

The State of Alabama, }  
Baldwin County.

No. 298..... CIRCUIT COURT, IN EQUITY

Robert Brown, ..... Complainant.....

vs.

Clara Brown, ..... 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.

*for and account of adultery with James Cravey - The Respondent in this cause shall not again contract marriage without further order from this Court.*

It is further ordered, that the said Robert Brown, be, and..... he 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 Robert Brown, 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 Clara Brown,

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

This 22 day of February, 1921.  
*John D. Leigh*  
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. 298.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY,  
BALDWIN COUNTY, ALA.

Robert Brown,

Vs.

Clara Brown,

DECREE OF DIVORCE.

Filed in office this 23rd

day of February, 1921.

*W. W. Ricusson*

Register.

E. O. M.

RECORDED

*Handwritten notes in left margin:*  
Dated Jan 21st 1921  
The above is a true and correct copy of the original as filed in the office of the Clerk of the Circuit Court in Baldwin County, Alabama, this 23rd day of February, 1921.  
W. W. Ricusson  
Register

*Handwritten notes in center margin:*  
This is a true and correct copy of the original as filed in the office of the Clerk of the Circuit Court in Baldwin County, Alabama, this 23rd day of February, 1921.  
W. W. Ricusson  
Register

*Handwritten notes in right margin:*  
This is a true and correct copy of the original as filed in the office of the Clerk of the Circuit Court in Baldwin County, Alabama, this 23rd day of February, 1921.  
W. W. Ricusson  
Register

BOWD

ALABAMA

FOOT NOTE:

The respondent Clara Brown is required to answer each and every allegation of the foregoing bill of complaint from paragraph numbered 1 to 2 both inclusive, but not under oath, answer under oath being hereby expressly waived.

*Robert Brown*

Complainant

Page & Moorer,  
Solicitors for Complainant.

STATE OF ALABAMA, )  
                          )  
BALDWIN COUNTY. )

IN THE CIRCUIT COURT,  
BALDWIN COUNTY, ALABAMA.  
In Equity.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF CIRCUIT COURT,  
BALDWIN COUNTY, ALABAMA,--In Equity.

Your Orator, Robert Brown, respectfully represents  
and shows unto Your Honor as follows:

1. That he is a bona fide resident citizen of the  
State of Alabama and have resided in Baldwin County for a  
period of more than the last <sup>three,</sup> preceding years next before  
the filing of this bill, residing near Bay Minette, Alabama,  
and that he is over the age of twenty-one years.

That Clara Brown is a resident of Baldwin County,  
Alabama, residing at Dyas, Alabama, and is over the age of  
twenty-one years.

2. That Your Orator and Clara Brown were lawfully mar-  
ried in the month of February, 1914 and lived together as  
man and wife for quite a while at which time the said Clara  
Brown committed the act of adultery and that there was no  
connivance or condonation on the part of your Orator.

PRAYER FOR PROCESS.

The premises considered your Orator prays that the  
said Clara Brown be made party respondent to this bill of  
complaint by the usual process of this Honorable Court and  
that she be required to demur, plead to or answer the same  
within the time and under the penalties as provided by law,  
or that the same be forever confessed.

PRAYER FOR RELIEF.

That upon the final hearing of this cause Your  
Honor will grant unto your Orator an absolute divorce from  
the said Clara Brown.

That if your Orator is mistaken in the relief  
prayed then your Honor will grant unto him such other, fur-  
ther, different and general relief as he may in justice  
and equity be entitled, he will ever pray, etc.

*Robert Brown*  
Complainant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Robert Brown,  
Complainant.

VS .

Clara Brown,  
Defendant.

Answer of Defendant.

Comes Clara Brown and for answer to the Complaint filed in the above styled suit; she admits that she and Complainant were married at the time mentioned in Complaint, but she denies each and every other allegation in said complaint and demands strict proof of same.

She hereby waives service by the sheriff of subpoena on said Bill of complaint, notice of the filing of interrogatories, or any proceeding to take testimony on oral examination, as well as the right to cross examine, and consents that this cause may be submitted for decree on note of testimony made by the Register either in term time or vacation.

Dated at Bay Minette, Alabama, this 15th day of February 1921.

Mrs. Clara Brown  
Defendant.

Abner J. Smith  
Atty for defendant.

Witness, J. W. Rice

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 298. Spring Term, 1921

Robert Brown, Complainant

vs.

Clara Brown, Defendant

To T.W. Richerson, 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 Page and Moorner,

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.

Page and Moorner,  
Solicitor for Complainant.

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No. 298. Page

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

Robert Brown,

vs.

Clara Brown,

REQUEST FOR DECREE IN  
VACATION.

Filed February 21st 1912

*J. W. Riccison*

Register

Recorded in Record

Vol. Page

Register

Robert Brown

THE STATE OF ALABAMA,  
BALDWIN COUNTY

vs.

Clara Brown

IN EQUITY,

CIRCUIT COURT OF BALDWIN COUNTY.

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

Answer of Defendant and testimony of  
Mrs Helen Knight and Robert  
Brown.

and in behalf of Defendant upon

J. W. Ricemson

Register

4th R

No. 298

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Robert Brown

vs.

Blara Brown

NOTE OF TESTIMONY.

Filed in Open Court this 21st

day of February 21 191

J. W. Whinnon

Register

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

Robert Brown Complainant

vs.

Clara Brown, Defendant

Deposition of Mrs. Stella Knight, and Robert Brown,

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,

T.W. Richerson, Register of said Court of said County, have called and  
caused to come before me Mrs. Stella Knight, and Robert Brown

Mrs. Stella Knight,  
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:

My name is Mrs. Stella Knight I am 24 years of age and reside at  
Dyas, in Baldwin County, Alabama, I am well acquainted with the  
Complainant and the defendant, and have known them both about  
15 years, living as a neighbor to them during the time I have  
known them.

I know that the Complainant was in every respect a good  
husband to defendant and provided <sup>well</sup> for her. The defendant  
would often leave her said husband and infant children to go with  
other men. In January, 1919, she left her husband and children and  
went to Mississippi with another man and did not return until in  
October, 1919, at which time the complainant refused to live with her  
longer on account of her adulterous conduct, and they have not lived  
together as man and wife since that date. In July 1920, she gave  
birth to another child. At numerous times before the separation of  
Complainant and defendant and while her husband was off at work defend-  
-ant would have James Cravey and other men of sporty reputations come  
to her house of two small rooms and they would remain for an hour or  
more at a time. On the occasion of such visits from men she would  
put the children out of the house and close the doors. From the evid-  
-dences I have known and seen and in her every day life and gener-  
-al conduct I know that defendant is not a virtuous woman  
and she has been guilty of adultery with said James Cravey and  
other men. Jim Cravey is a married man and visits Clara Brown con-  
-stantly and she puts the children out of doors and closes the  
room so that it will be dark.

Mrs. Stella Knight

Robert Brown, witness for complainant who being duly sworn

testified as follows:

My name is Robert Brown, I am the complainant in this cause, I am 26 years of age I was married to defendant Clara Brown at Dyas, Baldwin County, Alabama, in February, 1912, from said date until October 1919, and have not lived together as man and wife since that date after I had learned that she was living in adultery with one James Cravey, a married man. At said date in Oct 1919, she returned to Baldwin County, Alabama, after being in the State of Mississippi for a period of over nine months, where she went with another man whose name is John Faulk, against my consent.

For the past year or more she has lived alone in a small house of two rooms near Dyas, Alabama, where she was frequently visited during the day and night by said Cravey. For several months last past she has occupied said two rooms house with a man whose name is unknown to me.

Jim Cravey stays with ~~her-also~~ Clara Brown as much or more than one half of his time He is there until late at night and the room is dark.

*Robert Brown*

I, J. W. McCremon, 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 by them that they assented, swore to and subscribed  
And names of H D momey atty for defendant and A J Smith atty for dept  
the same in my presence, the 19th 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 19 day of February, 1921  
J. W. McCremon, 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.....	\$.....
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.....	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.....	\$.....

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The State of Alabama,

*Baldwin* COUNTY.

IN CIRCUIT COURT, IN EQUITY.

*Robert Brown*

vs. Complainant,

*Blair Brown*

Defendant.

Deposition Taken Before Register on Interrogatories.

Deposition of *Merriman*

for *Complainant*

Filed *19* day of *Feb*, 19 *21*

Published by order of the Court \_\_\_\_\_

\_\_\_\_\_, 19 \_\_\_\_\_

*D. Merriman*  
Register.