

TWENTY-FIRST JUDICIAL CIRCUIT

OF ALABAMA

F. W. HARE, JUDGE

R. L. JONES, CIRCUIT SOLICITOR

M. R. FARISH, COURT REPORTER

MONROEVILLE, ALABAMA

June 14, 1939

Mr. Orvis M. Brown,  
Robertsdale, Alabama.

Dear Orvis:

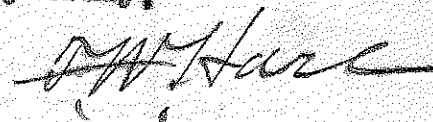
I have just received the bill and testimony in the case of Burnetta Long vs. Robert F. Long, and am returning the same to the Register without decree, for the reason that you failed to prove cruelty. All you proved was that they didn't get along very well together, and I thought perhaps you would wish to take additional testimony.

I have also carefully read the bill and testimony in the case of Berdella C. Gooden vs. B. B. Gooden. In this case, I do not think you have either alleged or proven grounds for divorce. You were evidently driving at Section 7409 of the Code, as amended by Acts of 1933, page 142, which provides that divorces may be granted where the wife has lived separate and apart from the bed and board of the husband for two years without support from him for the two years next preceding the filing of the bill.

I have rendered no decree in either case because I do not wish to dismiss the bills with prejudice, but desire to give you an opportunity to make such amendments and take such testimony as may be necessary to come within the statute.

With regards and best wishes, I am,

Yours very truly,



C-C Mr. R. S. Duck, Register,  
Bay Minette, Alabama.

FWH/r.

TESTIMONY OF BERDELLA C. GOODEN, COMPLAINANT IN THIS CAUSE.

My name is Berdella C. Gooden. I am a resident of Fairhope, Alabama in Baldwin County and am the Complainant in the above styled cause, and in addition to my original testimony now in the file in the above styled cause I wish to add this to my testimony. We have been separated off and on during the past two years as he has mistreated me for the last two years next previous to the filing of my petition for divorce, but I had put up with his treatment as long as I could. On several occasions he has slapped me and especially on September 3, 1938 on the face and shoulder ~~but~~ I, thinking that he would do better, have gone back from time to time and lived with him. Since the last occasion of his striking me which was on or about April 20th, 1939 at which time he struck me about the face and shoulder I have not gone back to him and have not lived with him as man and wife. Due to his conduct in the past I do not believe that it would improve any in the future and I do not feel that it is safe and I have all reason to believe and do believe that if I continue to live with him that he would be striking me which would endanger my life and health and I find it impossible to live with him further. The Respondent has a very ungovernable temper especially when I call his attention to some of his conduct and he does not try to control his temper at all.

*Berdella C. Gooden*

TESTIMONY OF E. H. GOODEN

My Name is E. H. Gooden , I am a brother of the Respondent in this transaction, and I am a resident of Baldwin County, Alabama, and have been for the past 15 years and longer. I am personally acquainted with both of these parties they being my brother and sister-in-law. They are both over the age of twenty-one years of age and residents of Baldwin County , Alabama, and have been for the next three years preceeding the date of this suit. They were married in Pinckney, Michigan during the year of 1931. I do not recall at this time just exactly the month that they were married in. They first lived in Michigan, then they moved to Fairhope, Ala. They lived here in Fairhope at the time that they were seperated which was in April, about the 20th, 1939. I know for the past two years that B. B. Gooden has mistreated his wife, and especially on September 3rd, 1938 at which time he struck her about the face, they lived to-gether then off and on until about the 20th of April of 1939, at which time he struck her again about the face and she left him and they have remained seperate and apart since that time. I have no ill feeling against either of these parties. They do not have any childern. He has been very cruel to her for the past two years and she said that she could not stand it further.

E. H. Gooden

BERDELLA C. GOODEN,	)	
Complainant	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY,
vs	)	ALABAMA.
B. B. GOODEN,	)	IN EQUITY.
Respondent	)	

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA: IN EQUITY:

Comes your Complainant, Berdella C. Gooden, and humbly complaining against the Respondent, B. B. Gooden, respectfully represents and shows unto your Honor and this Honorable Court as follows:

ONE: That your Complainant and the Respondent are both over the age of twenty one years and that the Complainant is a resident of Fairhope, Baldwin County, Alabama, and the Respondent resides at Fairhope, Baldwin County, Alabama, also.

TWO: That your Complainant and the Respondent were married in Pinckney, Michigan on September 1, 1931 and lived together as husband and wife until on or about April 20th, 1939, but for the past two years have been separated off and on during that period of time.

THREE: That for the past two years the Respondent, B. B. Gooden, has failed to contribute to the support of your Complainant in the manner that is proper and sufficient for her maintenance taking into consideration her station in life, and the necessary funds to maintain herself in a manner which her station in life demands, and that since the date of the separation of your Complainant and the Respondent the Respondent has not contributed to the support and maintenance of your Complainant in any manner whatsoever and that your Complainant is in need of support and your Respondent has failed on all occasions to supply this necessary support and maintenance and has failed, refused and neglected to do so though she often requested it of him. That during the past two years your Respondent has not contributed to the support and maintenance of your Complainant in the manner that he should have and that during this period of time of separation from time to time she was of the opinion that eventually he would do better but he has failed and neglected to support your Complainant until the date of our separation. He is an able bodied man and capable of working and supporting his wife, but he has failed to do so and that the Respondent is a man of means and could support her if

he so desired.

FOUR: There were no children born to your Complainant and the Respondent of this marriage.

WHEREFORE, THE PREMISES CONSIDERED, the Complainant prays that your Honor will by proper process make the said B. B. Gooden party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalty prescribed by law and the practice of this Honorable Court.

Complainant prays that on the final hearing of this cause that this Honorable Court will give and grant unto her a decree of absolute divorce forever barring the bonds of matrimony existing between her and the Respondent, B. B. Gooden, that your Honor will further grant unto her the right of using her maiden name of Berdella C. Euler, and that this Honorable Court will further decree that the Respondent is to have and be liable for and have to pay all debts and accounts of every nature which are now standing in the name of your Complainant or in the name of the Respondent and that in the decree that this request will be so recited. And your Complainant further prays that she be given the right to marry again should she so desire and your Complainant further prays that all attorney fees, court costs and any other expense that might be attached to this proceeding be taxed as part of the court costs against the Respondent and that your Honor will give and grant unto her such other, further, different and/or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Berdella C. Gooden  
COMPLAINANT  
Miss A. Brown  
SOLICITOR FOR COMPLAINANT

FOOT NOTE:

The Respondent B. B. Gooden is requested to answer each and every allegation of the foregoing complaint numbering paragraphs One to Four inclusive but not under oath, oath hereby being expressly waived.

Berdella C. Gooden  
COMPLAINANT  
Miss A. Brown  
SOLICITOR FOR COMPLAINANT.

BERDELLA C. GOODEN,

Complainant

vs

B. B. GOODEN,

Respondent

EQUITY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

Comes B. B. Gooden, Respondent in the above styled cause and for answer to the Bill of Complaint says that he admits Paragraph One thereof, he admits Paragraph Two thereof, and he denies Paragraph Three thereof and demands strict proof thereof and he further admits Paragraph Four of the Bill of Complaint.

Respondent hereby waives service and notice of and demand for oral examination of the Complainant's witnesses, of the issue of commissioner to take testimony, notice of the time and place of the taking of the same and of the right to cross examine or introduce evidence in his own behalf; and he further consents that this cause may be submitted for final decree at any time on the pleadings of the Complainant's evidence as noted by the Register.

The Respondent hereby requests of this Honorable Court that he be given the right to marry again if he so desires upon the issuance of this final decree.

WITNESS:

Virginia C. Crenshaw

B. B. Gooden  
RESPONDENT.

The State of Alabama, {  
Baldwin County

CIRCUIT COURT

To VIRGINIA E. CRENSHAW

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Berdella C. Gooden and E. H. Gooden

as witnesses in behalf of Berdella C. Gooden in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Berdella C. Gooden

Complainant  
and B. B. Gooden

Defendant,  
on oath to be by you administered, upon them  
to take and certify the deposition s of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness FAO day of June 19 39

R. S. Duch

REGISTER

By - Hardie Thompson,  
Deputy

COMMISSIONER'S FEE, \$ \_\_\_\_\_  
WITNESS' FEES, \$ \_\_\_\_\_

AMENDED PETITION

BERDELLA C. GOODEN,	)	
	)	
Complainant	)	IN THE CIRCUIT COURT OF
	)	
vs	)	BALDWIN COUNTY, ALABAMA.
	)	
B. B. GOODEN,	)	IN EQUITY.
	)	
Respondent.	)	

TO THE HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA: EQUITY:

Comes now the Complainant, Berdella C. Gooden individually and by her attorney and by leave of the Court first had and obtained files this her amendment to the bill of complaint above styled and adds this paragraph as Paragraph Five and makes the same a part of the amended petition.

FIFTH: That the Respondent is a man of ungovernable temper; that on or about September 3, 1938 and various times thereafter and that on or about April 20, 1939 and various times prior thereto the Respondent has cursed, abused and threatened Complainant; and on to-wit, April 20, 1939 he did actual violence to her person by striking her on the face and on the shoulder; and his conduct is such that your Complainant has every reasonable apprehension to believe and does actually believe that if she continues to live with him he will continue to carry out his threats to do further violence to her person which will necessarily endanger her life and/or health.

*Berdella C. Gooden*  
Complainant  
*Wm. M. D. [Signature]*  
Solicitor for Complainant

FOOT NOTE: The Respondent, B. B. Gooden, is required to answer this amendment as Paragraph Five to the original Bill of Complaint but not under oath the same being hereby expressly waived.

*Berdella C. Gooden*  
Complainant  
*Wm. M. D. [Signature]*  
Solicitor for Complainant



ANSWER TO AMENDED BILL OF COMPLAINT

BERDELLA C. GOODEN,	)	
	)	
Complainant	)	IN THE CIRCUIT COURT OF
	)	
vs	)	BALDWIN COUNTY, ALABAMA.
	)	
B. B. GOODEN,	)	IN EQUITY.
	)	
Respondent.	)	

Comes now B. B. Gooden, the Respondent in the above styled cause, and for answer to the Amendment to the original bill of complaint which is Paragraph Five, states that he hereby denies Paragraph Five as amended and demands strict proof thereof.

Respondent hereby waives service and notice of the time of examination of Complainant's witnesses and issue of commission to take testimony, the notice of time and place of the taking of the same and the right to cross examine and introduce evidence in his own behalf; and he further consents that this cause may be submitted for final decree at any time on the pleadings of the Complainant's evidence as noted by the Register.

WITNESS:

Virginia Crenshaw

B. B. Gooden  
Respondent.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BERDELLA C. GOODEN, Complainant

VS.

B. B. GOODEN, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer and Waiver and Testimony as noted by the Register, and upon consideration thereof, the Court is of the 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 that the said BERDELLA C. GOODEN is forever divorced from the said

B. B. GOODEN

for and on account of Non-support; and Cruelty

It is further Ordered, adjudged and decreed that the Complainant BERDELLA C. GOODEN, be given the right to resume her maiden name of Berdella C. Euler;

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that BERDELLA C. GOODEN and B. B. GOODEN be, and they hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that B. B. GOODEN, the Respondent, pay the cost herein to be taxed, for which execution may issue.

This 8th day of July, 19 39

J. H. Ware, Judge Circuit Court, in Equity.

I, \_\_\_\_\_, Register of the Circuit Court for Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

Register of Circuit Court, in Equity.

STATE OF TEXAS

By and with the authority of the Board of Directors of the Texas State Board of Health, I, the undersigned, do hereby certify that the following is a true and correct copy of the report of the Board of Directors of the Texas State Board of Health for the year ending December 31, 1939. I am personally acquainted with the facts and figures herein set forth and believe them to be true and correct. Witness my hand and the seal of the Board of Directors of the Texas State Board of Health at Austin, Texas, this 1st day of January, 1940.

*[Signature]*

Filed July 6, 1939  
R. S. Daulton, Registrar

to be denied.

There were no children born to your complainant and

the respondent of this marriage.

PROCESSED BY THE CLERK OF COURT, THE DISTRICT COURT

that your honor will in proper process make the said J. E. Gooden party

respondent to this bill of complaint requiring him to plead, answer or

demur to the same within the time and under the penalty prescribed by

law and the practice of this honorable court.

Complaints were filed on the final hearing of this cause

that this honorable court will give and grant unto the

plaintiff divorce forever during the term of matrimony existing between

her and the respondent, B. E. Gooden, that your honor will further grant

and also her the right of using her maiden name of Gooden, and that

this honorable court will further decree that the respondent do to have

and so liable for and pay all debts and accounts of every nature

which are now standing in the name of your complainant or in the name of

the respondent and that to the degree that this request will be re-

vised. And your complainant further prays that she be given the right

to receive a portion of the property and your complainant further prays

that all attorney fees, court costs and any other expense that might be

attached to this process may be taxed as part of the court costs against

the respondent and that your honor will give and grant unto her and

other parties, defendant, defendant and/or counsel referred to in each of

and good conduct certified to relative, and as is duly proved and will

ever pray.

*Filed June 3, 1929  
R. S. Dwyer, Register  
By - [Signature]*

*Bill of Complaint*

RECORDED

[Faint, mostly illegible text and stamps at the bottom of the page, including what appears to be a court seal and various administrative markings.]

OFFICE

IN THE CIRCUIT COURT OF  
SALVADOR COUNTY, ARIZONA.

Case No. 1000, Defendant, Respondent in the above styled cause

and for answer to the bill of complaint says that he admits paragraph

One thereof, he admits paragraph two thereof, and he admits paragraph

Three thereof and demands a return of the same and interest thereon

Paragraph four of the bill of complaint.

Respondent hereby waives service and notice and demand

for oral examination of the complainant's witnesses and for

production of same testimony, notice of the time and place of the

taking of the same and of the right to cross examine or introduce

evidence in his own behalf; and he further consents that the same may

be admitted for final decree at any time on the reading of the

complainant's evidence as noted by the register.

The Respondent hereby requests of this Honorable Court that

he be given the right to carry again if he so desires upon the issuance

of this final decree.

WITNES:

*[Signature]*  
Attorney General

*[Signature]*  
Respondent

RECORDED

*[Handwritten mark]*

*Filed June 3, 1912  
R. S. Smith, Register  
By - Judicial Department  
[Signature]*

RECORDED

NO.

The State of Alabama

BALDWIN COUNTY

CIRCUIT COURT

BERDELLA C. GOODEN

Complainant

vs.

B. B. GOODEN

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

APPROVED AND FORWARDED:  
CIRCUIT CLERK

RECORDED

Amended Petition

OFFICE OF THE CLERK OF THE SUPREME COURT

RECEIVED

THE STATE OF CALIFORNIA, )  
COUNTY OF SAN FRANCISCO, )  
vs. )  
THE CALIFORNIA RAILROAD )  
COMMISSION. )

OFFICE OF THE CLERK OF THE SUPREME COURT

Filed July 6, 1939

R.S. Smith, Register

THE STATE OF CALIFORNIA, )  
COUNTY OF SAN FRANCISCO, )  
vs. )  
THE CALIFORNIA RAILROAD )  
COMMISSION. )

THE STATE OF CALIFORNIA, )  
COUNTY OF SAN FRANCISCO, )  
vs. )  
THE CALIFORNIA RAILROAD )  
COMMISSION. )

THE STATE OF CALIFORNIA, )  
COUNTY OF SAN FRANCISCO, )  
vs. )  
THE CALIFORNIA RAILROAD )  
COMMISSION. )

THE STATE OF CALIFORNIA, )  
COUNTY OF SAN FRANCISCO, )  
vs. )  
THE CALIFORNIA RAILROAD )  
COMMISSION. )

DEPOSITED FOR RECORD

STATE OF NEW YORK

IN SENATE,  
January 1, 1939.

REPORT OF THE COMMISSIONERS OF THE STATE DEPARTMENT OF SOCIAL SERVICES, CONCERNING THE PROGRESS OF THE STATE DEPARTMENT OF SOCIAL SERVICES IN THE YEAR 1938.

ALBANY: THE UNIVERSITY OF THE STATE OF NEW YORK PRESS, 1939.

*Answer to Amended Bill*

RECORDED

*Filed July 6, 1939  
R.S. Dutch, Register*



(Original)

RECORDED

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

**The State Of Alabama**  
Baldwin County

In Circuit Court, In Equity

BERDELLA C. GOODEN,

vs. Complainant.

B. E. GOODEN,  
Respondent.

**DIVORCE DECREEE**

Filed this 11 day of  
July, 1939.

*R. S. Paulk*  
REGISTER.

*By - Nellie Thompson, Deputy*

The parties to the above captioned case have appeared before me and have acknowledged to me the execution of the foregoing instrument and have sworn to the truth of the contents thereof.

I have advised the parties of their rights and of the effect of the foregoing instrument and they have declared that they understand the same and that they execute the same voluntarily and without any fraud, duress, or coercion.

I have advised the parties of their rights and of the effect of the foregoing instrument and they have declared that they understand the same and that they execute the same voluntarily and without any fraud, duress, or coercion.

I have advised the parties of their rights and of the effect of the foregoing instrument and they have declared that they understand the same and that they execute the same voluntarily and without any fraud, duress, or coercion.

I have advised the parties of their rights and of the effect of the foregoing instrument and they have declared that they understand the same and that they execute the same voluntarily and without any fraud, duress, or coercion.

I have advised the parties of their rights and of the effect of the foregoing instrument and they have declared that they understand the same and that they execute the same voluntarily and without any fraud, duress, or coercion.

I have advised the parties of their rights and of the effect of the foregoing instrument and they have declared that they understand the same and that they execute the same voluntarily and without any fraud, duress, or coercion.

The State of Alabama }  
Baldwin County }

Circuit Court of Baldwin County, Alabama,  
(In Equity)

BERDELLA C. GOODEN

COMPLAINANT

VS.

B. B. GOODEN

RESPONDENT

I, Virginia E. Crenshaw

as Register and Commissioner

have called and caused to come before me Berdella C. Gooden, and Harold Yates

witnesses named in the requirement for Oral Examination, on the 3 day of June

1939, at the office of Orvis M. Brown

in Robertsdale, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Berdella C. Gooden and

Harold Yates

doth depose and say as follows:

TESTIMONY OF COMPLAINANT, BERDELLA C. GOODEN

My name is Berdella C. Gooden. I am a resident of Fairhope, Alabama which is in Baldwin County and have been for the past seven years and I am the wife of B. B. Gooden who is the Respondent in this cause of action. We are both over the age of twenty one years and were married at Pinckney, Michigan on September 1st, 1931 and after that time we moved to Fairhope which is located in Baldwin County, Alabama and we have lived here since that time with the exception of a few months when we lived in Mobile. We were separated on April 20th, 1939 or thereabouts, which is this year but for the past two years we have not gotten along together very well and at times we have been separated but we got our difficulties ironed out temporarily but it seems that it has been impossible to get them straightened out at this time. During our marriage especially during the past two years the Respondent B. B. Gooden who is my husband has not contributed to my support in the manner that a man of his station in life should. He is an able bodied man, strong and able to work but he has neglected, failed and refused to support me in the manner that is necessary for my maintenance taking into consideration my station in life and society. Since our separation on April 20, 1939 he has not contributed to my support in any manner whatsoever and though I have often requested that he contribute to my support he has neglected, failed and refused to do so at all times.

There were no children born of this marriage to us.

I am not employed and have no means whereby to pay the costs and expense of this divorce proceeding and I feel that the Respondent being an able bodied man capable of working and earning money, that all the costs and expenses of this proceeding should be taxed on him as I have no means by which to pay any portion of the same whatsoever. At this time we have considerable debts and some of these debts and accounts are in my name personally. I feel that he should be made responsible for all these debts the ones listed in his name and the ones listed in my name also as he is capable of earning money and paying the same and the same if left on me would

ORAL EXAMINATION

I, Virginia E. Crenshaw as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness<sup>es</sup> and read over to them and they signed the same in the presence of myself and Orvis M. Brown at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness<sup>es</sup> or had proof made before me of the identity of said witness<sup>es</sup>; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 3rd day of June 19 39.

Virginia E. Crenshaw (L. S.)

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

BERDELLA C. GOODEN

COMPLAINANT

VS.

B. B. GOODEN

RESPONDENT

ORAL DEPOSITION

Filed June 3, 1939

R. S. Daulton, Register.

RECORDED IN

\_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

\_\_\_\_\_ Register

be a burden on me to pay the same.

Berdella C. Gooden

TESTIMONY OF HAROLD YATES

My name is Harold Yates. I am a resident of Fairhope, Alabama in Baldwin County and have been since 1931. I am personally acquainted with both Berdella C. Gooden and B. B. Gooden, the Complainant and Respondant in this cause. I know that they are both over the age of twenty one years and I have known them since about 1932. They have resided in Fairhope, Alabama practically all of this time with the exception of a few months when they lived in Mobile. I know of my own personal knowledge that for the past two years they have <sup>not</sup> gotten along together so well and have been separated from time to time during the last two years next preceding this date and were separated again on or about April 20th, 1939 and have continued to be separated since that date. Mrs. Gooden told me that she did not intend to go back to and live with the Respondent B. B. Gooden since their separation in April he had contributed to her support not an amount which is required for a person holding her station in life. During the past two years the Respondent has contributed practically nothing to her individual support taking into consideration the necessities required for a person occupying her station in life and the necessities required by society. I am personally acquainted with B. B. Gooden and know that he is an able bodied man able to work and support his wife. Since the time that I have been knowing the Goodens there has not been born to them any children. The Complainant, Berdella C. Gooden does not have any means of support or any means whereby she can pay the costs and expenses of this proceeding and I know that the Respondent B. B. Gooden is an able bodied man and can take care of the expenses of the same.

Harold Yates

**RECORDED**

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

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

BERDELLA C. GOODEN

VS.

B. B. GOODEN

**NOTE OF TESTIMONY**

Filed in Open Court this 22<sup>nd</sup>

day of June July, 1939

R. S. Dorch

REGISTER

Dorch

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

**The State of Alabama,**

Baldwin County.

**CIRCUIT COURT, IN EQUITY**

**BERDELLA C. GOODEN**

Vs.

**B. B. GOODEN**

**REQUEST FOR DECREE IN  
VACATION**

Filed June 3, 1939

*R. S. Duval*

Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

**ORAL EXAMINATION.**

---

I, Virginia Crenshaw, as Register and Commissioner hereby certify that the foregoing deposition ~~s~~ on Oral Examination was taken down in writing by me in the words of the witness<sup>es</sup> and read over to them and they signed the same in the presense of myself and Orvis M. Brown at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness<sup>es</sup> or had proof made before me of the identity of said witness<sup>es</sup>; that I am not of counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 26 day of June 1939

Virginia Crenshaw (L. S.)

STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. \_\_\_\_\_ Term, 193\_\_\_\_\_

BERDELLA C. GOODEN

, Complainant

Vs.

B. B. GOODEN

, Defendant

To R. S. Duck, 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 Orvis M. Brown,

\_\_\_\_\_ 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.

  
Solicitor for Complainant.



BERDELLA C. GOODEN

vs.

B. B. GOODEN

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 and Waiver, Request for Decree in Vacation and Testimony of

Berdella C. Gooden and Harold Yates and E. H. Gooden; Amended  
Petition;

and in behalf of Defendant upon Answer and Waiver; Answer and Waiver to Amended  
Bill of Complaint;

*R. S. Puck*

Register.

*By - Wallace Shugart*  
Deputy

The State of Alabama,  
Baldwin County.

} Circuit Court of Baldwin County, Alabama  
(In Equity.)

BERDELLA C. GOODEN

Complainant.

VS.

B. B. GOODEN

Respondent.

I, Virginia Crenshaw

as Register and Commissioner

have called and caused to come before me Berdella C. Gooden and E. H. Gooden

witnesses named in the Requirement for Oral Examination, on the 26 day of June

1939, at the office of Orvis M. Brown

in Robertsdale, Alabama, and having first sworn said witnesses to speak the truth, the whole truth, and nothing but the truth, the said Berdella C. Gooden and E. H. Gooden doth depose and say as follows: