

BURNETTA LONG.

Complainant

IN THE CIRCUIT COURT OF

VS

BALDWIN COUNTY, ALABAMA.

ROBERT F. LONG.

IN EQUITY.

Respondent.

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

Comes your Complainant, Burnetta Long, and humbly complaining against the Respondent, Robert F. Long, respectfully represents and shows unto your Honor and this Honorable Court as follows:

FIRST: That your Complainant and the Respondent are both over the age of twenty one years and that your Complainant is a resident of Baldwin County , and the Respondent resides at Bon Secour, Alabama in Baldwin County, Foley Star Route.

SECOND: That your Complainant and the Respondent were married at Laurel, Mississippi, on, to-wit: July 10th, 1921 and lived together as husband and wife until July 1st, 1938.

that on to-wit: July 1st, 1938 and various times prior thereto, the Respondent has cursed, abused and threatened the Complainant; that on, to-wit: July 1st, 1938 he did actual violence to her person by striking her; that his conduct is such that 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 health.

FOURTH: Complainant further shows unto this Honorable Court that the Respondent has not and does not contribute to her support, that he is an able bodied man capable of working and supporting his wife, but that he has and does fail to contribute to her support, and that the Respondent has property and means whereby he could support your Complainant if he would do so.

FIFTH: That there were no children born to your Complainant and the Respondent of this marriage.

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said Robert F. Long party respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by

law and the practice of this Honorable Court,

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, Robert F. Long, and Complainant further prays that the cost of this proceeding including attorneys fees be taxed against the Respondent and that your Complainant be given the right to marry again should she so desire; 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.

Burning Tong.
Complainant

FOOTNOTE: The Respondent, Robert F. Long, is required to answer each and every allegation contained in the foregoing complaint, paragraphs numbered one to five inclusive, but not under eath, eath being hereby expressly waived.

Burnetta Long.

ADDITIONAL TESTIMONY OF HENRY LONG

My name is Henry Long. I am the same party who gave the testimony in this case of Burnetta Long vs Robert F. Long, the latter who is my brother. It was with these parties when they were married in Laurel, Mississippi in July of 1921 and I know that they separated on July 1st, 1938 and that the Complainant, Burnetta Long, has remained separate and apart from the Respondent since that time and refuses to return to live with him. I was with them when they lived here in Baldwin County, Alabama and also when they were separated and know that they both had a temper which was very high and often times when I was present they would get into quarrels and scrap among themselves. Often times while I was there the Respondent Robert F. Long cursed, abused and threatened his wife Burnetta Long and on the day they separated he struck her several times about the face and threatened to do her bodily harm. His conduct has been such that she has every reason to believe and does believe that if she continues to live with him he will carry out his threats to do her further violence and probably severely beat her w I know of my own personal knowledge often times when they would have these quarrels that he would strike her the same as he did this day on which they separated.

Henry Long.

TESTIMONY OF NORA LORD.

My name is Nora Lord. I am a resident of Baldwin County, Alabama and have been for the past fifteen years and longer and have been living near both of these parties when they lived together as husband and wife for a long period of time. I know while they lived together that they quarreled and fussed often and often times he would slap her on the face and knock her about and threaten her life and I know of my own personal knowledge that on the date of their separation July 1st, 1938 that Robert F. Long struck the Defendant Burnetta Long and threatened her at which time she left him and has remained separate and apart from him since that time and refused to return to live with him. I know that there were no children born to them of this marriage and further that they are both over the age of twenty one years and that the Respondent does not contribute to the support of the complainant and Complainant stated that she was afraid to live/or return to the Respondent, Robert F. Long. Nara Lard-

BURNETTA LONG,

Complainant

ROBERT F. LONG,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Comes Robert F. Long, 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 and Four of this Bill of Complaint and demands strict proof thereof, and he further admits Paragraph Five of the Bill of Complaint.

Respondent hereby waives service and notice of and damand for oral examination of the Complainant's witnesses, of the issue of commission 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 Robert Fulton Long of this final decree.

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THE STATE OF ALABAMA, Baldwin County

Witness' Fees, \$_

CIRCUIT COURT

TO VIRGI	NIA E. CRENSHAW:			
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KNOW YE: That we,	having full faith in your pru	idence and com	petency, have appo	inted you Commis-
sioner, and by these prese	nts do authorize you, at su	ich time and pla	ace as you may app	ooint, to call before
	Burnetta Long a			
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as witnesses in behalf of —	the Complainant,		in a cause per	nding in our Circuit
G . (P.1) . G .	of said State, wherein ——	BURNETTA I	LONG.	
Court of Baldwin County,	or said State, wherein ———			
			is	Complainant
				Complamant
and RO	BERT F. LONG,			
				is Defendant
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to take and contifue the done	osition_S of the witness [©] S	and return	the same to our C	ourt with all Con-
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venient speed, under your	hand.			
Witness10th	day of		, 19_39	
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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

			——— Complainant
		VS.	
	ROBERT F.	Long	Respondent
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TOTE EVIPILITE DELMEEU	ered, adjudged and the Complainant etta Long	d decreed by the Court and Defendant be, and	t that the bonds of matrimony he the same are hereby, dissolved, a
forever divorced from	n the said		
Robe	rt F. Long		
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Respondent.

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The Respondent hereby requests of this Henoreble Pour total residence to be given the transmost this final decree.

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ORAL DEPOSITION

THE STATE OF ALABAMA)
BALDWIN COUNTY

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

IN EQUITY

BURNETTA LONG,

Complainant

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ROBERT F. LONG,

Respondent

I, Virginia Crenshaw, as Register and Commissioner have called and caused to come before me Henry Long and Nora Lord, witnesses med in the Requirement for Oral Examination, on the 24th 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 witnesses deth depose and say as follows:

		THE STATE OF ALABA
BURNETTA LONG	· · · · · · · · · · · · · · · · · · ·	_ Baldwin County
VS.		
ROBERT FL LONG		_ IN EQUITY
		_ Circuit Court of Baldwin Cou
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R.S. Duck
Register.
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The	State of Alabama BALDWIN COUNTY
Circui	IN EQUITY t Court of Baldwin County
:	
	BURNETTA LONG
	vs.
	ROBERT F. LONG
N(OTE OF TESTIMONY
Filed i	n Open Court this #### 6th
day of	July 193 9
	R.S. Duch
	REGISTER

The	State of)f	Alabama	(
	Baldwin	С	ounty)

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

	BURNETTA LONG	COMPLAINANT
	vs.	
	ROBERT F. LONG	RESPONDENT
I	Virginia E. Crehshaw	
·	and Commissioner	
	nd caused to come before meBurnetta	
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witness_ es na	amed in the requirement for Oral Examina	tion, on the <u>10th</u> day of <u>June</u>
193 <mark>9</mark> , at the	e office of Orvis M. Brown	
in Robertsd	ale, , Alabama, and havi	ing first sworn said witness es to speak the
truth, the who	ole truth, and nothing but the truth, the	said Burnetta Long and Henry Long
	doth	depose and say as follows:

TESTIMONY OF BURNETTA LONG

My name is Burnetta Long. I am the Complainant in this cause of action. Robert F. Long and myself were married in Laurel, Mississippi on July 10th, 1921 and lived together as husband and wife until July 1st, 1938 at which time we were separated and at which time we resided at Bon Secour, Alabama in Baldwin County. We are both over the age of twenty one years and were at the time we separated. The Respondent is a man of ungovernable temper and has at all times been so. We tried to live together and did as long as we could but I could not put up further with things as they were at home and it became necessary that I leave in order to protect my life and health. The Respondent is a man who is financially able to pay the expense of this procedure and I ask this court that this cost be taxed on him. There were no children born to us of this marriage.

· Bresnette son

I, Virginia E. Crenshaw	as Register and Commissioner hereby certify
that the foregoing deposition s on Oral Examine	ation was taken down in writing by me in the words
of the witnesses and read over tothem	and they signed the same in the presence of
myself and Orvis M. Brown	
at the time and place herein mentioned; that I h	nave personal knowledge of personal identity of said
witness es or had proof made before me of t	he identity of said witness es; that I am not of
counsel or of kin to any of the parties to said car	use, or any manner interested in the result thereof.
I enclose the said Oral Examination in an	
Given under my hand and seal, this 10	th day of June 19 39.
	<u>Uirgina E. Crenshau</u> (L. S.)
Vol.	
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	STATE OF BALDWIN COURT IRCUIT COURT WS. ROBERT F. LON
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TESTIMONY OF HENRY LONG

My name is Henry Long. I am a resident of Baldwin County, State of Alabama, Foley, Alabama, and have been living there about four years. The Respondent in this cause, Robert F. Long, is my brother. E was present at Laurel, Mississippi in July of 1921 when he married the Complainant Burnetta Long and I know that they lived together as husband and wife in Baldwin County, Alabama until about July 1st, 1938. I know of my own personal knowledge that they are both over the age of twenty one years and that there were no children born to them of this marriage. My brother Robert F. Long is a man who is financially able to pay the expenses of this proceeding as he is an able bodied man and making a decent salary. I was around both of these parties while they lived herein Baldwin County and know that they both had somewhat of an ungovernable temper and there was no great deal of effort put forth on the part of either party to govern the situation but under the circumstances I am not trying to justify either one of the parties to this action but probably if my brother had somewhat governed his temper they could have lived together. My brother has not contributed to her support in any manner since they were separated in July Henry Long.