

STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. \_\_\_\_\_ Term, 1939

SUSIE PRICE \_\_\_\_\_, Complainant

Vs.

ABRAM PRICE \_\_\_\_\_, Defendant

To R. S. DUCK \_\_\_\_\_, 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 Beebe, Hall & Beebe,

\_\_\_\_\_ 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.

Beebe Hall Beebe

Solicitor for Complainant.

SUSIE PRICE,

Complainant,

VS.

ABRAM A. PRICE,

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,  
and Testimony of Susie Price and William Price

and in behalf of Defendant upon Decree Pro Confesso

*R. L. Duch*

Register.

*By - Mullis Sherrin  
Deputy*

539

The State of Alabama,  
Baldwin County.

No. \_\_\_\_\_ CIRCUIT COURT IN EQUITY.

SUSIE PRICE \_\_\_\_\_ Complainant

vs.

ABRAM PRICE \_\_\_\_\_ Defendant

In this cause it appears to the Register

that a summons requiring the Defendant

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 Defendant

was served upon him by the Sheriff of Baldwin County, Alabama, on the  
30 day of May 1939.

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 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 Defendant

Defendant aforesaid.

This 3rd day of July 1939.

By R. S. Decker Register.  
By Justice Thompson  
Deputy

SUSIE PRICE,  
Complainant,  
VS.  
ABRAM A. PRICE,  
Respondent.

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

This cause coming on to be heard was submitted upon the original Bill of Complaint, Decree Pro Confesso and Testimony as noted by the Register, and the Court, after due consideration, is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of voluntary abandonment.

IT IS FURTHER ORDERED that the Complainant be and she is hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED that the Complainant pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said SUSIE PRICE shall not again marry, except to the said ABRAM PRICE, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said ABRAM PRICE, during the pendency of the appeal.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant, SUSIE PRICE, have the custody, care and control of the minor children, namely: Clarence Price, Lucille Price and Harvey Price.

Dated at Monroeville, Monroe County, Alabama, this 24 day of July, 1939.

J. W. Stone  
Judge of the Circuit Court of Baldwin  
County, Alabama.

SUSIE PRICE,  
Complainant,  
VS.  
ABRAM A. PRICE,  
Respondent.

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

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,  
IN EQUITY:

Comes your Complainant, SUSIE PRICE, and humbly complaining against the Respondent, ABRAM A. PRICE, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That your Complainant and the Respondent are both over twenty-one years of age and residents of Baldwin County, Alabama, and have been for more than three years next preceding the filing of this Bill of Complaint.

2. That your Complainant and the Respondent were married at Robertsdale, in Baldwin County, Alabama, on March 27th, 1910, and lived together as husband and wife, in Baldwin County, Alabama, until on to-wit, November 1st, 1932.

3. That on to-wit, November 1st, 1932, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4. That there was born to said marriage several children, three of which are still minors, to-wit: Clarence Price, Lucille Price and Harvey Price, who are now and have been all their lives living with your Complainant, their mother; that your Complainant has cared and provided for said children all their lives and is still ready, able and willing to provide for them; that the Respondent is not a suitable or fit person to have the care, custody and control of said children.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said ABRAM A. PRICE party respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same, within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of this cause, your Honor will give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent, ABRAM A. PRICE; that your Honor will enter a further order and decree awarding to her the care, custody and control of the said minor children; Clarence Price, Lucile Price and Harvey Price; that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Richard Lee Beebe  
Solicitors for Complainant.

FOOT NOTE:

The Respondent, ABRAM A. PRICE, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 4, inclusive, but not under oath, oath being hereby expressly waived.

Richard Lee Beebe  
Solicitors for Complainant.

The State of Alabama, {  
Baldwin County

CIRCUIT COURT

To O'BYRNE JONES:

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Susie Price and William Price

as witnesses in behalf of Complainant, in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

SUSIE PRICE,

is Complainant

and ABRAM PRICE

is Defendant,

on oath to be by you administered, upon them to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 3rd day of July 19 39

COMMISSIONER'S FEE, \$

WITNESS' FEES, \$

R.S. Durb REGISTER  
By: Mullica Thompson Deputy

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon ABRAM A. PRICE

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

SUSTE PRICE

against said ABRAM A. PRICE

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, R. S. Duck, Register of said Circuit Court, this 13th day of

April, 1939.

**R. S. DUCK**

clerk, register

, Register

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



The State of Alabama }  
Baldwin County

Circuit Court of Baldwin County, Alabama,  
(In Equity)

SUSIE PRICE,

COMPLAINANT

VS.

ABRAM A. PRICE

RESPONDENT

I, O'BYRNE JONES

as ~~Register~~ and Commissioner

have called and caused to come before me Susie Price and William Price

witnesses named in the Requirement for Oral Examination, on the 3rd day of July

19 39, at the office of Beebe, Hall & Beebe,

in Bay Minette, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Susie Price

doth depose and say as follows:

My name is Susie Price. I live at Robertsdale, in Baldwin County, Alabama. I am over twenty-one years of age. The Respondent is over twenty-one years of age and livest at Robertsdale or Summerdale, in Baldwin County, Alabama. We have both been living in Baldwin County, Alabama, for more than three years next preceding the filing of this bill of complaint.

Abram A. Price, the Respondent, and I were married at Robertsdale, in Baldwin County, Alabama, on March 27th, 1910. We lived together as husband and wife, in Baldwin County, Alabama, until November 1st, 1932; that the Respondent, Abram A. Price, voluntarily left me on November 1st, 1932, and has remained away voluntarily and continuously since that time; that he has contributed nothing toward the support of me and my children since going away. I have been called upon to support myself and children.

We have three children, all minors: Clarence Price, Lucille Price, and Harvey Price, who are now and have been all their lives living with me. I have been called upon to care and provide for them all their lives and especially since the Respondent left me, in 1932.

Susie Price

WILLIAM PRICE, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is William Price. I live at Robertsdale, in Baldwin County, Alabama. I am the son of your Complainant, Susie Price.

I lived with my mother all my life until last July, when I married, and now live about two miles from her and am in her home from one to three or four times each week. I know of my own personal knowledge that in 1932 my father, Abram A. Price, went away voluntarily and that he has remained away voluntarily and continuously since that time. Since he went away, my father has contributed nothing

ORAL EXAMINATION

I, O'BYRNE JONES, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition s. on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and Hubert M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of 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 any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 3rd day of July 1939.

O'Byrne Jones (L. S.)  
Commissioner

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

The State of Alabama  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

SUSIE PRICE,

COMPLAINANT

vs.

ABRAHAM PRICE

RESPONDENT

ORAL DEPOSITION

Filed July 3, 1939

R.S. Davis, Register

RECORDED IN

Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register

RECORDED

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

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

SUSIE PRICE,

Complainant,

vs.

ABRAM A. PRICE,

Respondent.

**NOTE OF TESTIMONY**

Filed in Open Court this 3<sup>rd</sup>

day of July 1939

R. S. Dyer  
REGISTER

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

**The State of Alabama,**  
Baldwin County,  
CIRCUIT COURT, IN EQUITY

SUSIE PRICE,

Vs.

ABRAM PRICE

**REQUEST FOR DECREE IN  
VACATION**

Filed July 3, 1938

*R. S. Duch*

Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

RECORDED

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

**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

SUSIE PRICE,

vs.

ABRAM PRICE

**DECREE PRO CONFESSO ON  
PERSONAL SERVICE**

Issued *July 3* 1939

*R. S. Buck*  
Register.

Original

RECORDED

Serve On Abram A. Price  
Hobbs State, Ala.  
Circuit Court of Baldwin County  
IN EQUITY

No. 539

Summons

suate Price,  
Complainant,

vs.

Abram A. Price,  
Respondent.

REEBE HALL & REEBE  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA,  
Baldwin County

Received in office this 13<sup>th</sup>

day of April 1939  
W. S. Stewart  
Sheriff.

Executed this 5-30 day of \_\_\_\_\_, 1939

by leaving a copy of the Summons with

Abram A. Price

Defendant

W. S. Stewart

Sheriff

By Bill Spomer  
Deputy Sheriff

RECORDED

NO

The State of Alabama

BALDWIN COUNTY

CIRCUIT COURT

Complainant

vs.

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

RECORDED

BILL OF COMPLAINT:

SUSIE PRICE,

Complainant,

VS.

ABRAM A. PRICE,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

*Filed April 13, 1939  
R. S. Dorch  
By: Van Alice Thompson, Deputy*



RECORDED

FINAL DECREE OF DIVORCE.

SUSIE PRICE,  
Complainant,  
VS.  
ABRAM PRICE,  
Respondent.

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

*Filed July 7, 1939  
R.S. Duncanson, Register  
By: R.C. Thompson, Deputy*