

312

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 Peter H. Seibert,

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 Seibert,

against said

Peter H. Seibert,

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 8th day of July,

1921

*T. W. Richerson*

Register.

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

*Original 12*

Serve on \_\_\_\_\_

Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

Mary Seibert.

vs.

Peter H. Seibert.

Summerdale.

W.S. Anderson.

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

Received in office this *8th* \_\_\_\_\_

day of *July* \_\_\_\_\_ 192*1*

*W.R. Stuart*

Sheriff

Executed this *28* \_\_\_\_\_ day of

*July* \_\_\_\_\_ 192*1*

by leaving a copy of the within summons with

*Peter H. Seibert*

Defendant

*W.R. Stuart*

Sheriff

By *B.D. Wiggins*  
Deputy Sheriff

The State of Alabama, }  
BALDWIN COUNTY.

No. \_\_\_\_\_ CIRCUIT COURT IN EQUITY.

..... Mary Seibert ..... Complainant.....

vs.

..... Peter H. Seibert ..... Defendant.....

Motion is hereby made for a Decree Pro Confesso against .....

..... Peter H. Seibert ..... 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 .....10th.....day of .....September.....1921.

*Am S Anderson*

Solicitor. *pr*

*Comp't.*

No. .... Page .....

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Mary Seibert

Vs.

Peter H. Seibert

MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE

Filed September 10th 1921.

*D. M. Picurion*  
Register.

Recorded in ..... Record,

Vol. .... Page .....

Register.

*Vertical text and signatures on the right side of the page, including "Baldwin Times Print" and "Bay Minette".*

THE STATE OF ALABAMA,  
Baldwin County.

No. ....

CIRCUIT COURT, IN EQUITY.

Mary Seibert ..... Complainant  
vs.

Peter H. Seibert, ..... Defendant

In this cause it appears to the Register  
that a Summons requiring the Defendant Peter H. Seibert

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the service of  
said Summons upon him

was served upon him by the Sheriff of Baldwin County, Alabama, on the  
28th day of July 1921, and the said Defendant having

failed to demur, plead to or answer the said Bill of Complaint to this date, it is now, therefore, on motion of  
Complainant's Solicitor

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as con-  
fessed against the said Peter H. Seibert

Defendant aforesaid.

This 12th day of September 1921.

*T. W. Williams*

Register.

No. .... Page .....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Mary Seibert

vs.

Peter H. Seibert

DECREE PRO CONFESSO ON  
PERSONAL SERVICE.

Issued September 12th. 1921

*J. W. Rice*

Register.

Recorded in ..... Record.

Vol. .... Page .....

Register.

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

No. .... *Vacation* Term, 19*21* .....

*Mary Seibert*

Complainant.....

vs.

*Peter H Seibert*

Defendant.....

To *W. T. Richardson* ....., 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 *Wm S Anderson Esq* .....

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.

*Wm S Anderson*

Solicitor for Complainant.

4 in

No. .... Page .....

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

Mary Seibert

vs.

Peter H Seibert

REQUEST FOR DECREE IN  
VACATION.

Filed Nov 2<sup>nd</sup> 1921

*D. M. Williams*

Register

Recorded in ..... Record

Vol. .... Page .....

Register



Mary Seibert  
vs.  
Peter H. Seibert

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 deposition of following  
witnesses:

Mary Seibert  
My W. Owen &  
W. Hawkins

and in behalf of Defendant upon

J. W. Beckman

Register

5th

No. ....

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

Mary Seibert

vs.

Peter H Seibert

NOTE OF TESTIMONY.

Filed in Open Court this 2nd

day of Nov 1921

D. M. McCremon

Register

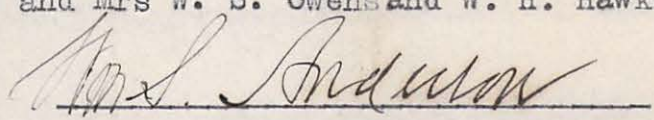
Mary Seibert, )  
Complainant )  
vs. )  
Peter H. Seibert, )  
Defendant. )

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

Comes the Complainant in the above stated cause by her Solicitor and makes this application for the oral examination of the following named persons as witnesses for Complainant, and suggests the Register of this Court as a suitable person to act as Commissioner in taking the testimony of said witnesses;

The names of such witnesses are,

Mary Seibert and Mrs W. S. Owens and W. H. Hawkins.



Solicitor for Complainant.

*[Faint, mirrored text from the reverse side of the page, including the name 'W. S. Owens' and other illegible words.]*

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Mary Seibert

vs.

Peter H. Seibert

Demand for Oral examination  
of witnesses.

Filed Sept 16th. 1921.

J. W. Kierman

Register.

Comprehension in taking the testimony of said witnesses:  
 The names of such witnesses are:  
 J. W. Kierman and Mrs. J. H. Green and W. H. Hawkins.  
 J. W. Kierman  
 J. W. Kierman

the following named persons as witnesses for complainant, and the  
 Police Officer and others who are present for the oral examination of  
 witness the said defendant in the above stated cause do hereby  
 certify that the said defendant is duly sworn and that the  
 above named persons are duly sworn and qualified as witnesses.  
 In witness whereof, I have hereunto set my hand and the seal of  
 the Court at St. Louis, Missouri, this 16th day of September, 1921.  
 J. W. Kierman  
 Clerk of Court

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

Mary Seibert, Complainant vs.

Peter H Seibert Defendant

Deposition of 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,

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

caused to come before me Mary Phleiger, and Ellen Owen, W.H. Hawkins,

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

Mary Seibert witness for complainant who being duly sworn testi-

-fied as follows: My name is Mary Seibert, I am the complainant in this cause, and Peter H Seibert is the defendant, we are both over the age of 21 years and are both bonafide residents of Baldwin County Alabama. And have been such residents for more than 6 years next before the filing of the bill in this cause.

I married the defendant in May 1914, and since said marriage we have lived together in Baldwin County, Alabama until sometime in December 1920, when we seperated and we have not lived together since.

I know the defendant for about 3 years before we were married and all the time that I knew him he was a sober and industrious man. Since ~~the~~ our marriage and for about 2 years before we seperated he became a habitual drunkard, He was drunk nearly all the time. Sometimes he would sober up for a few days and then would go to drinking and keep it up for a week or more at a time.

Most of the time he was drunk, sometimes for a week or more he would not speak to me, his conduct was such that it was almost impossible to live with him. I have 3 children by a former husband but no children by the defendant.

I own a small cottage in the town of Summerdale which is partly paid for I am paying for it ten dollars per month and owe something over five hundred dollars. Since I seperated from my husband I have made a living for myself and children by taking boarders and renting out rooms in this cottage. The defendant owns real estate in Summerdale but I do not know how much.

The property described above is all that I do own.

Mary Seibert

~~Mrs~~ W.S.Owen, witness for complainant ~~at & & & & & &~~ who being duly  
duly sworn testified as follows:

My name is Mrs. W.S.Owen, I reside at Summerdale, Baldwin  
County Alabama and I know Mary Seibert and Peter H Seibert the  
parties to this suit I have known them both for about ten years  
they have resided during that time in the town of Summerdale in  
Baldwin County, Alabama, I knew them when they were married in May  
1914, and they have lived since that time in the town of Summerdale,  
they lived together until some time in December 1920, since then  
they have lived apart I knew Peter H Seibert in the Town of Summerdale  
for three or four years before his marriage to Mrs. Seibert and I  
always considered him a strictly sober, industrious man if he was ever  
drunk before he was married I never heard of it for the last 2 or  
3 years before he and his wife separated he had become a habitual  
drunkard. I saw him frequently during that period and whenever I  
saw him he was drunk.

*Mrs W S Owen*

W.H.Hawkins, after being duly sworn deposes and says as follows:

My name is W.H.Hakins and I am a practicing Lawyer in Bay Minette  
Alabama, in my judgment as a Lawyer \$50.00 would be a reasonable  
Attorneys for Complainants Solicitor in this cause.

*W H Hawkins*

I, T. W. 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 them, that they assented, swore to and subscribed the same in my presence, the 28th day of October, 1921 at Bay Minette, 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 28th day of October, 1921.

T. W. 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	\$.....

REGISTER'S FEES.

.....	days at \$1.50 per day	\$.....
.....	words at 20 cents per hundred	\$.....

The State of Alabama, Baldwin County.

CIRCUIT COURT, IN EQUITY.

Mary Seibert, Complainant

vs.

Peter H Seibert Defendant

Deposition of 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,

T.W. Richerson,

Register of said Court of said County, have called and

caused to come before me Mary Phleiger, and Ellen Owen, W.H. Hawkins,

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

Mary Seibert witness for complainant who being duly sworn testi-

-fied as follows: My name is Mary Seibert, I am the complainant in this cause, and Peter H Seibert is the defendant, we are both over the age of 21 years and are both bonafide residents of Baldwin County Alabama. And have been such residents for more than 6 years next before the filing of the bill in this cause.

I married the defendant in May 1914, and since said marriage we have lived together in Baldwin County, Alabama until sometime in December 1920, when we seperated and we have not lived together since.

I know the defendant for about 3 years before we were married and all the time that I knew him he was a sober and industrious man.

Since ~~the~~ our marriage and for about 2 years before we seperated he became a habitual drunkard, He was drunk nearly all the time.

Sometimes he would sober up for a few days and then would go to drinking and keep it up for a week or more at a time.

Most of the time he was drunk, sometimes for a week or more he would not speak to me, his conduct was such that it was almost impossible to live with him. I have 3 children by a former husband but no children by the defendant.

I own a small cottage in the town of Summerdale which is partly paid for I am paying for it ten dollars per month and owe something over five hundred dollars. Since I seperated from my husband I have made a living for myself and children by taking boarders and renting out rooms in this cottage. The defendant owns real estate in Summerdale but I do not know how much.

The property described above is all that I do own.

Mary Seibert



T. W. RICHESON  
CLERK AND REGISTER CIRCUIT COURT  
BALDWIN COUNTY, ALA.

Mary Seibert - 3

<sup>vs.</sup>  
Peter H. Seibert - 3

BAY MINETTE, ALA.

Received from Peter H. Seibert the sum  
of Fifty Dollars, being the amount of the  
attorneys fee to Complainants Solicitor, which  
was ordered by the Court in its Decree that  
said Peter H. Seibert pay to Complainants  
Solicitor in the case of Mary Seibert vs Peter  
H. Seibert -

W. S. Anderson

Solicitor for Complainant.

P. H. SEIBERT,	)	
COMPLAINANT.	)	CIRCUIT COURT BALDWIN COUNTY, ALABAMA.
	)	
VS	)	IN EQUITY SITTING.
	)	
MARY SEIBERT,	)	
DEFENDANT.	)	

TO THE HONORABLE JOHN D. BEIGH, JUDGE OF SAID COURT,  
IN EQUITY SITTING:

Comes P. H. SEIBERT and humbly complaining against  
MARY SEIBERT shows unto your HONOR as follows:

FIRST: That Complainant and the said Mary Seibert are  
both over the age of twenty-one years and both reside at Summer-  
dale, Baldwin County, State of Alabama.

SECOND: That Complainant and said Mary Seibert are  
husband and wife, having intermarried about six years ago.

THIRD: That on to-wit: December 10, 1920, said Mary  
Seibert did commit adultery with one Cy Plunket, whereupon said  
Complainant remonstrated with said Mary Seibert and they separated;  
that since their separation Complainant has learned that said said  
Mary Seibert has committed adultery with various persons and at var-  
ious times with persons whose names are unknown to Complainant.

WHEREFORE, Complainant prays this Honorable Court to take  
jurisdiction of the cause made by this Bill of Complainant and by  
appropriate process make the said Mary Seibert party defendant  
hereto, requiring her to plead, answer, or demur to this bill of com-  
plaint within the time and under the usual penalties required by  
law and the practice of this Honorable Court;

And Complainant further prays that upon the final hearing  
of this cause your Honor will make and enter a decree forever dis-  
solving the bonds of matrimony existing between Complainant and the  
said Mary Seibert; and your Complainant prays for such other, fur-  
ther and different relief as in the premises he may be entitled to  
have.

*Rickaby & Duke*  
Solicitors for Complainant

Defendant is required to answer the allegations of each paragraph of the foregoing bill of complaint, first to third, both inclusive, but not under oath, oath is hereby expressly waived.

*Rickard & Beebe*  
Solicitors for Complainant.

HAMMERSMITH  
BOND

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 Seibert

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

P.H. Seibert,

against said

Mary Seibert,

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 12th, day of April

1921.

*T. W. Richerson*

Register.

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

2 Original

Serve on \_\_\_\_\_

Circuit Court of Baldwin County  
In Equity

No. \_\_\_\_\_

SUMMONS

P.H. Seibert

vs.

Mary Seibert.

*at Summerville.*

Rickarby and Beebe.

Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

Received in office this \_\_\_\_\_

day of \_\_\_\_\_ 192

Sheriff

Executed this 27<sup>th</sup> day of

April 1921

by leaving a copy of the within summons with

*Mary Seibert*

Defendant

*W.R. Street*

Sheriff

By \_\_\_\_\_

Deputy Sheriff

RECORDED

T. W. RICHERSON  
CLERK AND REGISTER CIRCUIT COURT  
BALDWIN COUNTY, ALA.

BAY MINETTE, ALA..

P.H.Seibert, )

vs )

Mary Seibert )

Circuit Court, Baldwin County, Alabama/  
In Equity

Comes the Complainant in the above styled cause and dis-  
misses the aforesaid cause, and shows to the court that all costs  
have been paid.

*Rickard & Beebe*  
Solicitors for Complainant

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The State of Alabama, }  
Baldwin County.

No. .... CIRCUIT COURT, IN EQUITY

Mary Seibett, Complainant

vs.

Peter H. Seibert, 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 on account of his becoming addicted after marriage to habitual drunkenness. It is further ordered that said defendant, Peter H. Seibert, pay to the Complainant's Solicitor in this case, the sum of Fifty Dollars, as a reasonable attorney's fee for his services in this case, the same to be charged against him as part of the costs in this case.

It is further ordered, that the said Mary Seibert, the Complainant, 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 Peter H. Seibert, the defendant, 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 Seibert, the Complainant.

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

This 5<sup>th</sup> day of November 192

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. ....

THE STATE OF ALABAMA,  
BALDWIN COUNTY.

CIRCUIT COURT IN EQUITY,  
BALDWIN COUNTY, ALA.

Mary Seibett

Vs.

Peter H Seibett

DECREE OF DIVORCE.

Filed in office this 7th

day of Nov, 1921

D W Keenan

Register.

E. O. M.

RECORDED

*[Faint, illegible text from the reverse side of the document, likely bleed-through from the other side of the paper.]*

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Mary Seibert, )  
Complainant, )  
vs. )  
Peter H. Seibert, )  
Defendant. )

CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.  
In Equity.

To the Hon. John D. Leigh, Judge of said Court:

The Bill of Complaint of Mary Seibert exhibited against Peter H. Seibert shows unto your Honor as follows:

First.

Complainant shows unto your Honor that both she and said Peter H. Seibert are over the age of twenty-one years and both reside in Baldwin County, Alabama, and have been bona fide residents of said County for more than six years next before the filing of this Bill.

Second.

Complainant shows unto your Honor that she and the said defendant were <sup>married</sup> in the month of May 1914 and since said marriage have lived together in Baldwin County, Alabama, until some time in December 1920 when they separated and have not lived together since.

Third.

Complainant shows unto your Honor that when she married defendant, he was a sober and industrious man, and she had every reason to expect and did believe that he would make her a good husband, but she now shows unto your Honor that since their marriage, he has become addicted to habitual drunkenness, and it became impossible for her to continue to live with him in such peace and quiet as she had the right, to expect.

Fourth.

Complainant shows to the Court, that she has three small children by a former husband, but none by the defendant. That the only property she owns is a small cottage in Summerdale, which she has partly paid for and is paying for at Ten Dollars a month. She still owes something over five hundred dollars on this house. She is making a living for herself and children by taking boarders and renting out rooms in this house. She does not know fully what property defendant owns, nor just what he is worth, but she knows he owns several pieces of real estate in the Town of Summerdale.

Prayer for Process.

Complainant <sup>prays</sup> that your Honor will take jurisdiction of this cause and that the State's writ of subpoena may issue to the said Peter H. Seibert requiring him to plead, answer or demur to this her bill of complaint within the time required by law and the rules of this Court.

Prayer for Relief.

The premises considered she prays that on the coming in of the testimony in the case your Honor make and enter a decree dissolving the bonds of matrimony existing between her and said Peter H. Seibert and will further order and direct that said Peter H. Seibert pay as a part of the costs in this case, a reasonable attorney's fee to her Solicitor for his services in this case; and Complainant prays for such other further or different relief as in the premises she may be entitled to.

*M. S. Anderson*

Solicitor for Complainant.

Foot note:

The defendant is required to answer each paragraph of the foregoing bill from paragraph 1st to paragraph 4th. both inclusive, but not under oath, his oath being expressly waived.

*M. S. Anderson*

Solicitor for Complainant,