been at the above place, Docena, for about one month, working in the mine. Before I came to the last named place, Docena, my residence was at Stockton, Baldwin County, Alabama, my home, and where my mother and people live, and where I have lived for about 20 years. I consider that I am a citizen of Baldwin County, Alabama, and that I am a resident of that County.

SECOND.- To the second interrogatory he saith: Myself and my wife were married on October 4th of the year 1914. We were married at Lucedale, Mississippi. We lived together until August 10th of the year 1919, when my wife voluntarily left me, and without any just cause. At this time I was away at work most of the time, but she did not appear to be acting just right and doing what she ought to do, and I talked to her about it, but did not threaten or mistreat her. She said she was going to quit me, and did leave and go to her mother's. We were living at Stockton, Baldwin County, at the time she left me.

THIRD:- To the third interrogatory he saith: I do not now live with my wife. I did not leave her; she left me, as set out above. Before my wife left me on the occasion above set out I was not absolutely positive, or had no positive evidence, that my wife had committed adultery with other men, but her conduct and manner toward me for some time had not been what it ought to be, and I had suspicions that a man by the name of Austin Martin, who lived

(over)

Answer to Third Interrogatory- continued.

near where we lived, and who works for the Bay Poplar Lumber Company, had been visiting and paying her undue attention, and I did not catch them in the act of adultery and they did not begin to live in adultery until she had left me on the above named date, August 10, 1919. Yes, my wife, Sadie Tunstall, did commit adultery with one Austin Martin. The occasion of the act of adultery which I saw take place between my wife and Austin Martin was a little over a week after my wife left me, to be exact it was on August 19, 1919, which date I remember; it was nine days after she had left me. The act took place near where my wife was staying, there with her mother, at Stockton, out in the woods, near the road and toward the front of the house. Yes, I did see the act of adultery, and I know that it was my wife and Austin Martin. It was about nine o'clock at night. I was taking my sister from Nelse Jackson's house, where she had been that day, he being a friend of ours, to my mother's home. My wife's mother lived on the way, and my wife was staying there at her mother's. When myself and my sister had gotten a short distance past my wife's mother's house, out in the woods a short distance from the house, I saw and heard someone in the bushes. On looking closer and listening I knew that it was a man and woman, and they appeared in the act of committing sexual intercourse. My sister went on, and I looked closer, as I suspected that it might be my wife. The night was clear and the moon was shining bright, and I could see plainly on closer observation, and I could hear some conversation. After the act was over my wife went on back to her mother's house. I was quite close to them while they were committing the act, and I know that it was they because I knew them when I saw them in the bright moonlight. I knew them by their voices, by their size, looks, dress, the way they acted, and by the fact that my wife went on back to her mother's house, as there was no other young woman staying there. I did not attempt to commit any violence upon them, as I thought it was the best thing to get myself in any trouble over her the way she had done and was doing, and that it would not remedy things by getting in more serious trouble. After this I saw Austin Martin at my wife's house, or the house where she was staying with her mother, often and I saw them together frequently, and I understood that he claimed to be boarding with my wife's mother, but he was really living in adultery with my wife. As stated above, my sister was with me, and she saw the act of adultery set out above, but she did not stay as close by as long as I did. I have never lived with my wife since I found out or saw her commit the act of adultery set out above, nor have I lived with her at any time since she left me on August 10, 1919, nor have I forgiven her for the commission of the act of adultery or her other adulterous relations with Austin Martin or anyone else, nor condoned such conduct. I have no positive evidence of her committing adultery or living in adultery with anyone other than Austin Martin, except that she became loose and free in her conduct with men generally as much as I was able to observe in seeing her from time to time, and from what I heard from her.

Sadie Tunstall

I, Roy E. Perkins, the Commissioner in said commission named, do hereby certify that the foregoing testimony and answers,

(over)

continued--

taken down and written by me in the words of the witness, Isaac Tunstall, were read over to him; that he assented, swore to, and subscribed the same in my presence, at the time and place herein mentioned; that proof has been made before me of the identity of said witness; that I am not of counsel or kin to either of the parties to said cause, nor interested in the event thereof. And I inclose the said testimony, together with said commission and the interrogatories, direct (no cross), to the said Clerk of the Circuit Court whence the same emanated, as my full execution of said commission.

Given under my hand and seal, this the 30th day of July, 1920.



Commissioner.

.(L.S.)

-----X
ISAAC TUNSTALL,
Complainant.
-vs-
SADIE TUNSTALL,
Defendant.
-----X

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

INTERROGATORIES TO BE PROPOUNDED TO ISAAC TUNSTALL, THE COMPLAINANT
AND A MATERIAL WITNESS FOR THE COMPLAINANT:-

FIRST.

What is your name? Are you the complainant in this cause? What is your wife's name? Is she the defendant in this cause? Are you both over the age of 21 years? Where does your wife reside? Where do you now reside? How long have you been at this place? Where was your residence before you came to this last named place? Are you a citizen of Baldwin County, Alabama?

SECOND.

When were you and your wife married? Where? How long did you live together?

THIRD.

Do you now live with your wife? Why did you leave her? Since her marriage to you has your wife lived a proper life for a wife? Did your wife commit adultery with one Austin Martin? If so, when and where? Did you see the act of adultery? State in detail just what you saw take place at this place, if anything. Did anyone else see this? Who? Have you ever lived with your wife, forgiven her or condoned the act, since you found this out? Were there any other times when she committed adultery with anyone? If your answer to the last question is yes, state in detail what you saw take place.

Steuers & Steuers
SOLICITORS FOR COMPLAINANT.

Solicitors for complainant suggest Roy E. Perkins, ~~300 First Street~~,
Birmingham, Alabama, as a suitable person to act as Commissioner in
propounding the above interrogatories and prays that a commission issue
to him.

Steuers & Steuers
SOLICITORS FOR COMPLAINANT.

The State of Alabama,

CIRCUIT COURT.

Baldwin COUNTY.

Equity Division.

To Hon. Roy E Perkins 307 Title Guarantee Bldg Birmingham, Ala.

or such of you as may act herein, of Jefferson 6- County, State of Alabama, Greeting:

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

Isaac Tunstall the Complainant and a material witness for the Complainant,

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

Isaac Tunstall, is

Plaintiff, and

Sadie Tunstall

is

Defendant, and we hereby authorize and empower you to call and cause to come before you Isaac Tunstall

the said

witness and his deposition on the Holy Evangelists to take, as well for the

Complainant, as for the touching his 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 22nd day of July, 1920. 191

Witness' Fees, - - - \$

Commissioners' Fees, \$

R. E. Perkins Clerk.

Commissioner's fee has been paid

R. E. Perkins, Commissioner

5-R,

No.

The State of Alabama,

Baldwin County.

CIRCUIT COURT,

Equity DIVISION.

Isaac Tunstall,

vs. Plaintiff,

Sadie Tunstall,

Defendant.

COMMISSION TO TAKE DEPOSITION ON SET INTERROGATORIES.

Issued this 22 day of July, 1920, 191

Clerk.

WITNESSES:

Isaac Tunstall,

James A. ...

William ...

Subscribed by ...

MARSHALL & BRUCE CO., NASHVILLE

Oct 11 1920

Tunstall

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:

C D v. E F	To _____ Esq., CLERK OF THE CIRCUIT COURT.
DEPOSITION OF A B	
	_____ County, Ala.

Isaac Dumitall
Complainant

vs.
Sardie Dumitall
Defendant

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,

acceptance of service and answer
of Defendant + testimony of Isaac
Dumitall and Luverta Williams

and in behalf of Defendant upon

I. W. Williams

Register

96 R
No. 244

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Isaac Luntal

vs.

Isaac Luntal

NOTE OF TESTIMONY.

Filed in Open Court this *11*

day of *Oct* 191*7*

T. W. McKeown

Register

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 744 Term, 191.....

Isaac Dunitan

Complainant.....

vs.

Radie Dunitall

Defendant.....

To *Wm D W Peterson* 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 *Stone + 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.

No. 244

Page

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

Isaac Dumstall
Complainant

vs.

Radie Dumstall
Defendant

REQUEST FOR DECREE IN
VACATION.

Filed Oct 11 19120

T. Williams
Register

Recorded in Record

Vol. Page

Register

STATE OF ALABAMA,)
BALDWIN COUNTY.)

Isaac Tunstall,)
Complainant,) # _____,
VS)
Sadie Tunstall,) IN THE CIRCUIT COURT OF
Defendant.) BALDWIN COUNTY, IN EQUITY.

By virtue of the commission hereto annexed, issued from the office of the Clerk of the Circuit Court of Baldwin County, State of Alabama, I, the commissioner therein named, have called and caused to come before me the said Luverta Williams, the witness named in said commission, on this the 1st day of October, 1920, at my office, 307 Title Guarantee Building, Birmingham, Ala. and having duly cautioned and sworn the said witness to speak the truth, the whole truth, and nothing but the truth, Luverta Williams, the said witness, deposeseth and saith as follows:

FIRST.-- To first interrogatory she saith:

My name is Luverta Williams. For the time being I am living at Docena, Alabama, Route No. 2, Box 165, Pratt City, Alabama. Before I moved to my present place of residence, I lived in the City of Mobile. I have lived at Stockton in Baldwin County, Alabama, and lived there for 19 years. Yes, I know Isaac Tunstall and Sadie Tunstall. Yes, they are husband and wife. Yes, I know when they married. Isaac Tunstall is 27 years of age, and Sadie Tunstall is over the age of 21 years, and is about 28 years old. Isaac Tunstall is now living at Docena, though he claims Baldwin County as his residence or home. Sadie Tunstall is yet living at Stockton, in Baldwin County, Alabama, unless she has moved very recently.

SECOND.-- To the second interrogatory she saith:

Isaac Tunstall and Sadie Tunstall were married at Lucedale, Mississippi, on October 4, 1914. I was not personally present, but know this to be a fact.

THIRD.-- To the third interrogatory she saith:

Yes, since the marriage of Isaac Tunstall and Sadie Tunstall, I have known them, known of their whereabouts, and something of their affairs. I lived near them, that is, in the immediate vicinity, only about a year after they were married. I moved to Mobile after living near them for about a year after they were married, but I visited my mother at Stockton very often, and also visited Isaac Tunstall and his
(over)

(answer to Third Interrogatory continued)

wife, Sadie Tunstall, at their home at Stockton very often. I do not know about the conduct of Sadie Tunstall all the time since she and Isaac were married, that is, in detail or from daily observation, as I moved to Mobile about a year after they were married, but I did make some observation of her manner and conduct while I lived near them, and when on my visits to them, and I also know what the people had to say,, but I did not know positively of any act of adultery that she committed until I saw her one night, when I was on a visit to Stockton, to see my mother and brother.

FOURTH-- To the Fourth Interrogatory she saith;

Yes, I know Austin Martin, have known him for a good many years, and went to school with him. Yes, before I had seen them in the act of adultery, and before the separation had taken place, in May 1919, he had come to my house in Mobile, in company with Sadie Tunstall; and on my visits to see my mother and brother at Stockton, I could observe and hear that Austin Martin had seemed to be unduly interested in my brother's wife, Sadie Tunstall, though I did not know of any actual act of adultery except on the occasion mentioned herein. Yes, I saw Sadie Tunstall commit adultery with Austin Martin. It was on the occasion of a visit to my mother and brother at Stockton, in August, 1919, a short time after my brother and Sadie Tunstall had separated. I had stopped at Nelse Jackson's house that day, and that night, my brother, Isaac Tunstall, was taking me to my mother's. We were passing the house of the mother of Sadie Tunstall, where Sadie Tunstall was staying. A short distance out in the woods, on the side of the road, out in front of the house, we heard a noise, heard someone talking, a man and woman, and I know that the woman was Sadie Tunstall by her voice and size, and by the fact that she went on back to her mother's house after a while. My brother, Isaac Tunstall, staid closely and watched, and I walked on a short distance, but I could see that the woman was Sadie Tunstall. The night was clear, and there was plenty of light, as the moon was shining bright. When we came upon them they were laying down together. I am informed that Austin Martin stayed at the house of the mother of Sadie Tunstall after that, and was considered by the people to be living with Sadie Tunstall. I am the sister of Isaac Tunstall. Isaac Tunstall has never lived with his wife since they separated in August 1919, and since the commission of the act of adultery which I have just testified about.

Luveta Williams

I, Roy E. Perkins, the commissioner in said commission named, do hereby certify that the foregoing testimony and answers were taken down and written by me in the words of the witness, Luveta Williams, were read over to her, that she assented, swore to and subscribed the same in my presence, at the time and place herein mentioned; that proof has been made before me of the identity of said witness; that I am not of counsel or kin to either of the parties to said cause, nor interested in the event thereof. And I inclose the said testimony, together with said commission and the interrogatories, direct (no cross), to the said Clerk of the Circuit Court whence the same emanated, as our full execution of said commission. Given under my hand and seal this the 1st day of October, 1920.

Roy E. Perkins
Commissioner.

-----X
 ISAAC TUNSTALL,)
 Complainant.)
 -vs-)
 SADIE TUNSTALL,)
 Defendant.)
 -----X

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

INTERROGATORIES TO BE PROPOUNDED TO LUVERTA WILLIAMS, A MATERIAL WITNESS FOR THE COMPLAINANT:-

FIRST:-

What is your name and where do you live? Where did you live before you moved to your present place of residence? Did you ever live at Stockton in Baldwin County, Alabama. Do you know Isaac Tunstall and Sadie Tunstall? Are they husband and wife? Do you know when they were married? How old ^{are} ~~is~~ each of them? Where does each of them live?

SECOND.

Please state when and at what time Isaac Tunstall and Sadie Tunstall were married if you know.

THIRD.

Since the marriage of Isaac and Sadie Tunstall have you know them? Have you lived near them, if so, state in particular? Since their marriage has the conduct of Sadie Tunstall been good or bad? Why?

FOURTH.

Do you know Austin Martin? Did you ever see Sadie Tunstall in company with Austin Martin? If so, state time and places and circumstances surrounding same. Did you ever see Sadie Tunstall commit adultery with Austin Martin? If yes, state fully the circumstances surrounding the act, the time, place, everything you saw and who was with you. What relation are you to Isaac Tunstall? Has Isaac Tunstall ever lived with his wife since that time?


 SOLICITORS FOR COMPLAINANT.

Solicitors for complainant suggest Roy E. Perkins, 307 Title Guarantee Building, Birmingham, Alabama, as a suitable person to act as commissioner in propounding the above interrogatories and pray that a commission to that effect issue to him.


 SOLICITORS FOR COMPLAINANT.

The State of Alabama,)

CIRCUIT COURT.

Baldwin COUNTY.)

Equity Division.

To Hon. Roy E Perkins,

or such of you as may act herein, of Baldwin County, State of Alabama, Greeting:

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

Luverta Williams,

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

Isaac Tunstall,

Plaintiff, and Sadie Tunstall,

Defendant, and we hereby authorize and empower you to call and cause to come before you Luverta Williams,

the said witness and her deposition on the Holy Evangelists to take, as well for the Complainant, 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 22nd day of Septemner, 1920, 191--

Witness' Fees, - - - \$

Commissioners' Fees, \$

J. W. Rice Clerk.

4 R

No. 235

The State of Alabama,
Baldwin County.

CIRCUIT COURT,

Equity DIVISION

Isaac Tunstall

Plaintiff,

vs.

Saide Tunstall

Defendant.

COMMISSION TO TAKE DEPOSITION ON SET INTERROGATORIES.

Issued this 22 day of

Sept 1920

191

M. Williams Clerk.

WITNESSES:

Luverta Williams

Filed Oct 4/1920
J. M. Williams Register

Approved Oct 11/1920
J. M. Williams Register

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:

<p>C D v. E F</p> <p>_____</p> <p>DEPOSITION OF</p> <p>A B</p>	<p>To _____ Esq.,</p> <p>CLERK OF THE CIRCUIT COURT.</p> <p>_____</p> <p>_____ County, Ala.</p>
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Isaac Tunstall,
Complainant.

-vs-

Sadie Tunstall,
Defendant.

In the Circuit Court, Baldwin
County, Alabama, Equity Side.

Comes the defendant, Sadie Tunstall, in the above stuled cause and files this her answer to the original bill of complaint in this cause filed and says:-

FIRST

She denies each and every paragraph of the bill of complaint and all of the allegations contained therein and demands strict proof thereof.

Sadie ^{her} Tunstall

Defendant waives notice of taking of testimony or other steps and consents that this cause be submitted in vacation.

Sadie ^{her} Tunstall

Sworn to and subscribed before me this
14 day of July, 1920.

W. H. McMillan
Notary Public, Baldwin County, Ala.



BOND

BOND

ANSWER OF DEFENDANT.

ISAA C TUNSTALL.

-VS-

SADIE TUNSTALL.

Filed in this office this

July 14th., 1920.

D. W. Riceman

Register.



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

Sadie Junntall

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

James Junntall

against said *Sadie Junntall*

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

13

day of

July

192*0*

T. W. Richerson

Register.

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

26- *Alley*

Serve on *left*

Circuit Court of Baldwin County
In Equity

No. *235*

SUMMONS

Isaac Sumstall

vs.

Sadie Sumstall

Stuart Starn

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this _____
day of _____ 192__

Sheriff

Executed this _____ day of _____
192__

by leaving a copy of the within summons with

Defendant

Sheriff

By _____
Deputy Sheriff

I hereby accept service of the within summons.

Witnesses;

X Sadie Sumstall

W. H. Miller

J. R. Phillips

2 rec

-----X
ISAAC TUNSTALL,
Complainant.)
-vs-)
SADIE TUNSTALL,
Defendant.)
-----X

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

No. _____

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

Comes your complainant, Isaac Tunstall, and exhibits this, his original bill of complaint for divorce against the defendant, Sadie Tunstall, and for grounds thereof respectfully represents and shows unto your Honor as follows:-

FIRST:-

That both the complainant and the defendant are over the age of twenty-one years and are "bona fide" residents of Baldwin County, Alabama.

/SECOND:-

That the complainant and the defendant were married on to-wit; October 4th., 1915 in Lucedale, Mississippi and lived to-gether as man and wife until to-wit; August 10th., 1919.

THIRD:-

That since the marriage of the defendant to the complainant the said defendant has become a lewd and immoral woman; that the defendant committed adultery with one Austin Martin; that the complainant has never condoned or forgiven said adulterous acts on the part of the defendant.

PRAYER FOR PROCESS.

The Premises considered, complainant prays that your Honor will cause to be issued such orders, decrees, subpoenas and summons as will make the said defendant, Sadie Tunstall, party respondent to this cause, 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 complainant prays that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between the defendant and the complainant be forever dissolved; that your complainant be agains permitted to con-

tract the marriage relation if he so desires. And, as in duty bound,
he will ever pray, etc., etc.,

Stours Stours
SOLICITORS FOR COMPLAINANT.

FOOT NOTE:-

The defendant, Sadie Tunstall, 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.

Stours Stours
SOLICITORS FOR COMPLAINANT.

BOND

STOUR

STOUR

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 244 CIRCUIT COURT, IN EQUITY.

Isaac Tunstall, Complainant.....

vs.
Sadie Tunstall, Defendant.....

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, ~~decreed pro confesso~~
Answer of Defendant,

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.....

his 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.....

Isaac Tunstall, is forever divorced from the said

Sadie Tunstall for and on account of

Adultery,

..... as alleged in said Bill of Complaint;

It is further ordered, that the said Isaac Tunstall,

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 Isaac Tunstall,

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 Sadie Tunstall

It is further ordered, adjudged and decreed that said Isaac Tunstall,

shall not again marry except to said Sadie Tunstall,

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except
to said Saide Tunstall, during the pendency of said appeal.

This 18th day of October 1920, 1912.

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

No. 244.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Isaac Tunstall,

vs.

Sadie Tunstall.

DECREE OF DIVORCE.

Filed in office this

18th

day of

Oct

1910

Register.

E. O. M.

(Recorded
on Minutes)

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 Sadie Tunstall,

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

Isaac Tunstall,

against said Sadie Tunstall,

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 2nd, day of Sept, 192.....

T. W. Richerson
Register.

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

Copy

Serve on _____

Circuit Court of Baldwin County
In Equity

No. _____

SUMMONS

Spacie Mustall

vs.

Shelie Mustall

Stone & Stone

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this _____
day of _____ 192__

Sheriff

Executed this _____ day of _____
192__
by leaving a copy of the within summons with

Defendant

Sheriff

By _____
Deputy Sheriff

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 Sadie Tunstall,

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

Isaac Tunstall,


against said

Sadie Tunstall,

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 2nd, day of Sept,

192.....



Register.

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

-----X
ISAAC TUNSTALL,
Complainant.

-VS-

SADIE TUNSTALL,
Defendant.
-----X

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

No. _____

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

Comes your complainant, Isaac Tunstall, and exhibits this, his original bill of complaint for divorce against the defendant, Sadie Tunstall, and for grounds thereof respectfully represents and shows unto your Honor as follows:-

FIRST:-

That both the complainant and the defendant are over the age of twenty-one years and are "Ebona fide" residents of Baldwin County, Alabama.

SECOND:-

That the complainant and the defendant were married on to-wit; October 4th., 1915 in Lucedale, Mississippi and lived together as man and wife until to-wit; August 10th., 1919.

THIRD:-

That since the marriage of the defendant to the complainant the said defendant has become a lowd and imoral woman; that the defendant committed adultery with one Austin Martin; that the complainant has never condoned or forgiven said adulterous acts on the part of the defendant.

PRAYER FOR PROCESS.

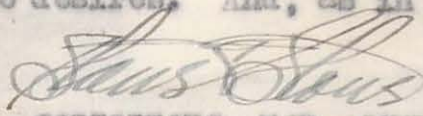
The Premises considered, complainant prays that your Honor will cause to be issued such orders, decrees, subpoenas and summons as will make the said defendant, Sadie Tunstall, party respondent to this cause, requiring her to appear and plead, answer or demur within the time required by law, under the pains and penalties of this Honorable Court.

PRAYER FOR RELIEF.

That upon a final hearing of this cause complainant prays that your Honor will render, adjudge and decree that the bonds of matrimony heretofore existing between the defendant and the complainant be forever dissolved; that your complainant be agains permitted to con-

page to 0-

tract 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, Sodie Tunstall, 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 here-
by expressly waived.



SOLICITORS FOR COMPLAINANT.

Handwritten notes:
2/11/1900
Stanslow
133/134