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SIMON FIELDS,

Complainant,

-vs.-

MAGGIE FIELDS,

Respondent.  
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IN THE CIRCUIT COURT

OF

BALDWIN COUNTY, ALABAMA.--IN EQUITY.

TO THE HONORABLE A. E. GAMBLE, JUDGE OF SAID COURT:

Your orator, Simon Fields, a resident of Baldwin County, Alabama, respectfully shows unto your Honor that he is over the age of twenty-one years, that on or about July 25, 1915 he intermarried with Respondent, Maggie Fields, nee Maggie Smiley, that they lived together as man and wife for more than five months, most of the time residing in Baldwin County, Alabama, that said Maggie Fields is over the age of twenty-one years, and that your orator has been a bona fide resident of Baldwin County, Alabama, for more than three years.

That on or about December 27, 1915, or more than two years ago, the said Maggie Fields voluntarily abandoned your orator's bed and board, and has since that time continuously remained away. Your orator states that the said Maggie Fields is now a resident of Bragg, Lowndes County, Alabama; and he charges her with voluntary abandonment.

The premises considered, orator prays for a subpoena, directed to the said Maggie Fields, directing her to answer, plead, or demur to the charge herein made against her, under the rules of this Court, within the time allowed by law; that she, the said Maggie Fields, be made a party respondent to this bill; that upon a final hearing of the evidence your Honor will order, adjudge, and decree that the bonds of matrimony heretofore existing between your orator and the said Maggie Fields be forever dissolved; and that your Honor will decree such other, further, and general relief as may in equity and good conscience be due your orator in the premises. And your orator will ever pray, etc.

*J. Hamilton Smith*  
Solicitor for Complainant.

FOOTNOTE: The respondent is required to answer each section and paragraph of this bill, but oath thereto is hereby expressly waived.

*J. Hamilton Smith, Solicitor for Complainant.*



Original Bill

Filed 5/6/1919  
T. W. Richardson  
Register

676-1919.  
\$ 2.00 deposited on Cost.

RECEIVED  
IN THE OFFICE OF THE  
CLERK OF THE SUPREME COURT

County of ...

...



THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Simon Fields - Complainant

vs.

Maggie Fields Defendant

Oral examination before the Register of the following witnesses:

Simon Fields Savage Horace

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, on this the 6th, day of September 1919., and there being present

J.H. Smith,

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

Simon Fields, testified as follows: My name is Simon Fields, I am a resident of Baldwin County, Alabama, and over the age of 21 years, in Baldwin Co, Ala. Maggie Fields and I were married/ on or about July 25th, 1915, and lived together as man and wife for more than five months, most of the time residing in Baldwin County, Alabama,

Maggie Fields is over the age of 21 years, I have been a bonafide resident of Baldwin County, Ala, for more than three years/ (next) preceding the filing of this bill.

On or about December 27th, 1915, or more than 2 years before the filing of this bill Maggie Fields voluntarily abandoned my bed and board and has since that time continuously remained away, from me. she left me without any cause on my part.

Simon Fields

Savage Horace, testified as follows: My name is Savage Horace, I am over 21 years of age, and a resident of Baldwin Co, Ala,



I know Simon Fields and Maggie Fields, and know that they were married over four years ago and lived together as man and wife in Baldwin Co, Ala, for about five months, Maggie Fields voluntarily abandoned Simon Fields, more that 2 years next before the filing of this Bill, and has continuously remained away from him for more than 2 years before the filing of this bill.

I lived next door to them while they were living together as man and wife and know that he was good provider and that she left him without just cause on his part.

*Seymour Harace*

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**The State of Alabama,**

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

**IN CIRCUIT COURT, IN EQUITY.**

*Simon Preece*

vs. Complainant,

*Maggie Preece*

Defendant.

**Deposition Taken Before Register on Oral Examination.**

Deposition of *Complainant* ✓

*W. H. Turner*

Filed *6* day of *Sept*, 19*17*

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

day of \_\_\_\_\_, 19\_\_\_\_

*W. H. Turner*

Register.

Simon Fields,

vs.

Maggie Fields

THE STATE OF ALABAMA,

Baldwin COUNTY.

CIRCUIT COURT OF

Baldwin COUNTY,

IN EQUITY.

Register

In this cause it being made to appear to the Court that a Summons was served upon the Defendant.....

Maggie Fields

by the Sheriff of Baldwin County, on the 13th day of

June 19....., requiring to appear and plead, answer or demur to the

Bill of Complaint in his cause within thirty days from the service of said Summons, and the said Defendant.....

having failed to plead, answer or demur to the said Bill to the date hereof. It is now, therefore, on motion of

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 Maggie Fields,

Defendant aforesaid.

This 11th day of August 1919..

D. W. Rice  
Register & Judge of the Circuit Court of  
Baldwin County.



No. ....

IN EQUITY.

CIRCUIT COURT OF

*Baldwin* COUNTY,

*Simon Fielder*

vs.

*Maggie Fielder*

DECREE OF PRO CONFESSO.

Filed in office this *11* day of

*Aug* 19*12*.

*D W Riccannon*  
Register.

E. O. M. ....





RETURNED FOR COMPLAINT.

"next preceding the filing of this bill."  
years, the following words:

has been a bona fide resident of Baldwin County, Alabama, for more than three  
years by inserting therein in bold and underlined type the words "also  
the Court leave to stand his  
comes the complaint in the above entitled cause and sets on

*Filed 7/1 1919  
J. W. Richardson  
Register*

Respondent:

IN DEBTOR'S

BALDWIN COUNTY, ALABAMA.

OR

IN THE CIRCUIT COURT

Complainant:

SIMON WINDS,



Simon Fields,

vs.

Maggie Fields,

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, .....  
and deposition of Complainant and ~~Savage~~ Horace,

and in behalf of Defendant upon.....

*F. W. Johnson*

Register



No. 175.

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THE STATE OF ALABAMA,  
BALDWIN COUNTY

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IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

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Simon Fields,

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vs.

Maggie Fields,

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NOTE OF TESTIMONY.

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Filed in Open Court this 9th  
day of Sept 1919

*D W Register*

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Register

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THE STATE OF ALABAMA,  
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. .... Fall ..... Term, 191... 9.

Simon Fields

Complainant.....

vs.

Maggie Fields,

Defendant.....

To ..... T. W. Richerson,

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 ..... Maggie Fields,

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.

..... J. Hamilton Smith

Solicitor for Complainant.

No. 175.

Page .....

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

Simon Fields,

vs.

Maggie Fields,

REQUEST FOR DECREE IN  
VACATION.

Filed Sept 9th 1919.

*W. H. ...*

Register

Recorded in ..... Record

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

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 Maggie Fields,

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

Simon Fields,

against said

Maggie Fields,

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 5th, day of June,

1919.



Register.

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



*original*  
ALIAS.

Serve on Maggie Fields,  
Stockton, Ala.

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

No. 175.

SUMMONS.

Simon Fields,

vs.

Maggie Fields.

Hon. Hamilton Smith.

Solicitor for Complainant.

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this 5

day of June 1919

O. B. Peterson  
Sheriff.

Executed this June 13 day of

1919

by leaving a copy of the within Summons with

Maggie Fields  
Defendant

O. B. Peterson  
Sheriff

By \_\_\_\_\_  
Deputy Sheriff.



THE STATE OF ALABAMA,

Baldwin

County.

CIRCUIT COURT, IN EQUITY.

Simon Fields

Complainant.....

vs.

No.....

Maggie Fields

Defendant.....

Now comes the Complainant by J. Hamilton Smith,

Solicitor of Record, and makes application to the Register of said Court to ~~issue a Commission~~ to take the testimony in said cause, <sup>or</sup> for oral examination, of the following named witness~~es~~, who reside within the State of Alabama:

NAME OF WITNESS.

RESIDENCE OF WITNESS.

Simon Fields,

stockton

Savage Horace,

"

--And-- suggests the name of

who resides at as a suitable person to be appointed Commissioner to take the testimony of said witness

This 6th day of Sept 19 19

J. Hamilton Smith

Solicitor for Complainant.

No.....

THE STATE OF ALABAMA,

.....County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL  
EXAMINATION.

vs.

Filed in office this 6

day of Sept 1918

T. W. Rainey  
Register.



STEVENS, M<sup>C</sup>CORVEY & M<sup>C</sup>LEOD  
ATTORNEYS AT LAW  
503-7 CITY BANK BUILDING  
MOBILE, ALA.

THOMAS M. STEVENS.  
GESSNER T. M<sup>C</sup>CORVEY.  
WILLIAM M<sup>C</sup>LEOD.  
DAVID B. GOODE.

May 5, 1919.

Hon. T. W. Richerson, Circuit Clerk,

Bay Minette, Alabama.

Dear Mr. Tom:-

I am enclosing to you bill of divorce for Simon Fields, a Stockton negro. His wife, who abandoned him several years ago, is now living at Bragg, Lowndes County, Alabama; and I am, therefore, asking that the subpoena be issued to the Sheriff of Lowndes County.

I don't know what the cost of serving the summons will be, but I am depositing with you a P. O. Money Order for \$2.00. Let me know what the cost is, and I will promptly send the necessary additional amount.

Very truly yours,

*Hamilton Smith.*

JHS-S.



P. C. HERBERT  
SHERIFF  
Lowndes County, Alabama

HAYNEVILLE, ALA.,

May 20, 1919.

Wm O. B. Richardson  
Byrminette Ala

Dear Sir:-

I made return on  
the enclosed paper thinking  
she was served by my deputy  
H. H. Tige who does my work down  
in that part of My County  
but after I mailed you the orig  
he writes me that the woman  
has left the County

Enclosed letter which will  
explain its self

Your friend  
P. C. Herbert



Simon Fields.  
Complainant,  
Vs.

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

Maggie Fields,  
Respondent.

Comes the Complainant in the above entitled cause and begs of the court leave to amend his bill of complaint heretofore filed in this cause by insetting therein in red ink immediately after the averment, " orator has been a bona fide resident of Baldwin County, Alabama, for more than three years" the following words:

"#next preceeding the filing of this bill. "

J. Hamilton Smith.  
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 Maggie Fields,

of Baldwin county, 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 <sup>An Amended</sup> Bill of Complaint lately exhibited by

Simon Fields

against said Maggie Fields

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 1st day of July

1919

*T. W. Richerson*

Register.

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



*Original*

Serve on.....

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

No.....

SUMMONS.

**Simon Fields**

vs.

**Maggie Fields.**

*J. H. Jewett*

Solicitor for Complainant.

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

*serve copy on Maggie  
Fields, Rockton, Ala.*

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this.....

day of ..... 191.....

Sheriff.

Executed this..... day of

191.....

by leaving a copy of the within Summons with

Defendant

Sheriff

By .....

Deputy Sheriff.

*Deft*



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.....Maggie Fields,.....

of Lowndes 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.....

Simon Fields,

against said .....

Maggie Fields,

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 6th, day of May,

191 9.

*T. W. Richerson*

Register.

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



Original

Serve on Maggie Fields, Braggs, Ala.

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

No. ....

SUMMONS.

Simon Fields,

vs.

Maggie Fields,

J. Hamilton, Smith,

Solicitor for Complainant.

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this .....

day of ..... 191.....

Sheriff.

Executed this 13<sup>th</sup> day of

May 1919

by leaving a copy of the within Summons with

Maggie Fields

Defendant

P. C. Hulbert

Sheriff

By H. H. Till

Deputy Sheriff.

Special



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 Maggie Fields,

of Lowndes 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

Simon Fields,

against said

Maggie Fields,

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 6th, day of May,

9.  
191

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 Maggie Fields, Braggs, Ala.

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

No. ....

SUMMONS.

Simon Fields,

vs.

Maggie Fields,

J. Hamilton, Smith,

Solicitor for Complainant.

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this .....

day of ..... 191.....

Sheriff.

Executed this ..... day of

191.....

by leaving a copy of the within Summons with

Defendant

Sheriff

By .....

Deputy Sheriff.

THE STATE OF ALABAMA,

Baldwin County.

No. .... CIRCUIT COURT IN EQUITY.

Simon Fields Complainant

vs.

Maggie Fields Defendant

Motion is hereby made for a Decree Pro Confesso against

Maggie Fields 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.....ha..... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This ~~15th~~ 11th day of August, 19 19.

J. Hamilton Smith.

Solicitor.



No. .... Page .....

THE STATE OF ALABAMA,

*Baldwin* County,

CIRCUIT COURT, IN EQUITY.

*Simon Fields*

vs.

*Maggie Fields*

MOTION FOR DECREE  
PRO CONFESSO ON  
PERSONAL SERVICE.

Filed *Aug 11* 191*8*

*T. W. Richardson*  
Register.

Recorded in ..... Record

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

Register.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

No. 175, ..... CIRCUIT COURT, IN EQUITY.

Simon Fields, ..... Complainant.....

vs.

Maggie Fields, ..... 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.....

Simon Fields, ..... is forever divorced from the said

Maggie Fields, ..... for and on account of

Voluntary abandonment;

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

It is further ordered, that the said Simon Fields, and Maggie Fields be, and ~~they~~ <sup>are</sup> hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Simon Fields, 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 Maggie Fields,

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

This 20<sup>th</sup> day of September, 1919.

*W. H. Grubb*

Judge of the Circuit Court of Baldwin County.



No. 175.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.  
BALDWIN COUNTY, ALA.

Simon Fields,

vs.

Maggie Fields,

DECREE OF DIVORCE.

Filed in office this

22<sup>nd</sup>

day of

September

1919.

*D. W. Richardson*

Register.

E. O. M.

*Decree entered on Minutes.*