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CAESAR WEBB,
Complainant,
VS.
ROSA ROACH WEBB,
Respondent.

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

BILL FOR DIVORCE.

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

Comes your Complainant, CAESAR WEBB, and, humbly com-
plaining against the Respondent, ROSA ROACH WEBB, respectfully
represents and shows unto your Honor the following facts as the
basis for the relief hereinafter prayed:

1. That both your Complainant and the Respondent are
over the age of twenty-one years; that both are residents of
Bay Minette, Baldwin County, Alabama, and have been for more
than three years next preceding the filing of this Bill of
Complaint; that your Complainant and the Respondent are husband
and wife, having intermarried at Letohatchee, Alabama, on, to-wit:
the 31st day of October, 1921.

2. That your Complainant and the Respondent lived to-
gether as man and wife at Bay Minette, Baldwin County, Alabama,
until, to-wit, July 15, 1934; that, on, to-wit, the 15th day of
July, 1934, the Respondent voluntarily abandoned your Complainant
and has refused to live with him as his wife since that time, and
that the said abandonment has been continuous for a period of more
than two years next preceding the filing of this Bill of Complaint.

3. That the said Abandonment was without cause, fault
or consent on the part of your Complainant.

THE PREMISES CONSIDERED, your Complainant prays this
Honorable Court will take jurisdiction of the cause made by this
Bill of Complaint, and that the said ROSA ROACH WEBB be made a
party defendant hereto, and by proper process be made to plead,
answer or demur to this Bill of Complaint within the time and un-

der the pains and penalties prescribed by law and the practice of this Honorable Court.

THE PREMISES CONSIDERED, your Complainant further prays that upon a hearing or submission of this cause, a Decree may be rendered in his favor forever divorcing him from the said ROSA ROACH WEBB, and that the bonds of matrimony between himself and the Respondent be dissolved, and that your Honor decree to your Complainant the right to remarry, should he so desire; and if your Complainant has not asked for the proper relief, the premises considered, he prays that the Honorable Court may grant him such further, additional and different relief as to your Honor may seem meet, just and proper in Equity, and your Complainant will ever pray, Etc.

J. A. Mashburn, Jr.
Solicitor for the Complainant.

FOOT-NOTE:

RESPONDENT IS REQUIRED TO ANSWER EACH AND EVERY PARAGRAPH OF THE FOREGOING BILL OF COMPLAINT, FROM "1" THROUGH "3", INCLUSIVE, BUT NOT UNDER OATH, ANSWER THERETO UNDER OATH BEING HEREBY EXPRESSLY WAIVED.

J. A. Mashburn, Jr.
Solicitor for the Complainant.

The State Of Alabama, } Circuit Court of Baldwin County, In Equity.
Baldwin County

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon ROSA ROACH WEBB,

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

CAESAR WEBB

against said ROSA ROACH WEBB,

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, R. S. Duck, Register of said Circuit Court, this 22nd day of September, 1939.

R. S. Duck, Register
By: Harold J. Johnson 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 P. E. TETER

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 Jesse Moorner and Caesar Webb

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein CAESAR WEBB

Complainant
and ROSA ROACH WEBB

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 29th day of September 19 39

R. S. DUCK

clerk, - register

REGISTER

By *Handwritten Signature*
Deputy

COMMISSIONER'S FEE, \$

WITNESS' FEES, \$

CAESAR WEBB,
Complainant,
VS.
ROSA ROACH WEBB,
Respondent.

EQUITY NO. _____
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.

Testimony of JESSIE MOORER for the Complainant.

The said Witness, JESSIE MOORER, being first duly and legally sworn, upon examination by the Solicitor for the Complainant, testified as follows:

"My name is Jessie Moorer and I am over the age of twenty one years. I live at Bay Minette, Alabama. I know Caesar Webb, the Complainant in this cause, and I know that he has lived at Bay Minette, Baldwin County, Alabama, for more than ten years preceding the filing of this Bill of Complaint in this cause.

I know that Caesar Webb was married to Rosa Roach about twelve years ago; that they lived together as man and wife at Bay Minette until about the Fifteenth day of July, 1934; that Rosa Roach Webb then left her husband, Caesar Webb, and has not since that time returned to live with him, but has wholly abandoned him. It is my information and firm belief that her leaving was without cause, fault or consent on the part of Caesar Webb. I know that he has tried to get her to return to him but she has refused."

STATE OF ALABAMA, }
BALDWIN COUNTY. }

I, P. E. Teter, Commissioner in the above styled cause, hereby certify that on the 29th day of September, 1939, I caused the witness, Jessie Moorer, whose name is subscribed to the foregoing noted testimony, to appear before me at my office in Bay Minette, Alabama, where, after being duly and legally sworn, and upon examination by T. J. Mashburn, Jr., Solicitor for the Complainant, he testified as hereinabove set forth; that his testimony was taken down as near as might be in the language of the witness, and that after being written down, was read over and signed by him in my presence. I further certify that I am in noway interested in the result of this suit.

Witness my hand and seal this the 29th day of September, 1939.



Commissioner. (SEAL)

CAESAR WEBB,
Complainant,
VS.
ROSA ROACH WEBB,
Respondent.

EQUITY NO. _____
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.

Testimony of CAESAR WEBB, The Complainant.

The said witness, CAESAR WEBB, being first duly and legally sworn, upon examination by the Solicitor for the Complainant, testified as follows:

"My name is Caesar Webb. I am the Complainant in this cause, and I am over the age of twenty one years. I have been a bona fide resident citizen of the State of Alabama, residing at Bay Minette, Alabama, for more than fifteen years. Rosa Roach Webb, the Respondent in this cause, is a resident of Bay Minette, Baldwin County, Alabama, and is over the age of twenty-one years.

The said Rosa Roach Webb, the Respondent, and I were married at Letchatchee, Alabama, on the 31st day of October, 1921. We lived together as man and wife in Bay Minette, Baldwin County, Alabama, until about the Fifteenth day of July, 1934, when the said Rosa Roach Webb, my wife, left me and voluntarily abandoned my bed and board and has continued to live separate and apart from me from that date, never having returned to live with me. During all of this time, I have been a bona fide resident of this State. The Abandonment and Separation were without cause, fault or consent on my part."

Witness

[Signature]

T. J. Mashburn, Jr.

STATE OF ALABAMA, }

BALDWIN COUNTY. }

[Signature]
Caesar Webb
mark

I, *[Signature]*, Commissioner in the above-styled cause, hereby certify that on the 29th day of September, 1939, I caused the witness CAESAR WEBB, whose name is subscribed to the foregoing testimony, to appear before me at my office in Bay Minette, Alabama, where, after being duly and legally sworn, and upon examination by T. J. Mashburn, Jr., Solicitor for the Complainant, he testified as hereinabove set forth; that his testimony was taken down by me as near as might be in his language, and that after being written down, was read over and signed by him in my presence. I further certify that I am in no way interested in the result of this cause.

Witness my hand and seal this the 29th day of September, 1939.

[Signature] (SEAL)
Commissioner.

CAESAR WEBBB

vs.

ROSA ROACH WEBB

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, _____
the Answer and Waiver of the Respondent, and upon the testimony
of Jesse Moorer and Caesar Webb for the Complainant

and in behalf of Defendant upon the Answer and Waiver of the Respondent

_____ *R. E. Dush* _____
 Register.
 By *Andlice Thompson, Deputy*

CECIL WEBB,
Complainant,
VS.
ROSA ROACH WEBB,
Respondent.

EQUITY NO. _____
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.

ANSWER OF RESPONDENT.

Comes now, ROSA ROACH WEBB, Respondent in the above styled cause, and for answer to the Bill of Complaint filed in said cause, says:

1. That she denies each and every allegation of the said Bill of Complaint, separately and severally.

2. Respondent hereby expressly waives service and notice of demand for oral examination of Complainant's witnesses; of the issue of commission to take testimony; of notice of the time and place set for taking same; of the right to cross-examine Complainant's witnesses; of the right to introduce evidence in her own behalf.

3. She further agrees that the said cause may be submitted for final decree at any time on the pleadings and on Complainant's evidence as noted by the Register.

4. She prays that, if the Honorable Court renders a decree against her as prayed by the Complainant, it will grant her the right to re-marry.

Rosa Roach Webb
Respondent.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Caesar Webb Complainant

VS.

Rosa Roach Webb 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 ~~#####~~ Caesar Webb is forever divorced from the said

~~#####~~ Rosa Roach Webb

for and on account of Abandonment

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 Caesar Webb and Rosa Roach Webb be, and are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Caesar Webb the Complainant pay the cost herein to be taxed, for which execution may issue.

This 6th day of October 1939.

J. M. 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.

out

113B
8-14-37

Serve On _____

Circuit Court of Baldwin County
IN EQUITY

No. 572

Summons

CAESAR WEBB,
Complainant,

vs.

ROSA ROACH WEBB, (23)
Respondent.

Rosa Roach Webb

F. J. MASHBURN, JR.
Solicitor for Complainant

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,
Baldwin County

Received in office this 27

day of Sept, 1937

W. R. Stewart
Sheriff.

Executed this 23rd day of

Sept, 1937

by leaving a copy of the Summons with

Rosa Roach Webb
Defendant

W. R. Stewart
Sheriff

By *[Signature]*
Deputy Sheriff

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

Caesar Webb

vs.

Rosa Roach Webb

NOTE OF TESTIMONY

Filed in Open Court this 6

day of Oct 1939

R. S. Dyer

REGISTER

RECORDED

No. Page

The State Of Alabama
Baldwin County

In Circuit Court, In Equity

Carman Webb
vs. Complainant.

Rosa Resarah Webb

Respondent.

DIVORCE DECREE

Filed Oct. 6, 1939
R. B. DUCK
clerk - register
By *Amelia Thompson*
Deputy

ANSWER OF RESPONDENT.

CAESAR WEBB, 8-144

Complainant,

VS.

ROSA ROACH WEBB,

Respondent.

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

Filed this the 21st day
of September, 1939.

R. S. Wood Circuit Clerk
of Baldwin County, Ala.
By: Max Allen Thompson,
Deputy

Filed September 30, 1939
R. S. Buck, Reporter
By - *Melvin Thompson*
Opney

572

BILL OF COMPLAINT.

CAESAR WEBB,
Complainant,
VS.
ROSA ROACH WEBB,
Respondent.

RECORDED

8-113B

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

Filed this the 21st day
of September, 1939.
R.S. Duck Circuit Clerk
of Baldwin County, Ala.
By: Miss Alice Thompson
T. J. MASHBURN, JR. *Deputy*
LAWYER
BAY MINETTE, ALABAMA