No. 269

VS.

THOMAS J. CAMPBELL,

RESPONDENT.

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

TO THE HONORABLE JOHN LEIGH, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

THE BILL OF COMPLAINT OF JOSEPHINE CAMPBELL, EXHIBITED AGAINST THOMAS J. CAMPBELL, RESPECTFULLY REPRESENTS AND SHOWS UNTO YOUR HONOR AS FOLLOWS:

- 1 .- That she was married to Thomas J. Campbell at Bon Secour, Alabama, on January 27th., 1907; that they are both bona fide residents of Baldwin County, Alabama, and have been, for more than three years next before the filing of this bill, and are more than twenty-one years, of age.
- 2.- In September, 1917, her said husband voluntarily abandoned her, and such abandonment has continued up to the present time.
- 3 .- There was born of said marriage, one child, Walter Jefferson Campbell, who was five years old on the 25th. of last July, and who has always been in the custody of complainant since her husband abandoned her.

#### PRAYER.

The premises considered, complainant prays that the said Thomas J. Campbell be made party defendant to this bill, and be required to plead, answer, or demur to the same, within the time required by law, and that such process issue and proceedings be had as are in accordance with the rules and practice of this Honorable Court; that she be granted a divorce from the bonds of matrimony, and awarded the custody of her child; that she be granted such other or further relief as she may be entitled to in the premses.

AS SOLICITORS FOR COMPLAINANT.

FOOT NOTE: The respondent is required to answer each of the allegations of the foregoing bill, but not under oath, answer under oath being hereby expressly waived.

AS SOLICITORS FOR/COMPLAINANT.

NO. 269. In Equity.

VS.

THOMAS J. CAMPBELL, RESPONDENT.

In the Circuit Court of Baldwin County, Alabama.

By virtue of the commission hereto annexed, issued from the office of the Clerk of the Circuit Court of Baldwin County, Alabama, I caused to come before me, Josephine Campbell and Ransome Roberson, witnesses named in said commission, on this, the 18th. day of December, 1920, and, having duly cautioned and sworn the said witnesses to speak the truth, the whole truth, and nothing but the truth, they did testify as follows:

#### DEPOSITION OF JOSEPHINE CAMPBELL:

My name is Josephine Campbell, and I am the complainant in this case. I was married to Thomas J. Campbell, of Bon Secour, Alabama, on January 27th., 1907. We have both been bona fide resident citizens of Baldwin County, Alabama, for more than three years before the bill was filed in this case; in fact, all of our lives, and were both more than twenty-one years of age at the time this suit was commenced.

In September, 1917, my husband, Thomas J. Campbell, voluntarily abandoned me, without any cause whatever, and such abandonment has continued ever since. He did not provide for me for some time before the abandonment, and has not contributed to my support, or the support of our child, since he left me. On the 25th. of July, 1915, there was born to us a son, Walter Jefferson Campbell, who has always lived with me and been in my custody since my husband abandoned me, which custody I desire to retain ..

Josephine Campbell.

## DEPOSITION OF RANSOME D. ROBERSON.

My name is Ransome D. Roberson, and I live at Bon Secour, Alabama. I have known Josephine Campbell and Thomas J. Campbell for many years. They are both bona fide residents of Baldwin County, Alabama, and have been since their birth, and were more than twenty-one years of age at the time this bill was filed.

Thomas J. Campbell voluntarily abandoned his wife, in September, 1917, and they have not lived together, nor has he contributed to the support of his family since that time; in fact, he is thriftless, and did not property support his family before such abandonment. Josephine Campbell is a splendid little woman, a dutiful wife, and a good mother, and would be a suitable person to have the rearing of her child, Walter Jefferson Campbell. Her husband would not.

Ransom & Roberson

CERTIFICATE.

I, B.F.Patterson, Commissioner in said commission named, do hereby certify that Josephine Campbell and Ransom Roberson, appeared before me, at Bon Secour, Alabama, at the time set forth in the caption, and, after being first duly sworn, testified as hereinbefore set out, and subscribed the same in my presence, after it has first been read over to them; that I havepersonal knowledge of the identity of said witnesses, and am not of counsel nor of kin to any of the parties to said cause, or in any manner interested in the result thereof.

Given under my hand and seal, on this, the 18th. day of December, 1920.

COMMISSIONER.

The State of Alabama, Clerk. Plaintiff Defendant SET CIRCUIT COURT, COMMISSION TO TAKE DEPOSITION ON INTERROGATORIES. Josephine Campbell WITNESSES Baldwin No. Thomas

## DIRECTIONS:

# TO THE COMMISSIONERS IN EXECUTING AND RETURNING THE COMMISSION.

- 1. If the time and place of executing the commission are not named therein, the Commissioners will subpoena the witness to appear before them at such time and place as they may appoint, and administer the oath to witness.
- 2. Either the Commissioners, witness, or some impartial persons, must reduce the answer of witness to writing, as near as may be in the language of the witness.
  - 3. State the caption of the cause at the beginning, and then the following heading or title:

By virtue of the Commission hereto annexed, issued from the office of the Clerk of the Circuit Court of\_\_\_ County, State of Alabama, we, the Commissioners therein named, have called and caused to come before us the said A B, the witness named in said commission, on this\_\_\_\_day of\_\_\_\_\_191\_, at the\_\_\_\_; and having duly cautioned and sworn the said witness to speak the truth, the whole truth, and nothing but the truth, A B, the said witness, deposeth

First .- To first interrogatory he saith: Second .- To second interrogatory he saith: First.—To first cross-interrogatory he saith:

4. When the deposition is finished, it must be subscribed by the witness and certified as follows:

We, C D and E F, the Commissioners in said commission named, do hereby certify that the foregoing testimony and answers, taken down and written by us in the words of the witness, A B, were read over to him; that he assented, swore to, and subscribed the same in our presence, at the time and place herein mentioned; that we have personal knowledge of the personal identity of said witness [or, if unacquainted with the witness, that proof hath been made before us of the identity of the said witness]; that we are not of counsel or kin to either of the parties to said cause, nor interested in the event thereof. And we inclose the said testimony, together with said commission and the interrogatories, direct and cross, to the said Clerk of the Circuit Court whence the same emanated, as our full execution of said commission.

Given under our hands and seals, this\_\_\_\_day of\_\_\_\_\_191\_\_ ----[L. S.]

Next unite the commissions, interrogatories, and answers together, with wafers or tape; second, envelope all, sealed with three seals; third, write each Commissioner's name across each seal; and, fourth, write on the envelope the names of the parties and witnesses, and direct it thus:

> CD v. EF Esq., DEPOSITION OF A B County, Ala.

VS.

THOMAS J. CAMPBELL, RESPONDENT.

NO. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

STATE OF ALABAMA, ) COUNTY OF MOBILE. )

Before me, L. C. Harris, a Notary Public in and for the State and County aforesaid, personally appeared James H. Webb, who, being by me first duly sworn, deposes and says that he is of counsel for Josephine C. Campbell, complainant in the above entitled cause, and, on information and belief, states that the defendant, Thomas J. Campbell, is not in the military or naval forces of the United States, but is engaged in civil pursuits in Baldwin County, Alabama.

Sworn to and subscribed before me, this 10th. day of December, 1920.

L. C. Harris,
Notary Public, Mobile County, Alabama.

Decree of Divorce.

The State of Alabama. Baldwin County.

No. 269. Circuit Co rt In Equity.

Josephine Campbell, Complainant.

Thomas J Campbell, 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 id 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 Josephine Campbell, is forever divorced from the said Thomas J

Campbell, for and on accountrof abandonment, as alleged in said Bill of Complaint;

It is further ordered, that the said Josephine Campbell, 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 Josephine Campbell, 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 Thomas J Cam pbell,

It is further ordered, adjudged and decreed that said Josephine Campbell, shall not again marry except to said Thomas J Campbell, until sixty days after this date, and that if an ap eal is taken within sixty days she shall not marry again except to said Thomas J Campbell, during the pendency of said appeal.

This 26th, day of Febuary, 1921. John D Leigh,

Judge of the Circuit Court of Baldwin County. 

The State of Alabama, Baldwin County.

Circuit Court in Equity.

I.T.W. Richerson, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the 26th, day of Febuary, 1921, in the cause of Josephine Campbell vs Thomas J Campbell, as appears of Record in said Court.

Witness my hand and the seal of said Court this 28th, day of Febuary, 1921.

-----Register.

#### LAW OFFICES OF

#### WEBB, MCALPINE & GROVE

JAMES H. WEBB.
JOHN W. MCALPINE
EDWARD J. GROVE

MOBILE, ALABAMA

December 10th.,1920.

Mr. T. W. Richardson,
Bay Minette, Alabama.

Dear Tom:-

Enclosed find request for a decree pro confesso, and military affidavit. After granting this decree, next Monday, please issue commission to B. F. Patterson, to take the depositions of Josephine Campbell and Ransome D. Roberson, witnesses for the complainant in this cause, on oral examination, sending the same to me. As I expect to leave for the West about the 18th., I would be glad to get these papers as soon as possible.

W/H. (Encs.) Yours sincerely,

## 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 Thomas J Campbell,
Da I dand so
of Baldwin County, to be and appear before the Judge of the Circuit Court of Bald-
win 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
Josephine Campbell,
against said
Thomas J Campbell,
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 30th, day of September
192 O •
1) Mecimon
Register.

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

2 holdsigued
Serve on
Circuit Court of Baldwin County In Equity
No
SUMMONS
Josephine Campbell,
vs.
Thomas J Campbell,
Bon Secour
1 3 Olean Miles
Webb Mc Alpine and Grove
Solicitor for Complainant
Rocorded in Vol Page

# THE STATE OF ALABAMA BALDWIN COUNTY

Received in office	e this 30th
day of <u>Septemb</u>	per,1920. 192
	Sheriff
Executed this	6 th day of
	1015 1926
4	Lampbell
90000	
	Defendant
	Sheriff
By WX	Willis .
	Deputy Sheriff

No. 269  Page  THE STATE OF ALABAMA,  County.  CIRCUIT COURT, IN EQUITY.  Deschine Campfeel	
DECREE PRO CONFESSO ON PERSONAL SERVICE.  Issued	
Recorded in	

# The State of Alabama, Mobile County

JOSEPHINE CAMPBELL,

Complainant

Circuit Court of Mobile County

No.

THOMAS J. CAMPBELL,

Defendant

IN EQUITY

The Complainant

requests the oral examination of the following named witnes

on her behalf, viz.:

Josephine Campbell

Ransome D. Roberson

said witnesses reside in the County of Baldwin State of Alabama.

B. F. Patterson

who reside at

suitable person to be appointed Commissioner to take the depositions of said is suggested as witness eson such oral examination

Solicitos for Complai nant,

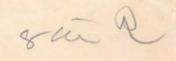
-1-	Thomas .
12-	Tex
0	CERC



	No
Circuit (	Court of Mobile County  Mobile, Alabama  IN EQUITY
*2	A Land
3	4.82
	VS.
	•
Demar	nd for Oral Examination
Filed	Dec 13 1920
1/2	Richmon
	Register

1 4

Josephine Cappful	THE STATE OF ALABAMA, BALDWIN COUNTY
Thomas J. Campfier	IN EQUITY, CIRCUIT COURT OF BALDWIN COUNTY.
This cause is submitted in behalf of Complainant upo Hicker pro Confesso, and Campfeel and Ranso	
and in behalf of Defendant upon	
	M. Register



No. 269

### THE STATE OF ALABAMA, BALDWIN COUNTY

IN EQUITY, CIRCUIT COURT OF BALDWIN COUNTY.
Josephine Campbell
Thomas & Campfeel
NOTE OF TESTIMONY.
Filed in Open Court this 20 cla
day of Stermary 192/
Register

VS.

THOMAS J. CAMPBELL, RESPONDENT.

NO	
2000	Conductive

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

Comes the complainant, and moves for a decree pro confesso against the defendant, he having been personally served more than thirty days prior to this time.

SOLICITORS FOR COMPLAINANT.

# POST OFFICE DEPARTMENT

POST OFFICE,

OFFICIAL BUSINESS (No. 13)

AVOID PAYMENT OF POSTAGE, \$300.

NO.

VS.

THOMAS J. CAMPUELL,

RESPONDENT .

IN THE CIRCUIT COURT OF BALDSIN : COUNTY, ALABAMA. IN EQUITY.

TO THE HONORABLE JOHN LEIGH, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

THE BILL OF COMPLAINT OF JOSEPHINE CAMPBELL, EXHIBITED , AGAINST THOMAS J. CAMPBELL, RESPECTFULLY REPRESENTS AND SHOWS UNTO YOUR HONOR AS FOLLOWS:

- 1 .- That she was married to Thomas J. Campbell at Bon Secour, Alabama, on January 27th., 1907; that they are both bona fide residents of Baldwin County, Alabama, and have been, for more than three years next before the filing of this bill, and are more than twenty-one years, of age.
- 2.- In September, 1917, her said husband voluntarily abandoned her, and such abandonment has continued up to the present time.
- 3.- There was born of said marriage, one child. Walter Jefferson Campbell, who was five years old on the 25th. of last July, and who has always been in the custody of complainant since her husband abandoned her.

#### PRAYER.

The premises considered, complainant prays that the said Thomas J. Campbell be made party defendant to this bill, and be required to plead, answer, or demur to the same, within the time required by law, and that such process issue and proceedings be had as are in accordance with the rules and practice of this Honorable Court; that she be granted a divorce from the bonds of matrimony, and awarded the custody of her child; that she be granted such other or further relief as she may be entitled to in the premses.

> Webb Mc Alpineand Grove AS SOLICITORS FOR COMPLAINANT.

FOOT NOTE: The respondent is required to answer each of the allegations of the foregoing bill, but not under oath, answer under oath being hereby expressly waived.

Webb Mc Alpine and Grove

AS SOLICITORS FOR COMPLAINANT.

NO.

VS.

THOMAS J. CAMPUELL,

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

TO THE HONORABLE JOHN LEIGH, JUDGE OF THE CINCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQUITY:

THE BILL OF CONTAINT OF JOSEPHINE CAMPBELL, EXPIBITED AGAINST THOMAS J. CAMPBELL, RESPECTFULLY REPRESENTS AND SHOWS UNTO

- 1 .- That she was married to Thomas J. Campbell at Bon Secour, Alabama, on January 27th., 1907; that they are both bona fide residents of Baldwin County, Alabama, and have been, for more than three years next before the filing of this bill, and are more than twenty-one years, of age.
- 2.- In September, 1917, her said husband voluntarily abandoned her, and such abandonment has continued up to the present time.
- 3.- There was born of said marriage, one child, Walter Jefferson Campbell, who was five years old on the 25th. of last July, and who has always been in the custody of complainment since her husband abandoned her.

## PRATER.

The premises employed; complainant prays that the said Thomas J. Campbell be made party defendant to this bill, and be required to plead, answer, or demur to the same, within the time required by law, and that such process issue and proceedings be had as are in accordance with the rules and practice of this Hon-orable Court; that she be granted a divorce from the bonds of matrimony, and awarded the custody of her child; that she be granted such other or further relief as she may be entitled to in the premses.

MUST COMPLAINANT.

The respondent is required to answer each of the allegations of the foregoing bill, but not under oath, answer under oath being hereby expressly waived.

Webb m caiping them

LAW OFFICES OF
WEBB, MCALPINE & GROVE
VAN ANTWERP BUILDING
MOBILE, ALABAMA
September 29th., 1920.

Mr. Thomas J. Campbell,
Bon Secour, Alabama.

Dear Sir:-

JAMES H. WEBB.

JOHN W. MCALPINE.

EDWARD J. GROVE.

Your wife has employed us to obtain a divorce for her, and we are enclosing herewith a copy of the bill filed against you. If she had been of a mind to claim it, the law allows her, as a matter of right, temporary alimony, and there is usually also an allowance made for attorneys' fees, and costs of court; and permanent alimony, when the divorce is granted. You will observe, however, that she has asked for none of these things, and you will not be put to any expense in the procuring of the divorce. She informs us that she does not think that you will be opposed to her getting a divorce, as there is no prospect that you will ever live together again. It will save some expense and enable her to get a divorce quicker and be no disadvantage to you, if you will sign the enclosed danger and return them to me. Of course if any resistance is offered, we shall advise her to claim all that she can, and you would be put to considerable expense, even though she did not succeed in getting the divorce, and I will state in this connection, that when temporary alimony was allowed, if you did not comply with the order of court to pay same, and were shown to be able to do so, the Court would treat it as a contempt, and put you in jail until you had complied with the order.

Yours truly,

Webb, McAlpine & Grove,

IN Webb

W/H. (Encs.)

T,

JOSEPHINE CAMPBELL,	NUMBER
COMPLAINANT.	IN THE CIRCUIT COURT OF MOBILE
VS.	COUNTY, ALABAMA. IN EQUITY.
THOMAS J. CAMPBELL, RESPONDENT.	

Now comes the defendant in the above entitled cause, and for answer to the bill of complaint herein, says:

He denies each and every allegation of the same.

DEFENDANT.

STATE OF ALABAMA, COUNTY OF BALDWIN ..

Ι,

in and for the State and County aforesaid, do hereby certify that Thomas J. Campbell, whose name is signed to the foregoing answer, as defendantin the above entitled cause, and who is known to me, acknowledged before me, on this day, that, being informed of the contents of the foregoing answer, he signed the same voluntarily and freely, and without collusion or coercion upon the part of any one whomsoever.

Given under my hand, this, the \_\_\_\_\_ day of 1920.

## 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 Thomas J Campbell,
of Baldwin County, to be and appear before the Judge of the Circuit Court of Bald-
and appear service the stage of the circuit country, to se and appear service the stage of the circuit country,
win 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
Josephine Cambbell,
against said
Thomas J Campbell,
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 and 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 Co. 11. 17043
WITNESS, T. W. Richerson, Register of said Circuit Court, this 30th, day of September
192.
1 M Obelieron
Register.

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

K A	Copy.		
Serve or			
Circuit Court of Baldwin County In Equity			
	No		
	SUMMONS		
	Josephine Campbell,		
A			
	vs.		
	Thomas J Campbell,		
-			
**	Webb Mc Alpine and Grove		
	· Solicitor for Complainant		
Rocord	led in VolPage		

# THE STATE OF ALABAMA BALDWIN COUNTY

Received in office this	30th
lay of Sept mber.1	920 192
	Sheriff
Executed this	
y leaving a copy of the wi	thin summons with
	Sheriff
Зу	Deputy Sheriff



F BALDWIN COUNTY IN EQUITY.

COMPLAINANT.

VS.

. CAMPBELL,

RESPONDENT.

LONS OF JOSEPHINE CAMPBELL AND ME ROBERSON, WITNESSES EXAMINED ON ALF OF COMPLAINANT.



T. W. Richer Bon, 6 / hab fring Richer Bon, 6 / hab fring Gircuit Court,

PERSTABLE

18 11



THE STATE OF ALABAMA, BALDWIN COUNTY.	No. 269.	CIRCUIT COURT, IN EQUITY.
Josephi	ne Campbell,	Complainant
Thomas	J Campbell,	Defendant
This cause, coming on to be heard at this Term, wa	s submitted upon the Bil	of Complaint, decree pro confesso
and testimony as noted by the Register; and, upon considis entitled to the relief prayed for in		
	he	T said bill.
IT IS, THEREFORE, Ordered, adjudged and decreasisting between the Complainant and Defendant be, and		
Josephine Campb		
Thomas J Campbel		
Abandonment,		
······································		
	···	
		s alleged in said Bill of Complaints
It is further ordered, that the said Josephi		
be, andS.he is hereby permitted to again contract ma		
It is further ordered, that the said	osephine Cample	11,
pay the costs herein taxed, for which execution may issue	e, and if such execution	is returned "no property found,"
then execution for such costs may issue against the said	Thomas J Ca	mpbell
It is further ordered, adjudged and decreed that	said Josephine C	amphell
shall not again marry except to said. Thom	as J Campbell,	
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 J Campbel	1, du	ring the pendency of said appeal.
This 26th day of February	John 1921	A Leigh
	Juage or the	Circuit Court of Baldwin County.

No. 269.
THE STATE OF ALABAMA, BALDWIN COUNTY.
CIRCUIT COURT IN EQUITY. BALDWIN COUNTY, ALA.
Josephine Campbell,
vs.
Thomas J Campbell,  DECREE OF DIVORCE.
Filed in office this 28 lls  day of February 197/
Register.  E. O. M.

RECORDED