8558 DECREE OF DIVORCE. 279 Baldwin Times Print.

The State of Alabama, Baldwin County.

No. 274 CIRCUIT COURT, IN EQUITY

Mary Hadley Complainant

vs.

Simon Hadley Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the 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 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 Complainant is forever divorced from the Defendant.

On Account of Cruelty

It is further ordered, that the said Mary Hadley 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 Simon Hadley 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 Hadley

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

This 20th day of August 1921

John D. Liegl
Judge of the Circuit Court of Baldwin County.

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

I, ... 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 ..... day of ..... 192....., in the cause of

..... Complainant

vs.

..... Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the ..... day of ..... 192.....

Register.

No. 274

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY.
BALDWIN COUNTY, ALA.

Mary Hadley

Vs.

Simon Hadley

DECREE OF DIVORCE.

Filed in office this 22nd.

day of August, 1921

D. M. Redmon

Register.

E. O. M.

RECORDED

- - - - - - - - - - - -x
MARY HADLEY,)
Complainant.)
)
-vs-)
)
SIMON HADLEY,)
Defendant.)
- - - - - - - - - - - -x

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

No._____

TO THE HONORABLE, THE CIRCUIT COURT-EQUITY SIDE, BALDWIN COUNTY, ALABAMA, AND THE HON. JOHN D. LEIGH, JUDGE THEREOF, SITTING IN EQUITY:-

Comes your complainant, Mary Hadley, and respectfully exhibits this her bill of complaint for divorce against Simon Hadley and for grounds thereof respectfully shows unto this honorable court as follows:-

F I R S T .

That both the complainant and the defendant are bona fide residents of Baldwin County, Alabama, where they have lived all their lives; that they are both over the age of twenty-one years.

S E C O N D .

That the complainant and defendant were duly and legally married on, to-wit; during the month of June., 1906, and lived to-gether as man and wife up to a short time ago when defendant, by his actions toward your complainant compelled complainant to leave their home and to seek shelter with her father, Thomas Foster.

T H I R D .

That a few months ago complainant was compelled to leave the home of the defendant; the defendant struck her, slapped her in the face, cursed and abused her; drew a gun on her and threatened to kill her; that he has committed actual violence on her person, attended with danger to life or health of the complainant and that from his conduct there is reasonable apprehension on the part of the complainant of a continuance of such acts; that because of such acts she left him as above alleged.

PRAYER FOR PROCESS.

The premises considered, complainant prays that your honor will issue or cause to be issued such orders and decrees as are necessary to make the said defendant, Simon Haldey, party respondent to this bill, requiring him to appear and plead, answer or demur to the same within the time required by law, under the paiss and penalties of this honorable court.

PRAYER FOR RELIEF.

That upon a final hearing of this cause , complainant prays that

that your honor will rendera,adjudge and decree that the bonds of matrimony heretofore existing between the complainant and the defendant be forever dissolved and that your complainant be again permitted to contract the marriage relation if she so desires, and, as in duty bound, she will ever pray, etc.,

STONE & STONE.

Solictors for complainant.

FOOT NOTE:-

The defendant, Simon Haldey, is required to answer each and every paragraph of the foregoing bill from "FIRST" to THIRD", both inclusive, but not under oath, answer under oath being hereby expressly waived.

STONE & STONE.

Solicitors for complainant.

MARY HADLEY,

Complainant. Circuit court-in Equtiy

-vs-

Simon Haldy, Defendant.

Comes the defendant, Simon Hadley and files this his answer to the complaint filed in this cause.

FIRST;

The defendant denies each and every paragraph contained in said bill and demands proof thereof stictly.

his
Simon X Hadley
mark
Defendant.

Defendant waives further notice of the taking of any orders, testimony or submission for final decree.

his
Simon X Hadley
mark
Defendant.

STATE OF ALABAMA.

BALDWIN COUNTY.

I, J. A. Shiver, a ~~Notary Public~~ J. P. in and for said state and county, hereby certify that Simon Haddey, whose name is signed to the foregoing answer and waiver and who is known to me, acknowledged before me on this day that, being informed of the contents of the same, he signed the same voluntarily on the day the same bears date.

Given under my hand this Dec. 28., 1920.

J. A. Shiver
~~Notary Public~~ J. P., Baldwin County, Alabama.

8550 REQUEST FOR DECREE IN VACATION.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. 279. Vacation Term, 1921

Mary Hadley Complainant

vs.

Simon Hadley Defendant

To Hon. J. W. Rickerson, Register:

In the above stated cause a Decree Pro Confesso having been taking 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 Complaiant, by Stone & 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.

Stone & Stone
Solicitors for Complainant.

4

No. 279 Page

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

Mary Hadley

vs.

Simon Hadley

REQUEST FOR DECREE IN
VACATION.

Filed August 13 1921

T. B. Richerson
Register

RECORDED

Recorded in Record

Vol. Page

Register

8587 SUMMONS—Original. Baldwin Times Print.

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 Simon Hadley,

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

Mary Hadley,

against said

Simon Hadley,

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 15th, day of December 192.

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.....

Circuit Court of Baldwin County
In Equity

No.....

SUMMONS

Mary Hadley

vs.

Simon Hadley.

Stone and Stone.
Solicitor for Complainant

Rocorded in Vol..... Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this.....
day of.....192...

.....
Sheriff

Executed this.....day of
.....192....
by leaving a copy of the within summons with

.....
Defendant

.....
Sheriff

By.....
Deputy Sheriff

8587 SUMMONS—Original. Baldwin Times Print.

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 Simon Hadley,

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 Mary Hadley,

against said Simon Hadley,

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 15th, day of December 1920.

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

Mary Hadley

vs.

Simon Hadley.

Stone and Stone.

Solicitor for Complainant

Rocorded in Vol..... Page.....

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this.....

day of.....192...

.....
Sheriff

Executed this.....day of

.....192....

by leaving a copy of the within summons with

.....

.....
Defendant

.....
Sheriff

By.....
Deputy Sheriff

8587 SUMMONS—Original. Baldwin Times Print.

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

Simon Hadley

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

Mary Hadley

against said Simon Hadley

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 December 1920.

T W Richerson

Register.

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

Serve on SIMON HADLEY

Circuit Court of Baldwin County
In Equity

No.

SUMMONS

Mary Hadley

vs.

Simon Hadley

STONE & STONE
Solicitor for Complainant

Rocorded in Vol. Page

RECORDED

2nd

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this

day of 192

Sheriff

Executed this day of

192

by leaving a copy of the within summons with

Defendant

Sheriff

By

Deputy Sheriff

I hereby accept service of this summons and waive further notice of taking testimony, submission of cause or other steps.

WITNESSES:-

Defendant.

DEPOSITION TAKEN BEFORE REGISTER ON INTERROGATORIES, Code 3150. (Box 716.) 89602—M. & B. Co., Nashville

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

MARY HADLEY Complainant

vs.

SIMON HADLEY Defendant

Deposition of Luke Hadley, witness for complainant.

By virtue of the appointment to take the Deposition, indorsed in writing, on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County, I, ..., Register of said Court of said County, have called and caused to come before me .....

the witness ..... named in the Interrogatories, and having first sworn the said witness ..... to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

LUKE HADLEY, a witness for the complainant, testified as follows:-

My name is Luke Hadley, I am a resident of Baldwin County, Alabama, living at Lottie, about one mile from the residence of Simon Hadley. I have lived in this county all my life. I am 32 years of age.

I know both Mary Hadley, the complainant in this cause and her husband, Simon Hadley, the defendant. They are both residents of Baldwin County, Alabama. where Simon Hadley has lived all his life and now resides here. Mary Hadley is a resident of this county also and has lived here all of her life to the best of my knowledge with the exception of a little while when she lived just across the line in FLORIDA. They are both over twenty one years of age.

I remeber when Mary Simon Hadley were married the last day of June fourteen years ago this last June. That is, in June, 1906. I was present at the wedding. They lived to-gether as man and wife until about last fall.

I have seen Simon Hadley abuse and cruelly treat his wife. I was present when he ran her away from their home. On this occasion he cursed her, took a shot gun in his hands, which he said was loaded

with buckshot, and threatened to shoot her. I was standing in their home talking to Mary Hadley when Simon Hadley came up with a shot gun in his hands and told me to stand aside that he had come a long way to kill that God-Damned thing (meaning his wife) I started toward him, telling him not to do this and then he stopped me with the gun. He threatened to kill her and made her leave their home.

On other occasions I have sen him threaten to strike his wife. On these other occasions he threatened to strike her with his fists.

Luke Hadley

I, D M Richerson, the said Register, hereby certify that the foregoing testimony was taken down in writing by myself in the words of the witness, and were read over to him, that ~~the~~ he assented, swore to and subscribed the same in my presence, the 13th day of August, 1971, at Bayminette, Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and 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.

And I enclose the deposition, together with the Interrogatories, Direct and Cross, and the documents which were deposed to, in an envelope properly endorsed and sealed and placed the same on file in my office.

Given under my hand and seal this the 13th day of August, 1971

D M Richerson, Register.

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 ..... $.....

..... days' attendance at $1.50 per day ..... $.....

..... days' attnedance at $1.50 per day ..... $.....

REGISTER'S FEES.

..... days at $1.50 per day ..... $.....

..... words at 20 cents per hundred .....

No. 279 Page

The State of Alabama,

COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Mary Hadley

vs. Complainant,

Simon Hadley

Defendant.

Deposition Taken Before Register on Interrogatories.

Deposition of Witness

for Complainant

Filed 13th day of Aug, 1921

Published by order ~~of the Court~~ Atty for Complainant

Aug 13, 1921

D M Nicrosson

Register.

MARSHALL & BRUCE CO., NASHVILLE

Oral Examination

DEPOSITION TAKEN BEFORE REGISTER ON ~~INTERROGATORIES, Code~~ 3150. (Box 716.) 89602—M. & B. Co., Nashville

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

MARY HADLEY, Complainant

vs.

Simon Haldey, Defendant. Defendant

Deposition of Mary Hadley, compalainant and Mattie Hadley, witnesses for complainant.

By virtue of the appointment to take the ~~Deposition, indorsed in writing, on the Interrogatories by the Solicitor filing the same, in the above stated cause~~ Oral evidence pending in said Court of said County, I, T. W. Rimmer, Register of said Court of said County, have called and caused to come before me Mary Hadley. And Mattie Hadley

the witness~~es~~ named in the Interrogatories, and having first sworn the said witness~~es~~ to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

MARY HADLEY, COMPAINANT AND WITNESS FOR COMPLAINANT:- My name is Mary Hadley and I am the complainant in that certain cause pending in the above court wherein Simon Haldey is the respondent. I am the wife of Simon Hadley. We are both over the age of twenty-one years and are residents of Baldwin County, Alabama, where ~~we have~~ I resided all of ~~our~~ my lives. and I have lived here since I was 15 years old. I and Simon Haley were married in June, 1906 and lived to-gether as man and wife up to a short time before I filed my suit for divorce. I was then treated so badley and cruelly by him that I had to leave his home and go and seek safety with my father, Tom Foster.

Simon Hadley has committed actual violenece on my person attended with danger to life and health. He has struck me on several occasions; has cursed me, abused me and drew a gun on me and threatened to kill me All of this was done in the presence of my oldest daughter, Mattie ~~Hadley~~ Hadley. It was because of these things that I hadto leave him. If I return I know he will mistreat me again and be cruel to me and I am afraid to return to him.

I gave him no cause to so treat me.

her
Mary x Hadley
mark

MATTIE HADLEY, witness for complainant testifies as follows:-

My name is Mattie Hadley and I am nearly thirteen years old.

I am the daughter of Simon and Mary Hadley. I have seen my father, SImon Haddey, curse my mother, senn him hit her, saw him draw a gun on her and said he was going to kill her and for her to get out of the house. He struck her several times. My mother then left home and I and the other children went with her, to my grandpa Foster's.

I never saw my mother give him any excuse for doing her that way . Mary Hadley and Simon Hadley both live in Baldwin County, Ala. We left home because Simon Hadley treated mama like he did.

Martha Hadley
mark

I, D. M. Robinson, the said Register, hereby certify that the foregoing testimony was taken down in writing by myself in the words of the witness, and were read over to him, that they assented, swore to and subscribed the same in my presence, the 5th day of July, 1971, at Baymontt, Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and 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.

And I enclose the deposition, together with the Interrogatories, Direct and Cross, and the documents which were deposed to, in an envelope properly endorsed and sealed and placed the same on file in my office.

Given under my hand and seal this the 5th day of July, 1971

D. M. Robinson, Register.

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 ..... $.....

..... days' attendance at $1.50 per day ..... $.....

..... days' attnedance at $1.50 per day ..... $.....

REGISTER'S FEES.

..... days at $1.50 per day ..... $.....

..... words at 20 cents per hundred .....

No. 279. Page

The State of Alabama,

COUNTY.

IN CIRCUIT COURT, IN EQUITY.

Mary Hadley

vs. Complainant,

Simon Hadley

Defendant.

Deposition Taken Before Register on Interrogatories.

Deposition of Complainant

witness

for Pltf Complainant

Filed 5th day of July, 1921

Published by order of the Court

, 191

P. W. Rieuwon

Register.

MARSHALL & BRUCE CO., NASHVILLE

8581 NOTE OF TESTIMONY.

Mary Hadley

vs.

Simon Hadley

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, Answer of Deft. And testimony of Mary Hadley And Luke Hadley

and in behalf of Defendant upon

T. W. Richmond

Register

5

No. 279.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Mary Hedley

vs.

Luke Hedley

NOTE OF TESTIMONY.

Filed in Open Court this 13th

day of August 1921.

D. M. Meirnon

Register

RECORDED