ANDREW W. WHITE, Complainant. -vs- FANNIE BEARD WHITE, Defendant.	IN THE CIRCUIT COURT-EQUITY SIDE STATE OF ALABAMA BALDWIN COUNTY No.___

TO THE HONORABLE, THE CIRCUIT COURT OF BALDWIN COUNTY, EQUITY SIDE, AND THE HON. A. E. GAMBLE, JUDGE THEREOF, IN EQUITY SITTING:-

Your Orator, Andrew W. White, brings this, his original bill of complaint for divorce against Fannie Beard White and respectfully represents and shows unto your Honor and unto this Honorable Court as follows;

" F I R S T ."

That he is a bona fide resident of Baldwin County, State of Alabama, residing at Perdido. That he has been such resident for more than three years next immediately preceeding the filing of this bill of complaint. That he is over the age of twenty-one years. That the defendant, Fannie Beard White, is over the age of twenty-one years, is a non-resident of the State of Alabama, and when last heard from resided in Cuthbert in the State of Georgia.

" S E C O N D ."

That Orator and the said Fannie Beard White were married at Milton, Florida, on to-wit; April 15th, 1914, and lived to-gether as man and wife until on to-wit, January 1st, 1915.

" T H I R D ."

That on towit, January 1st, 1915, the said Fannie Beard White voluntarily deserted and abandoned your Orator, without just cause or legal excuse, and has so continuously abandoned and deserted your Orator since that time.

" F O U R T H ."

That there was born to Defendant and Orator by said marriage one female child named Ornett White 4 YEARS old who is now residing with Orator at this home near Perdido. That the defendant Fannie Beard White is not a fit or proper person to have the care, custody and control

of said female child, nor is she able to care for, maintain, educate and support said child. That Your Orator is a fit and proper person to have the custody and control of said child and is amply able to maintain and educate her.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED: Orator prays thatsuch orders and decrees be made and issued necessary to make the said Fannie Beard White a party respondent to this original bill of complaint, requiring her to appear and plead, answer or demur to the same 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 bondsof matrimony heretofore existing between Orator, Andrew W. White, and Defendant, Fannie Beard White, be forever dissolved; that your Honor will grant unto Orator the care, custody and control of said female child, Ornett White; and that Your Honor will allow Orator to again contract the marriage relation, and as in duty bound, he will ever pray etc., etc.,

Stones Stone
Solicitors for Complainant.

FOOT NOTE:-The Defendant, Fannie Beard 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.

Stones Stone
Solicitors for Complainant.

ncs.

8594 AFFIDAVIT OF NON-RESIDENCE. FOR SALE BY GEO. D. BARNARD & CO., ST. LOUIS. S

Andrew W. White, Complainant.

Complainant

vs.

Fannie Beard White, Defendant.

Defendant

IN EQUITY,
CIRCUIT COURT OF
Baldwin COUNTY.

THE STATE OF ALABAMA,
Baldwin County.

Personally appeared before me, T/ W. Richerson Register of said Court, in and for said County and State,

Norborne Stone, one of the attorneys for the complainant and agent for the complainant.

~~agent of Complainant~~, who being duly sworn, deposes and says that he is informed and verily believes that Fannie Beard White

the Defendant in the above stated cause is a non-resident of the State of Alabama, ~~and the address of Defendant cannot be ascertained after reasonable effort~~, residing, when last heard from, at Cuthbert, in the state of Georgia, her more particular address is unknown and cannot be ascertained after diligent inquiry.

and that said Defendant is, in belief of affiant, over twenty-one years of age.

Norborne Stone

Sworn to and subscribed before me, this 21st day of May 1919.

T W Richerson
Register.

No. -174-

AFFIDAVIT OF NON-RESIDENCE.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Andrew W. White, Complainant.

vs.

Fannie Beard White, Defendant.

Filed in office 21st day of May 19 19.

D W Reclusse

Register.

97

8601 **Motion for Decree Pro Confesso on Publication.**

THE STATE OF ALABAMA,
Baldwin *County.*

CIRCUIT COURT, IN EQUITY.
No. 174 June *Term, 19*19.

Andrew W White *Complainant*

vs.

Jannie Beard White *Defendant*

Motion is hereby made for a Decree Pro Confesso against
Jannie Beard White *Defendant*
in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This —14— *day of* —July— *19*19

Slaton & Slaton
*Solicitor.*S

746 Code.

No. 174 Page

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Andrew White

Complainants.

vs.

Jannie Beard White

Defendants.

MOTION FOR DECREE PRO CONFESSO ON PUBLICATION.

Filed July 14 1919

D W Reilman

Register.

~~Recorded in Record,~~

Vol. Page

D W Reilman

Register.

R F

X

8606 DECREE PRO CONFESSO ~~OF~~ ON PUBLICATION. Baldwin Times Print.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
No. 174 Fall Term, 1919

Andrew W. White Complainant

vs. Fannie Beard White Defendant

In this cause it appears to the Register J W Richerson that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 22 day of May, 1919, in the Baldwin Times a newspaper published in Baldwin Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 22 day day of May 1919 and a copy mailed to Fannie Beard White at Cuthbert, Ga

And it now further appearing to the Register J W Richerson, that the said Fannie Beard White the defendant

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant —, ordered and decreed by the Register J W Richerson that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Fannie Beard White

This 14 day of July, 1919

J W Richerson
Register.

No. 174 Page

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY

Andrew W White
Compl't

vs.

Fannie Beard
White,
Deft

DECREE PRO CONFESSO ON PUBLICATION.

Issued July 14. 1919
T W Richmond
Register.

Recorded in Record

Vol. Page .

Register.

8581 NOTE OF TESTIMONY.

Andrew W. White,
Complainant.

vs.

Fannie Beard White,
Respondent.

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 Andrew W. White and W. L. Wainwright.

and in behalf of Defendant upon in ----

T. V. Richmond
Register

5 —

No. 174

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Andrew W. White,

vs.

Fannie Beard White.

NOTE OF TESTIMONY.

Filed in Open Court this 21

day of July 1919.

D. W. Richmond

Register

X

8550 REQUEST FOR DECREE IN VACATION.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 174 Fall Term, 191

Andrew W. White, Complainant

vs.

Fannie Beard White. Defendant

To Hon. 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 & 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. -174- Page

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

Andrew W. White,

vs.

Fannie Beard White.

REQUEST FOR DECREE IN
VACATION.

Filed July 21st, 1919. 191

D. W. Simmons
Register

Recorded in Record

Vol. Page

Register

8564 APPLICATION FOR ORAL EXAMINATION. FOR SALE BY GEO. D. BARNARD & CO., ST. LOUIS. S

THE STATE OF ALABAMA,
Baldwin *County.* } *CIRCUIT COURT, IN EQUITY.*

Andrew W. White, *Complainant*
vs.
Fannie Beard White, *Defendant*
} *No.* 174

Now comes the Complainant *by* Stone & Stone *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* es., *who reside within the State of Alabama:*

NAME OF WITNESS.	*RESIDENCE OF WITNESS.*
Andrew W. White, Complainant	265 St. Joseph St, Mobile, Ala.
W. L. Wainwright	Perdido Station, Ala.

And they *suggests the name of* T. W. Richerson, Register *who resides at* Bay Minette, Ala. *as a suitable person to be appointed Commissioner to take the testimony of said witness.*

This 16th *day of* July *19*19

Stone & Stone

Solicitor for Complainant.

The Applicant for said Oral Examination is hereby required to give in writing 10 *days notice thereof, before the examination is taken, to the adverse party, or to* her *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.*

T W Richerson

Register.

No. -174-

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL EXAMINATION.

Andrew W. White,

vs.

Fannie Beard White,

Filed in office this 16th day of July 1919

D M Richmond

Register.

Largest Weekly Circulation in South Alabama

Bay Minette, Ala., June 14th, 1919

M

Andrew W. White, Complainant
vs
Fannie Beard White, Defendant

NOTICE TO NON-RESIDENT
Stone & Stone,
Attys for Complainant

THE BALDWIN TIMES

ABNER J. SMITH, PROPR.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES. LOCAL AND LONG DISTANCE TELEPHONE

All Bills Must Be Paid Within 30 Days

To publishing above Notice to Non-Resident in The Baldwin Times in issues of May 22nd to June 12th, 1919:
207 words @ 4½ ¢ per word..... $9.31

Abner J. Smith

OFFICIAL ORGAN FOR PUBLICATION OF ALL COUNTY ADVERTISING

CIRCULATION GUARANTEED TO BE THE LARGEST IN BALDWIN COUNTY

THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

SUBSCRIPTION: $1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE NO. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

Notice to Non-Residents.

Andrew W. White, Complainant, vs. Fannie Beard White, Defendant. No. 174.

The State of Alabama, Baldwin County. In Equity. Circuit Court of Baldwin County.

In this cause it being made to appear to the Judge of this Court, in Term time, by the affidavit of N. C. Stone, one of the Attorneys for the Complainant and agent of Complainant, that the Defendant Fannie Beard White, is a non-resident of the State of Alabama and when last heard from resided at Cuthbert, Ga., her more particular address being unknown and cannot be ascertained after diligent enquiry and further, that in the belief of said affiant the Defendant is over the age of 21 years; it is therefore ordered that publication be made in the Baldwin Times, a newspaper published in Baldwin County, Alabama, once a week for four consecutive weeks, requiring that the said Fannie Beard White to answer or demur to the Bill of Complaint in this cause by the 22nd day of June, 1919, or after thirty days therefrom a decree Pro Confesso may may be taken against her.

This 21st day of May, 1919.

T. W. Richerson,

Register of the Circuit Court of Baldwin County, Ala.

Stone and Stone,

Attorneys for Complainant.

14-4t

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Andrew W. White, Complainant

vs

Fannie Beard White, Defendant

No. 174

Circuit Court of Baldwin County, in Equity.

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication	May 22nd, 1919	Vol. 30	No. 14
" " second "	May 29th, 1919	Vol. 30	No. 15
" " third "	June 5th, 1919	Vol. 30	No. 16
" " fourth "	June 12th, 1919	Vol. 30	No. 17

Subscribed and sworn to before the undersigned

this 17 day of June 1917.

T W Richerson
Clerk Circuit Court

Abner J. Smith
Publisher.

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.

Andrew W. White Complainant

vs.

Fannie Beard White Defendant

Oral examination before the Register of the following witnesses:

W. L. Wainwright and Andrew W. White, witnesses for the complainant.

who reside in Alabama, said examination being conducted in Bay Minette Alabama, on this the 19th day of July, and there being present

T. W. Richerson, Register in Chancery and Norborne Stone, one of the Solicitors for the complainant

The said witnesses being first sworn to speak the truth, the whole truth and nothing but the truth, testified as follows: —W. L. Wainwright.—

My name is W. L. Wainwright. I am a resident of Baldwin County, Alabama, living near Perdido, where I have lived all my life.

I know both Andrew W. White and his wife, Fannie Beard White. I have known Andrew W. White for the past fourteen years and his wife for the past six years. Both of them are over the age of twenty one years

I know that they lived to-gether as man and wife in this county during the year 1914. I know that Fannie Beard White voluntarily abandoned and deserted Andrew W. White during the month of January, 1915. She has never returned to live with him since that time. I know of no cause she had to leave him as she did.

By said marriage there was born one child by the name of Ornett White. This little girl is now about five years old and lives at Perdido, Baldwin County, Alabama, and is in my care for its father.

I do not consider the mother of this child, a fit and proper person to have its custody, care, control or manage the education of it. She

Fannie Beard White is a woman whose character and morals are about as bad as they can be. She is not the proper person to have this child.

I consider Andrew W. White a proper and fit person to have the custody and control of this child and to provide for its education and support. At present it is at ~~his~~ my home in Perdido and is cared for by my wife and is properly cared for. ~~thxxfxthxxxprxxidxxx~~

I do not know the whereabouts of Fannie Beard White.

W. L. Wainwright

TESTIMONY OF ANDREW W. WHITE.

My name is ~~Andrew~~ Andrew W. White. I am over the age of twenty-one years and a resident of Baldwin County, State of Alabama, altho at present I am engaged in work at the Shipyards in Mobile, Alabama. My wife, Fannie Beard White is over the age of twenty one years. She is a non-resident of the State of Alabama and when last heard from she was in Cuthbert, Georgia.

We were married in April, 1914 at Milton, Florida and lived together as man and wife until about January, 1915. At tjis time she voluntarily deserted and bandoned me without just cause. She has never returned to live with me since that time. I gave her no xause to leave me as she did.

There was born to us one child, a girl named Ornett. This child is now about 5 years old and is in the home of W. L. Wainwright in Perdido, Baldwin County, Alabama, while I am working in Mobile. The mother of this child is not a proper or fit perhan to have the custody pf controlof this child, for she is a woman of the worst morals.

I do not know the whereabouts of my wife now. When last heard from she was in Cuthbert, Georgia. She deserted me for more than ~~three~~ two years before this bill was filed. I have been a resident of Baldwin County for three years next immediately preceeding the filing of this bill of conplaint.

I believe that I am a fit and proper person to have the custody of my child and I am amply able to provide for it as it should be provided for.

A. W. White

Andrew W. White

I, D.W. Richerson, as Register

hereby certify that the foregoing deposition S. on oral examination were 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 me, 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 es.; 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 ..... day of ....., 19.....

.....(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. _____ Page _____

The State of Alabama,

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Andrew W White

vs. Complainant,

Fannie Beard White

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of Andrew W White W. L. Wainwright

for Complainant

Filed 19 day of July, 19 1 5

Published by order of the Court, _____

day of _____, 19____

_____ Register.

MARSHALL & BRUCE CO., NASHVILLE

8558 DECREE OF DIVORCE. Baldwin Times Print.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

No. -174- CIRCUIT COURT, IN EQUITY.

Andrew W. White, Complainant

vs.

Fannie Beard White, 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 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 Andrew W. White is forever divorced from the said Fannie Beard White for and on account of voluntary desertion and abandonment for over two years as alleged in said Bill of Complaint;

It is further ordered, that the said Andrew W. 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 Andrew W. 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 Andrew W. White

It is further ordered, adjudged and decreed that said Andrew W. White shall not again marry except to said Fannie Beard 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 Fannie Beard White during the pendency of said appeal.

This 21st day of July 1919.

A E Gaither

Judge of the Circuit Court of Baldwin County.

No. -174-

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Andrew W. White,

Complainant.

vs.

Fannie Beard White,

Defendant.

DECREE OF DIVORCE.

Filed in office this 21st

day of July 1919

Register.

E. O. M.

Recorded on Minutes

Andrew W White, Complainant. : In the Circuit Court,

vs : Equity Side, State of Alabama,

Fannie Beard White, Defendant.: Baldwin County. No.174.

To the Honorable, The Circuit Court of Baldwin County, Equity side, and the Hon.A.E.Gamble, Judge Thereof, in Equity Sitting:-

Your Orator, Andrew W White, brings this, his original bill of complaint for divorce againnst Fannie Beard White and respectfully represents and shows unto your Honor and unto this Honorable Court as follows:-

" FIRST".

That he is a bonafide resident of Baldwin County, State of Alabama, residing at Perdido . That he has been such resident for more than three years next immediately preceding the filing of this bill of complaint. That he is over the age of twenty-one years.

That the defendant, Fannie Beard White, is over the age of twenty-one years, is a non-resident of the State of Alabama, and when last heard from resided in Cuthbert in the State of Georgia,

" Second ."

That Orator and the said Fannie Beard White were married at Milton, Florida, on to-wit: April 15th, 1914, and lived together as man and wife until to-wit, January 1st, 1915, .

" THIRD."

That on to wit January 1st, 1915, the said Fannie Beard White voluntarily deserted and abandoned your Orator, without just cause or legal excuse, and has so continuously abandoned and deserted your Orator since that time,.

" FOURTH."

That there was born to Defendant and Orator by said marriage one female child named Ornett White 4 years old who is now residing with Orator at this home near Perdido. That the defendant Fannie Beard White is not a fit or proper person to have the care, custody and control of said female child, nor is she able to care for, maintain, educate and support such child. That your Orator is a fit and proper person to have the custody and control of said child and is amply able to maintain and educate her.

PRAYER FOR PROCESS.

THE PREMISES CONSIDERED. Orator prays that such orders and decrees be made and issued necessary to make the said Fannie Beard White a party respondent to this original bill of complaint, requiring her to appear and plead, answer or demur to the same within the time re uired 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 matrimony heretofore existing between the Orator Andrew W White, and Defendant, Fannie Beard White, be forever dissolved; that your Honor will grant unto Orator the care, custody and control of said female child, Ornett White; and that your Honor will allow Orator to again contract the marriage relation, and as in duty bound, he will ever pray etc., etc.,

Stone and Stone
Solicitors for Complainant.

FOOTNOTE:- The Defendant Fannie Beard 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.

Stone and Stone.
Solicitors for Complainant.

COPY.

ANDREW W WHITE, COMPLAINANT.

V.S

FANNIE BEARD WHITE?DEFENDANT

RETURN RECEIPT.

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

(Signature or name of addressee.)

(Signature of addressee's agent.)

Date of delivery, ----------, *191*

Form 3811 **05—6116**

Post Office Department

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

Postmark of Delivering Office

and Date of Delivery.

REGISTERED ARTICLE No. 2038.

INSURED PARCEL No. _____

Return to T. W. Richerson.
(Name of sender.)

Street and Number, or Post Office Box, _____

Post Office at Bay Minette

State Ala.

c 5—6116

Post Office Department

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

MAY 12
5 P.M.
CA.

F. W. Richerson,

Bay Minette

Ala.

c 5—2598

REQUEST FOR BETTER ADDRESS

United States Post Office

Cuthbert Ga, 5/12/19
(POST OFFICE AND STATE) (DATE)

Registered

A letter bearing your name as sender and addressed to Fannie Beard
Cuthbert Ga.
remains undelivered in this post office because insufficiently addressed.
We have no one that gets
mail from this Office by this name

If possible, please supply a better address in the space provided below, and return this card in a sealed envelope, postage prepaid.

Respectfully, POSTMASTER.
J. Flam

The above-mentioned letter was intended for

Form B-22. c 5—2598 c