

Lorena Morgan, Complainant )  
 vs. ) Circuit Court, Baldwin County, Alabama.  
 Silas Morgan, Defendant. )  
 \* In Equity.

To the Hon. John D. Leigh, Judge of the Twenty-first Judicial Circuit of the State of Alabama:

The Bill of Complaint of Lorena Morgan against Silas Morgan. respectfully shows to your Honor as follows:

1.

That she is over the age of twenty-one years and is a bona fide resident of Baldwin County in the State of Alabama, and has been such resident for more than three years next before the filing of this bill of complaint; that Silas Morgan, the defendant, is also over twenty-one years of age and is a resident of Baldwin County, Alabama

2.

That Oratrix and said Silas Morgan were lawfully married at Stockton, Alabama, on or about the 14th day of August 1913, the marriage serimony being performed by the Rev. George Griffin, a ~~mn~~ minister of the gospel. That she and the said Silas Morgan lived together after their marriage at Tensaw, Alabama, for something over two years. after their marriage.

During all the time they lived together she was a faithful wife to the said Silas Morgan, but for some reason he seemed to grow tired of her, and in the month of November 1915 he ordered her to leave his house and drove her from her home. Since then she has earn- her own living by such work as she could get in the neighborhood of Stockton, or wherever she could get work. The Defendant has contrib- uted nothing towards her support since he drove her from his home.

She therefore charges that he has voluntarily abandoned her for more than two years next preceding the filing of this Bill.

Prayer for Process.

The premises considered she prays that the States writ of Sub- poena issue to the said Silas Morgan, commanding and requiring him to plead, answer or demur to this her Bill of Complaint within the time required by law and the rules of this Court.

Prayer for Relief.

And may it please your Honor on the coming in of the testimony in this cause to make and render a decree dissolving the bonds of matrimony now existing between your Oratrix and said Silas Morgan, and that your Honor will further decree that she be permitted to marry again, and for such other, further and differen relief as to your Honor may seem meet and proper in the premises.

*M. S. Anderson*

Solicitor for Complainant.

Foot note:

The defendant is required to answer all the allegations in this her Bill of Complaint, but not under oath, his oath being here- in specially waived, said allegations are contained in paragraphs one and two both inclusive.

*M. S. Anderson*

Solicitor for Complainant.



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 Silas Morgan,

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.....

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

Lorena Morgan,

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against said

Silas Morgan,

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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 27th day of July.

.....1920.....

*T. W. Richerson*

Register.

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



2nd Original R

Serve on \_\_\_\_\_

Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

Lorens Morgan,

vs.

Silas Morgan,

W.S. Anderson

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

*Deft Silas Morgan  
Lives near Tensley*

THE STATE OF ALABAMA  
BALDWIN COUNTY

Received in office this \_\_\_\_\_  
day of \_\_\_\_\_ 192

Sheriff

Executed this 7<sup>th</sup> day of  
August 1920

by leaving a copy of the within summons with  
Sigh Morgan

Defendant

Sheriff

By S. W. Shafter, Jr.  
Deputy Sheriff

The State of Alabama, }  
BALDWIN COUNTY.

No. 247 CIRCUIT COURT IN EQUITY.

*Lorena Morgan*

Complainant...

vs.

*Silas Morgan*

Defendant...

Motion is hereby made for a Decree Pro Confesso against .....

*Silas Morgan*

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 11<sup>th</sup> day of Sept 1920.

*Wm. S. Anderson*

Solicitor.



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No. 247 Page .....

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Lorena Morgan

Vs.

Silas Morgan

MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE

Filed Sept 11<sup>th</sup> 1922

J. W. Ricurion

Register.

Recorded in ..... Record,

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

Register.

Baldwin Times Print, Bay Minette.

THE STATE OF ALABAMA,

Baldwin County.

No. 247

CIRCUIT COURT, IN EQUITY.

Lorena Morgan

Complainant

vs.

Silas Morgan

Defendant

In this cause it appears to the

Register

that a Summons requiring the Defendant,

Silas Morgan

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 him, Silas Morgan

was served upon him by the Sheriff of Baldwin County, Alabama, on the

7<sup>th</sup> day of August

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

M. S. Anderson, Solicitor 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

Silas Morgan

Defendant aforesaid.

This 13<sup>th</sup> day of September 1920.

D. W. Reardon

Register.



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THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Lorena Morgan

vs.

Silas Morgan

DECREE PRO CONFESSO ON  
PERSONAL SERVICE.

Issued Sept 13<sup>th</sup> 1920

J. W. Ricumson  
Register.

Recorded in.....Record,

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

Register.



THE STATE OF ALABAMA,

*Barbour* County.

CIRCUIT COURT, IN EQUITY.

*Lorena Morgan*

Complainant.....

vs.

*Silas Morgan*

Defendant.....

No.....

Now comes the *Complainant* by *W. L. Anderson* her

Solicitor of Record, and makes application to the Register of said Court to issue a Commission to take the testimony in said cause, or oral examination, of the following named witnesses, who reside within the State of Alabama:

NAME OF WITNESS.

RESIDENCE OF WITNESS.

*Lorena Morgan*  
*Essie Stevens*

*Stockett, Ala*  
*Bay Minette, Ala.*

And *he* suggests the name of *W. Richardson, Register of this Court* who resides at ..... as a suitable person to ~~be appointed Commissioner~~ to take the testimony of said witnesses.

This *20<sup>th</sup>* day of *September* 19*20*.

*W. L. Anderson*  
Solicitor for *Complainant*

The Applicant for said Oral Examination is hereby required to give in writing ..... days notice thereof, before the examination is taken, to the adverse party, or to ..... Solicitor ..... of Record, if either reside ..... in this District, but if neither reside therein, the notice may be given by entry on the Order Book of the Clerk.

Register.



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No. ....

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL  
EXAMINATION.

Lorena Morgan

vs.

Silas Morgan

Filed in office this

20<sup>th</sup>

day of

Sept

19

J. M. Ricurson

Register.

*[Faint vertical handwriting, possibly a date or name]*

*[Faint vertical handwriting, possibly a date or name]*

*[Faint vertical handwriting, possibly a date or name]*



The State of Alabama, ..... Baldwin ..... County.

CIRCUIT COURT, IN EQUITY.

..... Lorena Morgan, ..... Complainant

vs.

..... Silas Morgan ..... Defendant

Deposition of ..... Lorena Morgan and Essie Stevens, .....

By virtue of the appointment to take the Deposition, indorsed in writing, on ~~the interrogatories by the~~ <sup>oral examination</sup>  
~~Solicitor filing the same~~ in the above stated cause pending in said Court of said County, I, .....

..... T. W. Richerson ....., Register of said Court of said County, have called and  
caused to come before me ..... Lorena Morgan and Essie Stevens .....

..... demand for oral examination .....  
the witness ..... named in the ~~interrogatories, and~~ having first sworn the said witness ..... to speak the truth, the  
Lorena Morgan  
whole truth and nothing but the truth, the said witness/deposes and says as follows:

..... My name is Lorena Morgan, I am thirty one years of age and  
reside in Baldwin County, Alabama, I have resided in Baldwin County,  
Alabama, all my life, I have been a bona fide resident of Baldwin  
County for three years next before the filing the Bill in the above  
stated case. I am the Complainant in said case. Silas Morgan is the  
defendant in said case. he is about thirty four years of age and is  
a resident of Baldwin County, Alabama, and has been such resident all  
his life. Silas Morgan was married to me on or about the 14th day of  
August 1913 at Stockton, Alabama, by the Rev George Griffin, and we  
lived together as man and wife until some time in the month of Novem-  
ber 1915, when he drove me off and has never lived with me since.  
We were living at Tensaw and he moved me out of his house with all my  
things and took me to my grand-mother near Stockton, Alabama. He has  
ever since refused to live with me as his wife. During the time since  
he drove me off he has never contributed in any way to my support but  
I have had to make my own living.

I was a good wife to him all the time we lived together and never  
gave him any cause to drive me off.

*Lorena Morgan*



Essie Stevens Witness for Complainant being duly sworn testified  
as follows:-

My name is Essie Stevens, I am over 21 years of age and  
reside in Bay Minette, Alabama, I formerly resided at Stockton, Alabama,  
and I knew Lorena Morgan and Silas Morgan, I was present at their  
wedding they were married in 1913, shortly after they were married  
they went up to Tensaw, Alabama, where they lived until their separation.  
I saw them frequently after they were married and living at Tensaw,  
Lorena was a good wife to Silas during the time they lived together.  
I never heard of any cause for his driving her off.

Sometime in the year 1915, he sent her back to her Grand Mother  
at Stockton and he has never lived with her since, they are both  
residents of Baldwin County, Alabama, all their lives. Silas Morgan had  
no reason for turning her off so far as I knew or was able to find  
out except that he was tired of her and wanted to make room for  
another woman

*Essie Stevens*



I, T. W. McQuinn, the said Register, hereby certify that the foregoing testimony was taken down in writing by myself in the words of the witness, and were read over to them, that they assented, swore to and subscribed the same in my presence, the 21 day of September, 1920, at Bay Minneter, Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and 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.

And I enclose the deposition, together with the Interrogatories, Direct and Cross, and the documents which were deposed to, in an envelope properly endorsed and sealed and placed the same on file in my office.

Given under my hand and seal this the 21 day of Sept, 1920.  
T. W. McQuinn, Register.

WITNESS FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

- ..... days' attendance at \$1.50 per day..... \$
- ..... days' attendance at \$1.50 per day..... \$
- ..... days' attendance at \$1.50 per day..... \$
- ..... days' attendance at \$1.50 per day..... \$
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- ..... days' attendance at \$1.50 per day..... \$

REGISTER'S FEES.

- ..... days at \$1.50 per day..... \$
- ..... words at 20 cents per hundred..... \$



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**The State of Alabama,**

\_\_\_\_\_ COUNTY.

**IN CIRCUIT COURT, IN EQUITY.**

*Lorena Morgan*

vs. Complainant,

*Silas Morgan*

Defendant.

Deposition Taken Before Register on <sup>Oval Spurred</sup> Interrogatories.

Deposition of *Witness*

for *Complainant*

Filed *21* day of *Sept*, 19*20*

Published by order of the Court \_\_\_\_\_

\_\_\_\_\_, 191\_\_\_\_

*M. R. ...*  
Register.



THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

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

*Lorena Morgan*

Complainant.....

vs.

*Selas Morgan*

Defendant.....

To *J. W. Richardson*....., Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the

Complainant, by *W. S. Anderson*.....

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.

*W. S. Anderson*

Solicitor for Complainant.



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No. 247 Page .....

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

*Lorena Morgan*

vs.

*Silas Morgan*

REQUEST FOR DECREE IN  
VACATION.

Filed Sept 27<sup>th</sup> 1920

*T. H. Robinson*

Register

Recorded in ..... Record

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

Register



*Lorna Morgan*

.....  
.....

vs.

*Silas Morgan*

.....

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, .....

*deposits and testimony of  
Lorna Morgan & Essie Thomas*

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.....  
.....

~~and in behalf of Defendant upon~~ .....

.....  
.....  
.....

*J. W. Ricerson*

Register



65w

R

No. 247

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Lorna Morgan

vs.

Pilar Morgan

NOTE OF TESTIMONY.

Filed in Open Court this 27th

day of Sept 1912

W. H. Harrison

Register



THE STATE OF ALABAMA,  
BALDWIN COUNTY.

No. 247.

CIRCUIT COURT, IN EQUITY.

Lorena Morgan

Complainant.....

vs.

Silas Morgan

Defendant.....

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

Lorena Morgan

is forever divorced from the said

Silas Morgan,

for and on account of

Voluntary abandonment.

as alleged in said Bill of Complaint;

It is further ordered, that the said Lorena Morgan 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 Lorena Morgan, 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 Silas Morgan,

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

This 21 day of October 1910

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



No. 247/.....

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.  
BALDWIN COUNTY, ALA.

Lorena Morgan

vs.

Silas Morgan,

DECREE OF DIVORCE.

Filed in office this 4th

day of Oct 1910

T. M. Richardson  
Register.

E. O. M.

(Recorded on  
summary)