

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

Comes DAVID STEPHENSON, and humbly complaining against  
SABREA STEPHENSON, respectfully represents and shows unto your  
Honor as follows:

FIRST:

That your complainant, DAVID STEPHENSON, and SABREA STEPHEN-  
SON, the defendant, are each over the age of twenty-one years, and  
both reside in the Town of Fairhope, Baldwin County, Alabama; that  
they have lived in Baldwin County for more than five (5) years next  
preceding the filing of this bill of complaint.

SECOND:

That your complainant and the said defendant were married  
in Fairhope, Baldwin County, Alabama, twenty-two years ago and lived  
together as husband and wife until about eight weeks ago; that some-  
time in the latter part of June, 1939, the said defendant, Sabrea  
Stephenson, committed acts of adultery with a man whose name to your  
complainant is unknown; that the said acts of adultery were without  
the consent or approval of your complainant, and that he has not con-  
doned said acts; that your complainant is informed and believes that  
the defendant is now living in adultery with said person in Baldwin  
County, Alabama.

WHEREFORE, your complainant prays that this Honorable Court  
will take jurisdiction of the cause made by this bill of complaint,  
and by appropriate process make the said Sabrea Stephenson party de-  
fendant hereto, and require her to plead, answer or demur to this  
bill of complaint within the time and under the penalties prescribed  
by law and the practice of this Honorable Court, and your complainant  
further prays that upon a final hearing of this bill of complaint your  
Honor will make and enter a decree forever dissolving the bonds of  
matrimony existing between your complainant and the said defendant.  
And your complainant prays for such other, further or different re-

lief as in equity and good conscience he may be entitled to receive.

Beebe Hall + Beebe  
Solicitors for Complainant.

FOOT NOTE:

The defendant is required to answer each and every allegation contained in this bill of complaint, Paragraphs FIRST to SECOND inclusive, but not under oath, oath being hereby expressly waived.

Beebe Hall + Beebe  
Solicitors for Complainant.

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*Beebe Hall & Beebe*  
Solicitors for Complainant.

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*Beebe Hall & Beebe*  
Solicitors for Complainant.

FILED IN COURT  
*[Signature]*  
CLERK

FILED JAN 11 1938

FILED IN COURT

DEFENDANT'S ANSWER

BY

FILED IN COURT

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

Sabrea Stephenson

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

David Stephenson

against said Sabrea Stephenson

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, Robert S. Duck, Register of said Circuit Court, this 14th day of August 1939

R. S. DUCK  
Clerk  
By *Raylor Wilkins*  
Deputy Register

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

THE STATE OF ALABAMA, }  
Baldwin County }

CIRCUIT COURT

TO IDA M. TURNBULL

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 David Stepenson, and

as witnesses in behalf of complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein DAVID STEPHENSON

Complainant  
and SABREA STEPHENSON

Defendant,  
on oath to be by you administered, upon him

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

Witness 25th day of September, 1939, 19

R. S. Douch

REGISTER

Commissioner's Fee \$

Witness' Fees, \$

# CHANCERY EXECUTION

## BILL OF COSTS

No. 561 - David Stephenson, vs. Sabra Stephenson, Plaintiff  
Complainant Defendant

FEES OF REGISTER	Dollars	Cents	Brought Forward .....	\$ <u>4</u> <u>60</u>
Filing each bill and other papers .....	4	40	For Receiving, keeping and paying out or distributing money, etc.; 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.	
Issuing each subpoena .....		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.	
Issuing each copy thereof .....		40	Each notice sent by mail to creditor ..	15
Entering each return thereof .....		15	Filing, receipting for and docketing each claim, etc.	25
For each order of publication .....	1	00	For all entries on subpoena docket, etc.	50
Issuing writ of injunction .....	1	50	For all entries on commission docket, etc.	50
For each copy thereof .....		50	Making final record, per 100 words .....	15
Entering each return thereof .....		15	Certified copy of decree .....	1 00
Issuing Writ of Attachment .....	1	00	Report of divorce to State Health Office (Acts 1915)	50
Entering each return thereof .....		15	Total Fees of Register .....	<u>4 60</u>
Docketing each case .....	1	00	FEES OF SHERIFF	
Entering each appearance .....		25	Serving and returning subpoena on deft. \$1	50
Issuing each decree pro confesso on per. ser.	1	00	Serving and returning subpoena for witness .....	65
Issuing each decree pro confesso on publica.	1	00	Levying attachment .....	3 00
Each order appointing guardian .....	1	00	Entering and returning same .....	25
Any other order by Register .....		50	Selling property attached .....	
Issuing commission to take testimony .....		50	Impaneling Jury .....	75
Receiving and filing .....		10	Executing writ of possession .....	2 50
Endorsing each package .....		10	Collecting execution for costs .....	1 50
Entering order submitting cause .....		50	Serving and returning sci. fa., each .....	65
Entering any other order of court .....		25	Serving and returning notice .....	65
Noting all testimony .....		50	Serving and returning writ of injunction	1 50
Abstract of cause, etc. ....	1	00	Serving and returning writ of exeat .....	1 50
Entering each decree .....		75	Taking and approving bonds, each .....	75
For every 100 words over 500 .....		15	Collecting money on execution .....	
Taking account, etc. ....	3	00	Making deed .....	2 50
Taking testimony, etc. ....		15	Serving and returning application, etc.	1 00
Each report, 500 words or less .....		2 50	Serving attachment, contempt of court	1 50
For every 100 words over 500 .....		15	Total Fees of Sheriff .....	<u>3 00</u>
Amount claimed less than \$500, etc. ....	2	00	RECAPITULATION	
Issuing each subpoena .....		25	Register's Fees .....	2 60
Witness certificate, each .....		25	Sheriff's Fees .....	3 00
Issuing execution, each .....		75	Commissioner's Fees .....	<del>5 00</del>
Entering each return .....		15	Solicitor's Fees .....	
Taking and approving bond, each .....	1	00	Witness Fees .....	
Making copy of bill, etc. ....		15	Guardian Ad Litem .....	
Each notice not otherwise provided for ..		50	Printer's Fees .....	
Each certificate or affidavit, with seal ..		50	Trial Tax .....	3.00
Each certificate or affidavit, no seal .....		25	Recording Decree in Probate Court .....	
Hearing and passing on application, etc.	3	00	Total .....	<u>14 60</u>
Each settlement with receiver, etc .....	3	00		
Examining each voucher of Receiver, etc.		10		
Examining each answer, etc. ....	3	00		
Recording resignation, etc. ....		75		
Entering each certificate to Supreme Court		50		
Taking questions and answers, etc. ....		25		
For all other ser relating to such proceedings	1	00		
For services in proceeding to relieve minors, etc., same fee as in similar cases.				
Commission on sales, etc: 1st \$100, 2 per ct.; all over \$100 and not exceeding \$1,000, 1 1-2 per ct: all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct.				
Sub Total Carried Forward .....	4	60		

**The State of Alabama,** { No. 561  
Baldwin County. Circuit Court, In Equity June Term, 1930

To Any Sheriff of the State of Alabama—GREETING:  
 You are hereby commanded, That of the goods and chattels, lands and tenements of

David Stephenson Defendant

you cause to be made the sum of \$ 14.60 Dollars,  
 which \_\_\_\_\_ Plaintiff

recovered of \_\_\_\_\_ on the 11 day of April 1930  
 by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of \_\_\_\_\_ Dollars,

costs of suit, and have the same to render to the said \_\_\_\_\_  
 and make return of this Writ and the execution thereof, according to law.

Interest from \_\_\_\_\_ 1930 to date of collection.

Witness my hand, this 15 day of June 1930  
R.S. Duck, Register.

# The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

David Stephenson, Complainant

VS.

Sabrea Stephenson, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decress Pro Confesso on personal service 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 David Stephenson is forever divorced from the said

Sabrea Stephens on

for and on account of adultery

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 David Stephenson be, and he is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that David Stephenson the complainant pay the cost herein to be taxed, for which execution may issue.

This 11<sup>th</sup> day of April, 1940

F. M. Fare  
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.



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

**The State Of Alabama**

Baldwin County

In Circuit Court, In Equity

vs. Complainant.

Respondent.

**DIVORCE DECREE**

*Filed April 11, 1940  
R.S. Ditch, Register*

*[Faint, mostly illegible text, likely the body of the divorce decree]*

JUN 15 1940

No. 561

The State of Alabama,  
Baldwin County.

Circuit Court, In Equity.

David Stephens

Complainant

vs.

Sublime Stephens

Respondent

CHANCERY EXECUTION  
Fi. Fa.

\$ 14.60

Total \$ 14.60

Fee Book *Consolidated* Page 561

Execution Docket " " Page " "

*J. L. Beck*  
Complainant's Solicitor.

The State of Alabama,  
Baldwin County.

ha..... duly waived ..... right  
to the exemption of personal property as to  
the collection of the debt for which this execu-  
tion is issued.

Register.

Received in office this 15

day of June 1940

*W. A. Stewart*  
Sheriff

Execution Docket..... Page.....

*Returned August 30, 1940*

*No property of the  
debtor held in  
Baldwin County  
W. A. Stewart Sheriff*

MOORE PRINTING CO., BAY MINNIE, ALA.

The State of Alabama, }  
Baldwin County.

By virtue of the within execution I have levied

Series of horizontal lines for recording details of the execution process.

NO. \_\_\_\_\_

**THE STATE OF ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

Complainant \_\_\_\_\_

VS.

Defendant \_\_\_\_\_

**Commission To Take Deposition**

**COMMISSIONER:**

**Witnesses:**

*Chavis*

Sabrea Stephenson

Serve on

Circuit Court of Baldwin County  
IN EQUITY

No.

SUMMONS

David  
~~Sabrea~~ Stephenson

Complainant,

vs.

Sabrea Stephenson,

Defendant.

Beebe, Hall and Beebe.

Solicitor for Complainant

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this 8-14 day of \_\_\_\_\_, 1939

*W. R. Stewart*  
SHERIFF

Executed this 8 day of

Aug 1939  
by leaving a copy of the within Summons with

*Sabrea Stephenson*  
*Sabrea*

Defendant

*W. R. Stewart*  
Sheriff

By *B. H. Greene*  
Deputy Sheriff

The State of Alabama }  
Baldwin County

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

David Stephenson, COMPLAINANT

vs.

Sabrea Stephenson, RESPONDENT

I, Ida M. Turnbull,

as Register and Commissioner

have called and caused to come before me David Stephenson

witness .. named in the Requirement for Oral Examination, on the 25 day of September

1939, at the office of the Register

in Bay Minette, Alabama, and having first sworn said witness.... to speak the

truth, the whole truth, and nothing but the truth, the said

David Stephenson doth depose and say as follows:

My name is David Stephenson. I am forty-nine years old and live in Fairhope, Baldwin County, Alabama. I have been a resident of Baldwin County, Alabama, all my life. I married Sabrea Stephenson on or about the 7th of April, 1915, in Fairhope, and we lived together as husband and wife in Fairhope until in 1932, when I had a stroke of paralysis and we continued to live in the same house, but not as husband and wife, until about five months ago, when she moved away voluntarily. About a year ago, while she was still living in the same house with me, but in different rooms, a man, whose name is Ernest, but I don't know what his last name is, would come to my house and go in the room that my wife occupied and get into bed with my wife and commit acts of adultery. This went on for several months, and on account of my condition as a paralytic I was unable to ~~order~~ order him out of the house, but I never condoned the acts of adultery committed by my wife and this negro Ernest. He would come there practically every other night and spend the night and commit acts of adultery. For the past five months she has been living in a house owned by her sister and this negro Ernest continues to call on her and I have seen him go there in the evenings and spend the night and leave the next morning. Throughout the whole time my wife has been untrue to me I have never condoned or forgiven her for her infidelity.

David Stephenson

ORAL EXAMINATION

I, Ida M. Turnbull, ~~XXXXXXXXXX~~ 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... and read over to him and he signed the same in the presence of myself and J. P. Beebe at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ... or had proof made before me of the identity of said witness ... ; 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 25th day of September 19 39.

Ida M. Turnbull (L. S.)

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

**The State of Alabama**  
**BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

\_\_\_\_\_

COMPLAINANT

vs.

\_\_\_\_\_

RESPONDENT

**ORAL DEPOSITION**

Filed Sept 25, 1939

R. S. Beebe, Register

RECORDED IN

\_\_\_\_\_ Record

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

\_\_\_\_\_ Register