

777

State OF ALABAMA, )  
BALDWIN COUNTY. )

IN THE CIRCUIT COURT,  
IN EQUITY.

TO THE HONORABLE A. E. GAMBLE, JUDGE OF THE CIRCUIT COURT,  
BALDWIN COUNTY, ALABAMA, ---IN EQUITY.

Your Orator, Roland Rice, respectfully represents and shows unto Your Honor as follows:

FIRST.

That he is a bona fide resident citizen of the County of Baldwin and State of Alabama, residing at Tensaw, Alabama. That he has been a resident of the State of Alabama for a period of more than the last three preceeding years next before the filing of this bill, and that he is over the age of twenty-one years.

That Virginia Rice is over the age of twenty-one years and is a ~~non~~-resident of the State of Alabama, residing at Latham, Baldwin County, Alabama.

SECOND.

That your Orator and Virginia Rice were married in Baldwin County, Alabama, about twenty years ago; that the said Virginia Rice voluntarily abandoned your Orator more than two years ago and has not lived with him since.

PRAYER FOR PROCESS.

The premises considered, your Orator respectfully prays that the said Virginia Rice, defendant, be made party respondent to this bill of complaint by the usual process of this Honorable Court, and that she be required to demur, plead to or answer the same within the time and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause your Honor will grant unto Orator an absolute divorce from the said Virginia Rice; that your Orator will be again allowed to con-

tract marriage; that if your Orator is mistaken in the relief prayed that your Honor will grant unto him such other, further, different and general relief as he may in justice and Equity he may be entitled.

PAGE & MOORER.

Solicitors for Complainant.

FOOT NOTE;

The defendant, Virginia Rice, is required to answer each and every allegation of the foregoing bill of complaint, numbered from First to Second, both inclusive, but not under oath, answer under oath being hereby expressly waived.

PAGE & MOORER.

Solicitors 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 Virginia Rice

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

Roland Rice,

against said Virginia Rice,

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 May

1919



Register.

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

*Original*

*Copy*  
Serve on Virginia Rice.

*Sutton Ave*

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY.

No. ....

SUMMONS.

Roland Rice.

vs.

Virginia Rice.

Page and Moorer.

Solicitor for Complainant.

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this 31st

day of May 1919.

Sheriff.

Executed this ~~31st~~ 20th day of

August 1919

by leaving a copy of the within Summons with

Virginia Rice

Defendant

WR Stuart

Sheriff

By

B. Dejean  
Deputy Sheriff.

*Returned for  
Alien Aug 17/1919  
WR Stuart*

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

No. 177. CIRCUIT COURT, IN EQUITY.

Roland Rice,

Complainant

vs.

Virginia Rice,

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and evidences of 2 witnesses,

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

Roland Rice,

is forever divorced from the said

Virginia Rice,

for and on account of

Abandonment,

as alleged in said Bill of Complaint;

It is further ordered, that the said Roland Rice, 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 Roland Rice, 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 Virginia Rice,

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

This 29<sup>th</sup> day of October,

1919  
*A. E. Gamble*  
Judge of the Circuit Court of Baldwin County.

No. 177.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.  
BALDWIN COUNTY, ALA.

Roland Rice

vs.

Virginia Rice.

DECREE OF DIVORCE.

Filed in office this

30<sup>th</sup>

day of

October

1919.

J. M. Richardson

Register.

E. O. M.

Recorded on  
minutes

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

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

..... *Roland Rice* ..... Complainant.....

vs.

..... *Virginia Rice* ..... Defendant.....

To *J. W. Ricumson* ....., 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 *Deft* .....

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.

..... *Page and Moorser,* .....  
Solicitor for Complainant.

No. 177

Page .....

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

*Roland Rice*

vs.

*Virginia Rice*

REQUEST FOR DECREE IN  
VACATION.

Filed Oct 27<sup>th</sup> 1917

*J. M. McIlwain*

Register

Recorded in ..... Record

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

Register



*Roland Rice*

vs.

*Virginia Rice*

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,

*Deceit Procurement.*

*And evidence of 2 Witnesses*

and in behalf of Defendant upon

*J. W. Williams*

Register

No. 177

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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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*Roland Rice*

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vs.

*Virginia Rice*

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NOTE OF TESTIMONY.

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Filed in Open Court this 27

day of Oct 1919

*D. M. Whitemore*

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Register

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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 Virginia Rice.

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

Roland Rice

against said

Virginia Rice

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 AUG

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. 177.

SUMMONS.

Roland Rice

vs.

Virginia Rice.

Page and Moorer.

Solicitor for Complainant.

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

Received in office this *5<sup>th</sup>*

day of *Aug* 191*9*

*W R Stewart*  
Sheriff.

Executed this *20<sup>th</sup>* day of

*Aug* 191*9*

by leaving a copy of the within Summons with

*Virginia Rice*

Defendant

*W R Stewart*

Sheriff

By *B. Higgins*

Deputy Sheriff.

Roland Rice

vs.

Virginia Rice

THE STATE OF ALABAMA,

Barclay COUNTY.

CIRCUIT COURT OF

Barclay COUNTY,

IN EQUITY.

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

Virginia Rice

by the Sheriff of Barclay County, on the 20<sup>th</sup> day of

August 1919, requiring her 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 Virginia Rice

Defendant.....aforesaid.

This 27 day of Oct 1919

J. W. McClunson  
 Register of the Circuit Court of  
 Barclay County.

No. 177

IN EQUITY.

CIRCUIT COURT OF

Baldwin COUNTY,

Roland Rice

vs.

Virginia Rice

DECREE OF PRO CONFESSO.

Filed in office this 27 day of

Oct 1919

J. M. McInnis

Register.

E. O. M.

THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Roland Rice, Complainant

vs.

Virginia Rice, Defendant

Oral examination before the Register of the following witnesses:

Roland Rice, and Andye Leatherwood,

who reside in Alabama, said examination being conducted in Bay Minette, Alabama, on this the 27th day of October, 1919, and there being present

H.D. Coorer,

Roland Rice,

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

and have been a resident of Baldwin County all my life,

My name is Roland Rice the Complainant in this cause/ Virginia Rice the Respondent is over the age of twenty-one years and resides near Latham Baldwin County, Alabama, myself and Virginia Rice were married in Baldwin County, Alabama, about twenty years before the filing of this bill, she abandoned me more than two years ago before the filing of this bill, and has not lived with me since. Virginia Rice abandoned me without any cause on my part.

Roland Rice

Andya Leatherwood Testified As follows:

My name is Andya Leatherwood  
And am over 21 <sup>age</sup> years of age I know Roland Rice and Virginia Rice they were married in Baldwin County Alabama <sup>about 20 years ago</sup> and lived together as man & wife until about 8 years ago before the filing of this bill.

She abandoned Roland Rice without any cause on his part.

Roland Rice was kind to her and provided well for her.

Roland Rice and Virginia Rice are both residents of Baldwin County, Ala and have been for 3 years before the filing of this bill.

Both are over the age of 21 years.

Andya Leatherwood



I, D. W. Reimann, as Register  
 hereby certify that the foregoing deposition <sup>s</sup> on oral examination was taken down by me in writing  
 in the words of the witness u 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....., 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 27 day of Oct, 1919  
D. W. Reimann (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 |    |

**The State of Alabama,**

----- Baldwin ----- COUNTY.

**IN CIRCUIT COURT, IN EQUITY.**

----- Roland Rice -----

vs. Complainant,

----- Virginia Rice, -----

Defendant.

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

Deposition of Roland Rice and Andy Leather  
WOOD.  
~~complainant~~

for Complainant,

Filed 27 day of Oct, 1919.

Published by order of the Court, -----

day of -----, 19---

Register.