

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.

THIRD: That the Respondent is a man of ungovernable temper; 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.

The Complainant further prays that upon 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, 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.

Burnetta Long
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 oath, oath being hereby expressly waived.

Burnetta Long
Complainant

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. I 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 up 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
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^{with} or return to the Respondent, Robert F. Long.

Nora Lord
Nora Lord

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 Burnetta Long and Henry Long and Nora Lord

as witnesses in behalf of the Complainant, in a cause pending in our Circuit Court of Baldwin County, of said State, wherein BURNETTA LONG,

is Complainant

and ROBERT F. LONG,

is Defendant,

on oath to be by you administered, upon them

to take and certify the deposition of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 10th day of June, 19 39.

R. S. Dush

REGISTER

Commissioner's Fee \$

*By - Nankie Thompson
Deputy Register*

Witness' Fees, \$

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BURNETTA LONG

Complainant

VS.

ROBERT F. LONG

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decress Pro Confesso on _____ 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 Burnetta Long is forever divorced from the said

Robert F. Long

for and on account of cruelty and non-support

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 both Burnetta Long and Robert F. Long be, and are hereby permitted to again contract marraige upon the payment of the cost of this suit.

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

This 8th day of July 19 39.

F. W. Hare
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.

law and the practice of this honorable court.

The Complainant further prays that upon the final hearing

of this cause, that this honorable court will give and grant unto her a

decree of absolute divorce, heretofore bearing the hands of matrimony existing

between her and the Respondent, Robert T. Long, and Complainant further

prays that the said Respondent be held liable for all the expenses incurred by her

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 every other, further, different and/or general relief as she may be

in this case and your Complainant is entitled to receive and is in this court and

will ever be

RECORDED

Bill of Complainant

*Filed June 19, 1939
R. S. Dunch, Register
By: [Signature]*

Complainant

Respondent, Robert T. Long, is required to answer within and

every allegation contained in the foregoing complaint, paragraphs numbered

one to five inclusive, but not under oath, each being hereby expressly

sworn.

Complainant

(ORIGINAL) RECORDED

No. Page

The State Of Alabama
Baldwin County

In Circuit Court, In Equity

BUENAVISTA LONG
vs. Complainant.

ROBERT F. LONG
Respondent.

DIVORCE DECREE

Filed July 11, 1939
R. S. Smith, Reporter
By - W. L. Thompson, Deputy

BURNETTA LONG

VS.

ROBERT F. LONG

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
 Burnetta Long and Henry Long, and NORA LORD,

and in behalf of Defendant upon Answer and Waiver

R.S. Ditch
 Register.
By - Nellie Thompson,
 Deputy

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

BURNETTA LONG

VS.

ROBERT F. LONG

NOTE OF TESTIMONY

Filed in Open Court this ~~###~~ 6th

day of ~~#####~~ July 193 8

R. S. Duch
REGISTER

By - Charles Thompson
Deputy

The State of Alabama }
Baldwin County

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

BURNETTA LONG

COMPLAINANT

VS.

ROBERT F. LONG

RESPONDENT

I, Virginia E. Crehshaw

as Register and Commissioner

have called and caused to come before me Burnetta Long and Henry Long

witness es named in the requirement for Oral Examination, on the 10th day of June

1939, at the office of Orvis M. Brown

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

truth, the whole 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.

Burnetta Long

ORAL EXAMINATION

I, Virginia E. 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^{es} 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^{es} or had proof made before me of the identity of said witness^{es}; 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 10th day of June 19 39.

Virginia E. Crenshaw (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

BURNETTA LONG

COMPLAINANT

VS.

ROBERT F. LONG

RESPONDENT

ORAL DEPOSITION

Filed June 10, 1939

R. S. Duck, Register.

By Virginia E. Crenshaw RECORDED IN Equity Record

Vol. _____ Page _____

_____, Register

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. I 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 of 1938.

Henry Long.