

248

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 Will Jones,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Lula Jones,

against said Will Jones,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 31st. day of July,

192.

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
~~copy~~

Serve on ~~Will Jones near Tensaw, Ala.~~

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County
In Equity

Received in office this 31st
day of July, 1920. 192

No. _____

SUMMONS

Sheriff

Lula Jones,

Executed this 7th day of
August 1920

[Handwritten signature]

by leaving a copy of the within summons with
Will Jones

Defendant

W.R. Stitt

Sheriff

vs.

By N.W. Slaughter Jr.
Deputy Sheriff

Will Jones,

Hon. W.S. Anderson. -

Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,

No. 248

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Lula Jones

Complainant

vs.

Will Jones

Defendant

In this cause it appears to the

Register

that a Summons requiring the Defendant

Will Jones

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

Will Jones

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

7th

day of

August

1920

County, Alabama, on the

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

Mr. Hudson 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

Will Jones

Defendant aforesaid.

This

13th

day of

September

1920

D. W. Beaman

Register.

THE STATE OF ALABAMA,

Madison County.

CIRCUIT COURT, IN EQUITY.

Lula Jones

vs.

Will Jones

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued Sept 13th 1922

J. M. Pearson
Register.

Recorded in.....Record,

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

Register.

The State of Alabama, }
BALDWIN COUNTY.

No. 248 CIRCUIT COURT IN EQUITY.

Lala Jones

Complainant.....

vs.

Will Jones

Defendant.....

Motion is hereby made for a Decree Pro Confesso against

Will Jones

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 11th day of Sept 1920.....

M. S. Anderson

Solicitor.

300 R

No. *248*

Page

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Lula Jones

Vs.

Bill Jones

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed *Sept 11th* 192*0*

W. J. Rimmer
Register.

Recorded in Record,

Vol. Page

Register.

NAH
W. J. Rimmer
Sept 11th
1920
W. J. Rimmer
Register

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Lula Jones, Complainant vs.

Will Jones, Defendant

Oral examination before the Register of the following witnesses:

Lula Jones, Mollie Patrick,

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, on this the 15th day of September 1920, and there being present

Hon. W.S. Anderson Atty for Complainant,

Lula Jones

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

My name is Lula Jones, I am the Complainant in this case, I am over 40 years of age and I am a bonafide resident of Baldwin County, Ala, and have been such resident for more than 3 years next before the filing of the bill in this case.

in Baldwin Co, Ala,

I was married to Will Jones, the defendant in October 1902, and we lived together about six years as man and wife, when he put me out of the house and drove me off and refused to let me live with him, he has never lived with me since then, he has never contributed in any way toward my support since he drove me off and I have had to earn my own living ever since.

Will Jones is a resident of Baldwin County, Alabama, and has been such for many years, he is over the age of 21, he drove me off without any just cause or excuse and has since refused to live with me as his wife.

Lula Jones

Mollie Patrick a witness for Complainant who being duly sworn testified as follows:

My name is Mollie Patrick and am over 21 years of age, and reside at Tensaw, Baldwin County, Alabama, I have known Lula Jones and Will Jones a good many years I knew them before they were married and all the time they lived together as man and wife, I always considered Lula Jones a good wife to Will Jones, and I never knew any reason why he should not have been satisfied with her, more than 10 years ago he drove her off from his home and he has never lived with her since, he had no cause to drive her away or to cease to live with her so far as I knew or could find out and I was living in their neighborhood at the time ., both Lula Jones and Will Jones live near, Tensaw, in Baldwin County Alabama, and have lived there continuously for the last 15 or 20 years .

Attest
H. S. Anderson

^{her}
Mollie Patrick
Mark

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 es, 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 15th day of September 1920, 19.....

T.W. Richerson (L. S.)

WITNESS FEES.

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

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

REGISTER'S FEES.

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

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Luce Jones

vs. Complainant,

Grace Jones

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of Witness

for Complainant

Filed 15 day of Sept, 1920

Published by order of the Court,

day of _____, 19____

D. M. Williams

Register.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 248 Term, 1910.....

Lula Jones
.....

Complainant.....

vs.

Will Jones
.....

Defendant.....

To *J. W. Anderson*, 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 *M. 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.

M. S. Anderson
.....

Solicitor for Complainant.

7 R

No. 248 Page

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

Lula Jones
vs.
Will Jones

REQUEST FOR DECREE IN
VACATION.

Filed Sept 27th 1910
T. W. Rice
Register

Recorded in Record

Vol. Page

Register

THE STATE OF ALABAMA,

Barham County.

CIRCUIT COURT, IN EQUITY.

Lula Jones

Complainant.....

vs.

Will Jones

Defendant.....

No.....

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

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 witness....., who reside within the State of Alabama:

NAME OF WITNESS.

RESIDENCE OF WITNESS.

Lula Jones
Mollie Patrick

Tensas Ala

" "

And *I* suggests the name of *W.L. Anderson* Register of this Court who resides at *Bay Smith Ala* as a suitable person to be appointed Commissioner to take the testimony of said witness.....

This *14* day of *Sept* 19*20*.

W.L. Anderson

Solicitor for *Compt*

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.

No.

5-cc R

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL
EXAMINATION.

Lula Jones

vs.

Prill Jones

Filed in office this

14

day of

Sept

1920

M. M. McCreary

Register.

Lula Jones

Wice Jones

vs.

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,

Testimony of Lula Jones, Mollie Patrick,

and in behalf of Defendant upon

M. W. [Signature]

Register

8 R

No. 248

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Luce Jones

vs.

Will Jones

NOTE OF TESTIMONY.

Filed in Open Court this 27

day of Sept 1912

D. W. [Signature]

Register

Lula Jones,)
 Complainant,) In the Circuit Court of Baldwin County,
 vs.) Alabama.
 Will Jones,)
 Defendant.) In Equity.

To the Hon. John D. Leigh, Judge of the Twenty-first Circuit of the State of Alabama, sitting in Baldwin County, Alabama:

1. The Bill of Complaint of Lula Jones against Will Jones, respectfully shows unto your Honor, that she is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama, and has been such resident for more than three years next before the filing of this Bill of Complaint; that said Will Jones, the defendant is also over the age of Twenty-one years and resides near Tensaw in Baldwin County, Alabama, and has so resided for many years.
2. Complainant shows unto your Honor, that she and said Will Jones were married in Baldwin County, Alabama, on the *2nd day of October 1902* that they lived together as man and wife, for about *Six* years, when the said Will Jones, without just cause abandoned Complainant in the month of May, 1908, and has never lived with her since.
3. Complainant further shows to your Honor, that since he left her said Will Jones has contributed nothing to her support, but she has made her own living, and he has always refused to return and live with her as his wife.

Prayer for process.

Wherefore Complainant prays that the States writ of subpoena may issue out of this Court directed to the said Will Jones, commanding him to plead answer or demur to this her Bill of Complaint within the time and according to the rules of this Court.

Prayer for Relief.

The premises considered Complainant prays that your Honor will take jurisdiction of this cause and upon the coming in of the testimony your Honor will render a decree dissolving the bonds of matrimony now existing between Oratrix and said Will Jones, and will further and decree that Oratrix may be permitted to marry again; and for such other further or different relief as to your Honor may seem meet and proper under the evidence in the case.

Wm S. Anderson
 Solicitor for Complainant.

Foot note:

The defendant is required to answer each paragraph of the foregoing Bill of Complaint from paragraph 1 to paragraph 3, both inclusive, but not under oath, his oath being expressly waived.

Wm S. Anderson
 Solicitor for Complainant.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. 248. CIRCUIT COURT, IN EQUITY.

Lula Jones Complainant.....

Will Jones vs. Defendant.....

This cause, coming on to be heard at this T... submitted upon the Bill of Complaint, decree pro confesso

and testimony as noted by the Register; and, upon... ation 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.....

Lula Jones, is forever divorced from the said

Will Jones, for and on account of

Voluntary abandonment,

as alleged in said Bill of Complaint;

It is further ordered, that the said Lula Jones,
be, and... She is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Lula Jones,
pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found,"
then execution for such costs may issue against the said Will Jones,

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

This 30 day of September, 1920. 191.

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