

The State of Alabama, }
BALDWIN COUNTY.

No. 283 CIRCUIT COURT IN EQUITY.

James Robert Thomley, Complainant...

vs.

Mary Grimes Thomley, Defendant...

Motion is hereby made for a Decree Pro Confesso against

Mary Grimes Thomley, Defendant...

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant.....ha.S.... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 14th day of February, 1921.

James H. Stone

Solicitor.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

James Robert Thomley

Vs.

Mary Grimes Thomley,

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed February 14th, 1921

J. W. Riceman

Register.

Recorded in Record,

Vol. Page

Register.

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 Mary Grimes Thomley

of Mobile, 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

James Robert Thomley

against said

Mary Grimes Thomley,

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 14th day of Dec 1920.



Register.

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

2

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this 24
day of December 1920
W. H. Telcumb
Sheriff

Executed this 31 day of
Dec 1920

by leaving a copy of the within summons with
Mary Grimes Thomley
Defendant

W. H. Telcumb
Sheriff
By W. Burch
Deputy Sheriff

Serve on _____

Circuit Court of Baldwin County
In Equity

No. 283.

SUMMONS

James Robert Thomley

vs.

Mary Grimes Thomley.

Stone and Stone.

Solicitor for Complainant

Recorded in Vol. _____ Page _____

Mary Grimes Thomley

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. Term, 191.....

JAMES ROBERT THOMLEY

Complainant.....

vs.

MARY GRIMES THOMLEY

Defendant.....

T W RICHEYSON

To, 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, bySTONE & 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

Solicitor for Complainant.

No. 283.

Page

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

James Robert Thomey

vs.

Mary Grimes Thomey

REQUEST FOR DECREE IN
VACATION.

Filed Feb 25th 1911

J. W. Rice

Register

Recorded in Record

Vol. Page

Register

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

James Robert Thomley Complainant

vs.

Mary Grimes Thomley. Defendant

Deposition of J.R. Thomley and W.R. Lee,.....

By virtue of the appointment to take the Deposition, indorsed in writing, on ^{oral examination} ~~the Interrogatories by the~~ application for same Solicitor filing ~~the same~~, in the above stated cause pending in said Court of said County, I,

T.W. Richerson,....., Register of said Court of said County, have called and

caused to come before me J.R. Thomley, and W.R. Lee,.....

Application

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:

J.R. Thomley being first duly sworn testified as foows:-

My name is J.R. Thomley, I am over the age of 21 years and am a bonafide resident of Baldwin County Alabama and have been for more than 3 years next immediately preceding the filing of this bill of Complaint.

Mary Grimes Thomley is over the age of 21 years and is a resident of Mobile, Mobile County, Alabama, temporarily.

Mary Grimes Thomley and myself were married at Bay Minette, Baldwin County, Alabama, during the month of December, 1902, and lived together as man and wife until sometime in the month of November 1920.

Mary Grimes Thomley committed adultery with Sidney Gibbon on the 12th day of November 1920, I caught him at my home at night, he was coming out of the back door of my bedroom and my wife was there with him; when they heard me come home they got out the back door, he frequently visited my home when I was off at work, he visited her at night and also in the day time, on this occasion, I run him away and told him to keep away but he continued to come ther during my absence, on one occasion a few days after the time I caught him and my wife on the 12th Nov. 1920 he run me off my own gallery with ~~kn~~ an axe and threatened to kill me if I interferred with him; my wife helped him to hold me down after he knocked me down she told me to get out and go and that she never intended to live with me this was in his presence. She continually kept company with him at all hours day and night and went with all the time. He drove me away from my own home. He had been going with her for some time and after I caught him coming out of my room where my wife was I told him to never come back and she said she was not going to tell him not to return, he could come whenever he wanted to. I never lived with her as a husband after I caught him with her. Both of them jumped on me and beat me up with an axe. He committed adultery with her all right. They lived together when I was not there.

J.R. Thomley

W R Lee being duly sworn testified as follows.

My name is W R Lee. I know James Robert Thomley and Mary Grimes Thomley, both are over the age of 21 years, James Robert Thomley is a resident of Baldwin County, Alabama, and Mary Grimes Thomley is a resident of Mobile County Alabama, they were married at Bay Minette, Baldwin County Alabama, December 1902 I was not present at the wedding but I know they were married and lived together as man and wife, I know nothing about the adultery, James Robert Thomley is a good hard working man I know him well.

W R Lee

I, J. W. Ricumson, 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 them that they assented, swore to and subscribed the same in my presence, the 25th day of February, 1921, 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 25th day of February, 1921
J. W. Ricumson, 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' 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.

James N. Howrey

vs. Complainant,

Mary Guiney Howrey

Defendant.

Deposition Taken Before Register on Interrogatories.

Deposition of Witnesses

for Complainant

Filed 25 day of Feb., 1911

Published by order of the Court _____

_____, 191____

J. W. McInnis

Register.



James Robert Thomley,

vs.

Mary Grimes Thomley,

THE STATE OF ALABAMA,
Baldwin COUNTY.CIRCUIT COURT OF
Baldwin COUNTY,

IN EQUITY.

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

Mary Grimes Thomley,

by the Sheriff of Mobile, County, on the 31st day of

December 19 20, requiring him 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 Mary Grimes Thomley,

Defendant aforesaid.

This 14th day of February 1921.

J. W. Peterson
Register of the Circuit Court of
Baldwin County.

N^o 283

IN EQUITY.

CIRCUIT COURT OF

Baldwin COUNTY,

James Robert Howley

vs.

Mary Emma Howley

DECREE OF PRO CONFESSO.

Filed in office this *14th* day of

February 19*21*

J. W. Riccison
Register.

E. O. M.

JAMES ROBERT THOMLEY) In the Circuit Court of Baldwin County, Ala.
VS) 21st. Judicial Circuit. EQUITY SIDE.
MARY GRIMES THOMLEY)

To The Hon. John D Leigh. Judge of the 21st. Judicial Circuit State of Alabama.

Your Orator JAMES ROBERT THOMLEY, respectfully shows unto Your Honor that he is now and has been for more than three years next immediately preceding the filing of this complaint, a Bona Fide resident of Baldwin County Alabama, and is over the age of twenty one years, and brings this his bill of complaint for divorce against MARY GRIMES THOMLEY, who is over the age of twenty one years and is a resident of Mobile, Mobile County Alabama, at 106 St Anthony Street.

Orator charges.

1st. That he and the said Mary Grimes Thomley were married at Bay Minette Baldwin County Alabama, during the month of December 1902 and lived together as man and wife until sometime in the month of November 1920.

2nd.

That on or about the 12t. day of November 1920 the said Mary Grimes Thomley committed adultery with one Sidney Gibbon, and that since Orator discovered said adultery he has not condoned the offence nor continued to co-habit with his said wife Mary Grimes Thomley.

PRAYER FOR PROCESS

The premises considered Orator prays that Your Honor will cause to be issued the usual process of this Court making said Respondent Mary Grimes Thomley a party to this bill of complaint and commanding her to plead answer or demur to said complaint within the time allowed by law.

Prayer for Relief.

Orator further prays that upon a final hearing of this cause may it please Your Honor to grant to Orator a divorce from the bonds of matrimony from said respondent, and to grant to him such other, or further relief as he may be in Equity and good conscience be entitled.

James Robert Thomley
By *Stoue & Stoue*
Solicitors for Orator.

Foot note.

Respondent is required to answer each and every paragraph of the above bill of complaint from 1 to 2 inclusive but not under oath, and answer under oath is waived.

JAMES ROBERT THOMLEY

By *Stoue & Stoue*
Solicitors

James Robert Thomley

vs.

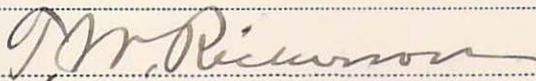
Mary Grimes Thomley.

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,
decree pro confesso and yestimony of J.R.Thomley, and W.R.Lee,

and in behalf of Defendant upon.....



Register

No. 283.

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

James Robert
Thomley

vs.

Mary Grimes Thomley

NOTE OF TESTIMONY.

Filed in Open Court this 25th

day of February 1911

D. W. Riccerson

Register

Thomley

In The Circuit Court of Baldwin County. Ala.

vs

Equity Side.

Thomley

Request for Oral Examination.

Comes the Complainant and asks that The complainant and W R Lee be orally examined in behalf of the Complainant in above cause.

Stoue & Stoue

Attys. for Compl't.

JAMES ROBERT THOMLEY,
Complainant

-vs-

MARY GRIMES THOMLEY,
Defendant.

CIRCUIT COURT-EQUITY SIDE.
STATE OF ALABAMA
BALDWIN COUNTY

Comes the complainant in the above styled cause by his Solici-
tors, Stone & Stone, and dismisses the above couse.

STONE & STONE,

Solicitors for Complainant.

Handwritten notes:
10/10/1909
J. R. Thomley
M. G. Thomley
Stone & Stone