# STATE OF VIRGINIA, s. s. city of portsmouth.



I, E. THOMPSON, Clerk of the Circuit Court of the City of Portsmouth, in the State of Virginia, do
hereby certify that in the Clerk's Office of said Court, on the day of May
1921. Jessie He Marden was appointed by said Clerk
administrat of the estate of May I Merd deceased,
and that the said fissie He Mard duly qualified before said
Clerk, by giving the necessary bond and taking the required oaths, and that the said
is duly authorized to discharge the duty of
administrat 2 fas aforesaid.

In testimony whereof I have hereto set my hand day of December

.. 192/, in the 14/8/12

year of the Commonwealth.



SEP 28 1921 BAY MINETTE, ALA. Baldwin County Bank 61-258 PAY TO THE O. C. Pridham

The State of Alabama, Baldwin County.	No
	THE PARTY OF THE P
	Ransom Williams Complainant
	vs.
	Katie Williams, Defendant
	Term, was submitted upon the Bill of Complaint, decree pro confesso d, upon consideration thereof, the Court is of opinion that the Com- said bill.
	I and decreed by the Court, that the bonds of matrimony heretofore nt be, and the same are hereby dissolved, and the Complainant is for-
ever divorced from the Defendant.	
It is further ordered, that the said	Ransom Williams,
be, and he is hereby permitted to again co	ontract marriage, upon the payment of the costs of Court in this cause.
It is further ordered, that the said	Ransom Williams,
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 Katie Williams,
It is further ordered, adjudged and decre	ed that said Ransom Williams,
	Katie Williams,
until sixty days after this date, and that if an	appeal is taken within sixty dayshe shall not marry again except
to said Katio Willia	ms., during the pendency of said appeal.
17th Ma	
This 17 th day of Ma	192 1
	1 NOTIN Xugh
	Judge of the Circuit Court of Baldwin County.
THE STATE OF ALABAMA,	CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY.	SOUNT, IN EQUITI.
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
	192, in the cause of
	Complainant
	vs.
as appears of record in said Court.	Defendant
Witness my hand and the seal of said Coun	rt, this theday of192
	Register.

No. 304.
THE STATE OF ALABAMA, BALDWIN COUNTY.
CIRCUIT COURT IN EQUITY. BALDWIN COUNTY, ALA.
som Williams,
Vs. Katie Williams,
DECREE OF DIVORCE.
Filed in office this 18au  y of Machiner 192 1
Register.

RECORDED

# THE STATE OF ALABAMA, BALDWIN COUNTY.

# CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

WE COMMAND YOU, That you summon	Wanna	3
The Comment Foo, that you summon Ker	ie wittene.	
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	1	
of Moss Pint Miss.	e and appear before the Judge	of the Circuit Court of Bald-
win County, exercising Chancery jurisdiction, within thin	ty days after the service of Su	mmons, and there to answer,
plead or demur, without oath, to a Bill of Complaint late	ly exhibited by	7.
, dww		
3444 - 14/84 - 14/84		
Ransom	/illiams,	
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		gash same
and further to do and perform what said Judge shall order	and direct in that habits to	
shall in no wise omit, under penalty, etc. And we furthe		
thereon, to our said Court immediately upon the execution		writ with your endorsement
†	thereof.	
WITNESS T W Pink P		
WITNESS, T. W. Richerson, Register of said Circuit	Court, this	day of April
192	Dan 1	,
	J & You	curron
		Register.

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

304		
Circuit Court of Baldwin County		
In Equity		
No		
SUMMONS		
Rausombrus		
7.00		
<u> </u>		
vs.		
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Orona Thickness		
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	
	Defendant
	Sheriff
By Dep	outy Sheriff

# THE STATE OF ALABAMA, BALDWIN COUNTY.

# CIRCUIT COURT OF BALDWIN COUNTY, IN EQUITY.

To any Sheriff of the State of Alabama-GREETIN	NG:
WE COMMAND YOU, That you summon	Katie Williams,
.1 3	
Manager Denda Me	
of MOSS FIRT MISS, County,	to be and appear before the Judge of the Circuit Court of Bald-
win County evergising Chancery jurisdiction within	n thirty days after the service of Summons, and there to answer,
win county, exercising chancery jurisdiction, within	a timely days after the service of bummons, and there to discover,
plead or demur, without oath, to a Bill of Complain	nt lately exhibited by
D	
nans	om Williams,
against said	
	illion
11	LLLLAMS.
-	
nd further to 1	er and J:
to do and perform what said Judge shall order	er and direct :
and in no wise omit, under penalty, etc. And we first	er and direct in that behalf. And this the said Defendant
ereon, to our said Court immediately upon the execution	ner command that you return this writ with your endorsement
upon the execution	on thereof.
Wilman	
WIINESS, T. W. Richerson, Register of said Co.	it Court, this 5th, day of April,
192. I.	Court, this 5th, day of America
	or april.
	Marso.
	J. M. Richard
N. B.—Any party defendant is entitled to a copy of	
and is entitled to a con-	Register.

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

Circuit Court of Baldwin County In Equity
In Equity
No
SUMMONS
vs.
Solicitor for Complainar Rocorded in Vol. Page

# THE STATE OF ALABAMA BALDWIN COUNTY

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Sheriff
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### Mrooks & McMillan Attorneys at Law Mobile

Apr. 4, 1921.

Mr. T. W. Richerson, Bay Minette, Ala.

Dear Tom:

## Ranson Williams v. Katie Williams.

We enclose herewith the defendant's answer denying the allegations of the bill of complaint and waiving forms and notices, etc., in regard to depositions. Please issue and send to us a commission to take the testimony of Ranson Williams and naming S. H. Bailey of this place as commissioner.

Very truly yours,

McM/J.

### RETURN RECEIPT.

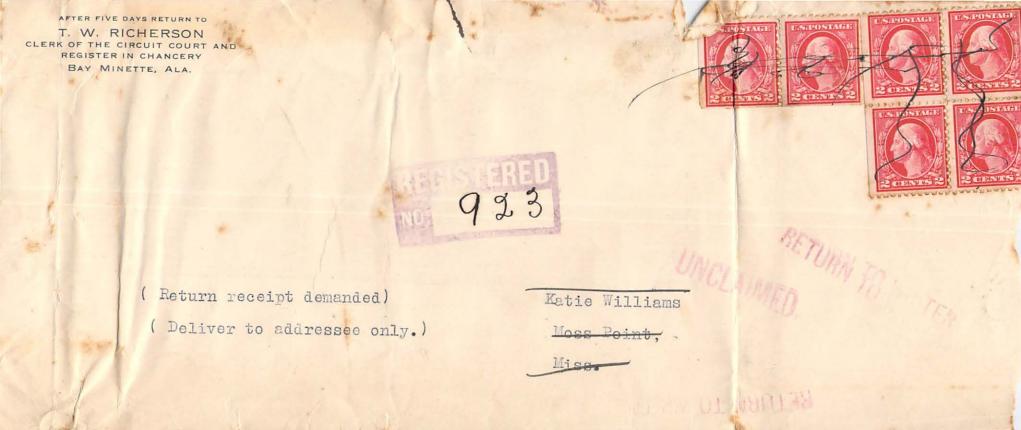
(Signature or name of addressee.)	

(Signature of addressee's agent.)

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Form 3811

Fost Office Department		PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300.
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Commissioner Maccas Heccian CO muras rouer older Tilland Tenoissi, mmob

Apr. 21, 1921.

Mr. T. W. Richerson , Bay Minette, Ala.

Dear Tom:

### Ranson Williams v. Katie Williams.

I was unable to get the witnesses before the commissioner here and therefore want to take the testimony of Ranson Williams and George Griffin, Jr., before Wallace Kilcrease at Stockton.

I am enclosing herewith a demand for oral examination. Please file it as of date you issue the commission.

I sent you a note by Ranson Williams to-day asking that you send this commission to me through to-night's mail but I neglected to put the demand for oral examination in the letter.

I understand that Katie Williams is still at Moss Point, and wish you would send another registered letter to her there, in which enclose copy of the bill of complaint. I think she will now go to the post-office and get it.

Very truly yours,
Bheymelengt

McM/J. Encl.

1

### Mrnoks & Mr Millan Attorneys at Law Mobile

Apr. 19, 1921.

Hon. T. W. Richerson, Bay minette, Ala.

Dear Tom:

Rangon Williams V. Katie Williams.

Answering your postal of April 18th. I have heretofore sent you the defendant's answer to the bill in Chancery we filed against Katie Williams.

Under the circumstances we believe that this will be sufficient to enable the Court to proceed to final decree and therefore you need not have publication made. The answer is executed before a Notary Public which I think will be sufficient evidence of its authenticity.

Very truly yours,

Toler 14 ce Omice

McM/J.

STATE OF ALABAMA, \*
BALDWIN COUNTY. \*

IN THE CIRCUIT COURT OF SAID COUNTY.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF SAID COURT:

Humbly complaining your orator, Ransom Williams, as complainant, brings this bill of complaint against Katie Williams, as respondent, and respectfully shows:

#### ONE

Complainant is a bona fide resident of Stockton, in Bald-win County, Alabama, and has been such resident for more than five years last passed and is over the age of twenty-one years; the respondent, Katie Williams, up to a few years ago was a bona fide resident of Baldwin County, Alabama, but complainant is informed and believes, and upon such information and belief states, the fact to be that she now resides at Moss Point, in the State of Mississippi; and she is over the age of twenty-one years.

### TWO

Complainant and said respondent were married to each other about nineteen years ago in Baldwin County, Alabama, and they lived together as man and wife for years thereafter, during all of that time residing in Baldwin County, Alabama, but they have not lived together for more than six months last passed, having separated from each other in Baldwin County, Alabama, which separation was not occassioned by the fault of complainant, but was for the reasons stated in the succeeding paragraph hereof.

#### THREE.

After the said marriage with Complainant, the respondent Katie
Williams became unduly intimate with a man by the name of Richard
Lawrence, and afterwards ran away from Complainant and went with
the said Richard Lawrence and lived with him in a state of adultery
at Moss Point Mississippi, and Complainant is informed and believes
the respondent
and upon such information and belief states that she is now living
with said Richard Lawrence, and Complainant charges her with adultery

The premises considered complainant prays that your Honors will take jurisdiction of the cause made by this bill of complaint and by proper process issuing to her from this Honorable Court, that the said Katie Williams be made a party respondent hereto and be required to answer the charges herein made against her in all things as required rules and practice of this Honorable Court.

Compainant further prays that upon the hearing of this evidence your Honors will decree that the bonds of matrimony heretofore existing between complainant and respondent be forever dissolved and that the said complainant be permitted to contract another marriage should he so desire and complainant further prays for such other, further and different relief as in equity and good conscience may be due him in the premises, and in duty bound complainant will ever pray, etc.

Solicitors for Complainant.

Note.

The respondent, Katie Williams, is required to answer each and every allegation and paragraph of the foregoing bill of complaint, but her oath thereto is hereby expressly waived.

Brook all mells,
Solicitors for Complainant.

State of Alabama, )
County of Baldwin, )

Begore me, Most Mercullar a Notary Public in and for said State and County personally appeared Ranson Williams, who is known to me and who being by me duly sworn says on oath that the allegations of the foregoing bill of complaint are true.

Ronoum Williams

Sworn to and subscribed before me this 26 day of March 1921.

Notary Public, Baldwin County, Ala.

RANSON WILLIAMS,

Complainant,

V.

IN THE CIRCUIT COURT OF BALDWIN COUNTY.

KATIE WILLIAMS,

Respondent.

And now comes the respondent, and answering the bill of complaint in this cause, this respondent denies the allegations thereof and demands strict proof thereof.

Ratie Williams

Dated this 30 day of March 1921.

And now comes, Katie Williams, the respondent and agrees that the complainant may take his evidence and submit the cause for final decree without further notice to this respondent.

This respondent hereby waives all forms and notices.

Statie williams

Dated this & day of March, 19211

State of Mississippi, County of Jackson,

I Francis Da Francis a Notary Public in and for said State and County hereby certify that Katie Williams, whose names is signed to the foregoing waiver and who is known to me acknowledged before me on this day that being informed of the contents she executed the same voluntarily on the day the same bears date.

Given under my hand and seal this 37 day of March, 1921.

My Commercia Notary Public, Jacks on County, Miss.

34 June 1982

# The State of Alabama, Mabile County

F4

RANSON WILLIAMS,

KATIE WILLIAMS

Complainant

Circuit Court of Mobile County

No.

vs.

Defendant

IN EQUITY

The Plaintiff

requests the oral examination of the following named witness on his behalf, viz.:

Ransom Williams and George Griffin, Jr., Stockton, Alabama

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

Wallace Kilcrease

who reside at Stockton, Alabama

is suggested as a suitable person to be appointed Commissioner to take the depositions of said

witness es on such oral examination

Brown allemillon.

Solicitor for ... Complainant.

Circuit Court of Mobile County BALDWIN EQUITY RANSON WILLIAMS KATIE WILLIAMS. Demand for Oral Examination Register POWERS PRINTING CO.

Ransom Williams, Complainant \*

~V8~

Katie Williams, Respondent.

In Circuit Court of Baldwin County, Alabama. In Equity.

Personally appeared before me, Wallace Kilcrease, the Commissioner named in the attached commission, Ransom Williams and George Griffin Jr, material witnesses for the Complainant in the above entitle Cause, who being by me first duly sworn, depose and say as follows:

## Deposition of Ransom Williams.

First. My name is Ranson Williams. I am 40 years old. I live at Stockton, In Baldwin County, Alabama and am now and for the last 21 years have been a bona fide resident of Stockton, Baldwin County, Alabama. I am Complainant in this suit.

Second. The rrespondent Katie Williams is over 21 years old. She is about 40 years old. Up to a few years ago she was a bona fide resident of Stockton, Baldwin County, Alabama but she now resides at Moss Point in the State of Mississippi. She is a mile or so out from Moss Point, but that is her present Post Office.

Third. The respondent Katie Williams and I were married to each other at vStockton, In Baldwin County, Alabama about 19 years ago. We lived together as man and wife for a good many years after we were married, all of the time residing at Stockton. in Baldwin County, but we have not lived together for more than six months before the Bill of complaint in this case was filed. We were separated more than six months before this bill was filed in Baldwin County, Alabama. The separation was not in any way due to my fault.

Fourth. After we were married the respondent Katie Williams became unduly intimate with a man named Richard Lawrence. This was while she, respondent was living with me as my wife. Lawrence had been boarding at my place and it was while he was living there as a boarder that he first became intimate with my wife, the respondent While he was boarding there my wife left my home and went to stay with the sister of Richard Lawrence in Mobile county for awhile and while she was at his sisters Richard left my home and went to his sisters too. It was then that I first became suspicious of the them. They then became bolder and the people in the neighborhood were talking about their improper relations with each other. I got after the respondent about it and she admitted that she had been living with Lawrence in my home while I was away in a state of adultery.

FIFTH. After I discovered the improper relations of my wife and Lawrence, they left Stockton together and came to Mobile County where they lived together in a state of adultery and later they went to Moss Point to lived and at the time this Bill of complaint was filed and for a long time before, they were living there together in a State of adultery. I did not condone her offense.

# Deposition of George Griffin Jr.

My name is George Griffin Jr. I am over 21 years old. I live at Stockton, Alabama.

I know the parties in this suit and have known them many years. I know they have not lived together for more than six months. They are both much more than 21 years old.

The Complainant resides at Stockton, Alabama and has resided there many years. The respondent Katie Williams did live at Stockton up to about a year ago but she is now living at Moss Point, Missis ippi...

I lived next door to the parties to this suit for five years before they were separated. I know that for a considerable while before they were separated the respondent and Richard Lawrence were unduly intimate with each other. Lawrence is a man and the respondent is a woman and the two were together almost all the time while Ransom Williamd was away from home. I never did see Lawrence and the respondent in the act of having sexual intercourse with each other but have seen them together under very compromising conditions and their improper conduct with each other was commonly talked in the community.

Some time about a year ago Lawrence and the respondent left Stockton together. I know that they were later living together at Moss point Missippippi and understand they are living there now as man and wife.

The Complainant is an honest hard working man. I know that he treated respondent right while she was with him. For some time before respondent left complainant she did not seem to care any thing for complainant nor for any body else except Richard Law rence. She did not seem to care what she and Lawrence did nor what people said about them.

Jeorge Griffen Tr

### COMMISSIONER'S CERTIFICATE.

I, Wallace Kilcrease, the commissioner named in the attached commission, do hereby certify that I have been made personally acquainted with Ranson Williams and George Griffin, Jr., witnesses in the above case, and know them to be the identical persons named in said commission; that after being by me first duly sworn to speak the truth, the whole truth and nothing but the truth they testified as above stated and their evidence was taken down by me as nearly as might be in their own language, and was read over by them and was subscribed by them in my presence on the lithday of April, 1921.

I further certify that I am neither of counsel nor kin to any of the parties to this suit nor in anywise interested in the result thereof.

Witness my hand and seal this 2 Chicay of April, 1921.

Maceacel Kielerea (Seal)
Commissioner,

The State of Alabama Coun Defendani Plaintiff SE COMMISSION TO TAKE DEPOSITION ON CIRCUIT COURT, SANTERROGATORIES. S.S. 22nd. WITNESSES MARSHALL & BRUCE CO., Williams vs. Issued this. Baldwin nsom Ransom

# 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 subpoen 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 and saith as follows:

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:

C D v. E F

To Esq.,

CLERK OF THE CIRCUIT COURT.

DEPOSITION OF County, Ala.

CEIPT FOR REGISTERED ARTICLE NO. 92 class postage paid. Addressed to Return receipt desired ... To addressee in person \_\_\_\_ Postmaster, per Delivery restricted

THE STATE OF ALABAMA, CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY.  NoTerm, 197
Ransoni Gilliams Complainant
VS.
Natir milliams Defendant
To Meieron Register:
To Register:
In the above stated cause a Decree Pro Confesso having been taking against the Defendant, and evidence hav-
ing been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the
Broser Muchaelan
Complaiant, by
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.
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Solicitor for Complainant.

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THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

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Ransom Williams,	
	THE STATE OF ALABAMA,
	BALDWIN COUNTY
vs.	
Katie Williams	IN EQUITY,
	CIRCUIT COURT OF BALDWIN COUNTY.
This cause is submitted in behalf of Comp.	lainant upon the original Bill of Complaint,
	ony of Ranson Williams and George
	OHA OH TRANSON WALL LAMB AND GROUGE
riffin, Jr.,	
nd in behalf of Defendant upon	
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No 304

### THE STATE OF ALABAMA, BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

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Ransom Villiams
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NOTE OF TESTIMONY.
Filed in Open Court this 14 Ca

Register