

-----X  
 MARY RAY PETTY,  
 Complainant. )  
 )  
 -VS- )  
 )  
 THOMAS TRAMMELL PETTY,  
 Defendant. )  
 -----X

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA  
BALDWIN COUNTY

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

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

Your complainant, Mary Ray Petty, exhibits this, her original  
bill of complaint against Thomas Trammell Petty and respectfully re-  
presents and shows unto your Honor and unto this Honorable Court as fol-  
lows, to-wit;

FIRST.

That your complainant is a bona fide resident of the State of  
Alabama, residing in Bay Minette, Baldwin County, where she has resided  
continuously for three years next immediately preceeding the filing of  
this, her bill of complaint. That Thomas Trammell Petty is over the age  
of twenty-one years, is a non-resident of the State of Alabama, and re-  
sides in Pensacola, Florida, and that his address is c/o G. F. & A. R.  
R. Co., Pensacola, Florida.

SECOND.

That your complainant and the said defendant, Thomas Trammell  
Petty were married at Bay Minette, Baldwin County, State of Alabama,  
on to-wit; October 15th, 1916 and they lived to-gether as man and wife  
u ntil to-wit; May 1st, 1917.

THIRD.

That on, to-wit, May 1st, 1917, the said Thomas Trammell Petty  
voluntarily deserted and abandoned your complainant, without just cause  
or legal excuse. That said desertion and abandonment took place more  
than two years before the filing of this bill of complaint. That said  
desertion and abandonment has been continuous since that date.

PRAYER FOR PROCESS AND RELIEF.

The premises considered, complainant prays that your Honor will  
make such orders and decrees and cause a subpoena to be issued that will  
make the said Thomas Trammell Petty party respondent to this bill of  
complaint, requiring him to appear and plead, answer or demur, to this  
bill, within the time required by law, under the pains and penalties of  
this honorable court.

That upon a final hearing of this cause that your Honor will  
render, adjudge and decree that the bonds of matrimony heretofore ex-  
isting between Mary Ray Petty and Thomas Trammell Petty be dissolved;  
that your complainant be given the right to again contract the marriage  
relation; and such other and further or further and different relief  
may be granted to your complainant as to your Honor will seem meet and  
proper. And as in duty bound, she will ever pray, etc., etc.

*[Handwritten Signature]*  
Solicitors for Complainant

FOOT NOTE:-The Defendant, Thomas Trammell Petty is required to answer  
each and every paragraph of the foregoing bill of complaint, from "FIRST  
to THIRD", both inclusive, but not under oath, answer under oath being  
hereby expressly waived.

*[Handwritten Signature]*  
Solicitors for Complainant.



*Roy*  
MARY ~~ESTER~~ PETTY,  
Complainant.

IN THE CIRCUIT COURT-EQUITY SIDE  
STATE OF ALABAMA  
BALDWIN COUNTY

-vs-

THOMAS TRAMMELL PETTY,  
Defendant.

Comes the defendant, Thomas Trammell Petty, in the above styled cause, and files this, his answer to the original bill of complaint in this cause filed and for answer thereto says;

FIRST.

The defendant denies each and every paragraph of the foregoing bill of complaint and demands strict proof thereof.

*Thomas Trammell Petty*  
Defendant

The defendant waives all further notice of taking of testimony and consents that this cause be submitted in vacation.

*Thomas Trammell Petty*  
Defendant.

Sworn to and subscribed before me,  
this August 15th, 1919.

*Notborne Stone*  
Notary Public-Baldwin Co-Alabama.





2nd

ANSWER OF DEFENDANT AND WAIVER  
OF FURTHER NOTICE AND CONSENT  
FOR SUBMISSION IN VACATION.

Mary Ray Petty,  
Complainant.

-vs-

Thomas Trammell Petty,  
Defendant.

Circuit Court-Equity Side.  
State of Alabama.  
Baldwin County.

Filed in this office this  
August 18th, 1919.

*J. W. Richardson*

REGISTER.





THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Mary Roy Petty

Complainant.....

vs.

No. 186

Thomas Francis Petty

Defendant.....

Now comes the Complainant by Stuart & Stuart

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.

Mary Roy Petty, Compt

Bay Minneter, Ala.

Mrs. G. J. Ray

00

00

00

And they suggests the name of Samuel Richardson who resides at Bay Minneter, as a suitable person to be appointed Commissioner to take the testimony of said witness.....

This 18 day of August 1919

Stuart & Stuart

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.

Notice by Compt has been waived by Dept

T. W. Richardson

Register.



3.

No. 186

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

APPLICATION FOR ORAL  
EXAMINATION.

Mary Kay Pitts  
Plaintiff

vs.

John Thomas Pitts  
Defendant

Filed in office this

18

day of

May

1919

J. W. [Signature]  
Register.

*[Faint vertical handwriting, possibly bleed-through from the reverse side]*

*[Faint vertical handwriting, possibly bleed-through from the reverse side]*

*[Faint vertical handwriting, possibly bleed-through from the reverse side]*

Mary Ray Petty  
Complainant

THE STATE OF ALABAMA,  
BALDWIN COUNTY

vs.

Thomas Wammes Petty  
Defendant

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,

answer and waiver of Debt and  
testimony of Mary Ray Petty and  
Mrs G. J. Ray

and in behalf of Defendant upon

answer

J. W. Richardson

Register



3rd  
No. 186,

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Mary Roy Petty  
Complainant

vs.

Thomas Bennett Petty  
Defendant

NOTE OF TESTIMONY.

Filed in Open Court this 19

day of Aug 1919

T. H. Richardson

Register



THE STATE OF ALABAMA, Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY.

May Ray Petty Complainant vs.

Thomas Trammell Petty. Defendant

Oral examination before the Register of the following witnesses:

Mary Ray Petty, the complainant, and Mrs. G. F. Ray, a witness for the complainant.

who reside in Alabama, said examination being conducted in Bay Minette Alabama, on this the 19th day of August, and there being present myself and attorneys for the complainant.

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

Testimony of Mary Ray Petty.

My name is Mary Ray Petty. I am the complainant in a certain divorce cause now pending in the Circuit Court of Baldwin County, State of Alabama, wherein Thomas Trammell Petty is the defendant.

I reside in Bay Minette, Baldwin County, Alabama. I have lived in Baldwin County, Alabama, continuously all of my life. I have lived here for three years next immediately preceeding the filing of my divorce suit.

Thomas Trammell Petty is over the age of twenty one years. He is a non-resident of the state of Alabama, and resides in the City of Pensacola, State of Florida, care of G. F. & A. R. R.,

Thomas Trammell Petty and myself were married at Bay Minette, Baldwin County, Alabama on October 14th, 1916. We lived together until about May 1st, 1917. On or about May 1st, 1917, Thomas Trammell Petty voluntarily abandoned and deserted me. He has never returned to live with me since that time. This was for more than two years before I filed my suit for divorce. He left without any just cause or legal excuse.



He has never returned to live with me since that time.

*Mary Ray Petty*

TESTIMONY OF MRS. G. F. RAY,  
a witness for the complainant

My name is Mrs. G. F. Ray. I know both Thomas Trammell Petty and Mary Ray Petty. I have known Mary Ray Petty all of her life. I have known Thomas Petty for about eight years or more. Mary Ray Petty is a resident of Bay Minette, Baldwin County, Alabama. She has lived in Baldwin County All of her life. She has lived there continuously.

Thomas Petty is over the age of twenty one years. He is a non-resident of the State of Alabama. He resided somewhere in Pensacola the last time I hearf of him.

I remember when Mary Ray Petty and Thomas Petty were married. They were married on the 14th day of October, 1916. I was present at the wedding.

They lived together as man and wife until about the last of April or the first of May 1917. Thomas Petty left her at this time. He has never returned to live with her since that time. This was over two years before she filed her bill for divorce.

I know of kae no just cause or legal excuse she gave him to leave her as he did.

*Mrs. G. F. Ray.*



I, T. W. Ricimmon, as Register

hereby certify that the foregoing deposition S on oral examination was taken down by me in writing in the words of the witness a 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 a, or had proof made before me of the identity of said witness a; 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 19th day of Aug, 1919  
T. W. Ricimmon (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.

Mary Roy Petty

vs. Complainant,

Thomas Francis Petty

Defendant.

Deposition Taken Before Register on Oral Examination.

Deposition of Mary Roy Petty  
Mrs. G. F. Roy  
for Complainant

Filed 19 day of Aug, 1919

Published by order of the Court,

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

T. W. Rimmer

Register.



THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 186 Jace Term, 191.....

Mary Ray Petty

Complainant.....

vs.

Thomas Trammell Petty

Defendant.....

To How J. W. Richardson Register:

In the above stated cause, ~~a Decree Pro Confesso~~ <sup>the Defendant having waived notice and consented</sup> 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 How & 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.

How & Stone  
Solicitor for Complainant.

for submission in vacatur



No. 186 Page 4th

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

*Mary Roy Petty*  
*Complainant*

vs.

*Thomas Francis Petty*  
*Defendant*

REQUEST FOR DECREE IN  
VACATION.

Filed August 19 1919

*D. B. Richardson*  
Register

Recorded in ..... Record

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

Register



THE STATE OF ALABAMA,  
BALDWIN COUNTY.

No. -186- ..... CIRCUIT COURT, IN EQUITY.

Mary Ray Petty ..... Complainant.....

vs.

Thomas Trammell Petty ..... Defendant.....

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, ~~deceit pro confesso~~  
~~answer and waiver of defendant and~~ .....  
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.....

Mary Ray Petty ..... is forever divorced from the said

Thomas Trammell Petty ..... for and on account of

voluntary desertion and abandonment as alleged in said bill of com-  
plaint.....

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

It is further ordered, that the said ..... Mary Ray Petty

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 ..... Mary Ray Petty

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 ..... Mary Ray Petty

It is further ordered, adjudged and decreed that said ..... Mary Ray Petty

shall not again marry except to said ..... Thomas Trammell Petty

until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except  
to said ..... Thomas Trammell Petty ..... during the pendency of said appeal.

This 22<sup>nd</sup> day of August

1919

*W. G. Double*

Judge of the Circuit Court of Baldwin County.



No. <sup>7</sup> 186,

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.  
BALDWIN COUNTY, ALA.

Mary Ray Petty  
Complainant

vs.

Thomas Maxwell Petty  
Defendant

DECREE OF DIVORCE.

Filed in office this 23rd

day of August 1919

T. W. Williamson  
Register.

E. O. M.

Recorded  
in minutes