

424

IN THE CIRCUIT COURT, Baldwin COUNTY, IN EQUITY.

Frances Langer Complainant.

vs.

Clemens Langer, Respondent.

I T.W. Richerson,

as

have called and caused to come before me Frances Langer

in Jones & Thack

witness examined in the Requirement for Oral Examination, on the 12th day of February

1924, at the office of Register Bay Minette,

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

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

doth depose and say as follows:

Frances Langer being duly sworn deposes and says: I am over thirty-one years of age, my name is Frances Langer. I am the complainant in the suit of Frances Langer against Clemens Langer for divorce in the Circuit County of Baldwin County, in equity. Defendant and I were married at Chicago in the month of July, 1920, we moved to Baldwin County during the summer of last year, and have lived here ever since. We lived near Robertsdale in Baldwin County. We lived together continuously until Feb. 8th last, when at our home he became enraged at me and cursed and abused me and called me names I cant repeat, he threatend to strike me and said he would Kill me. He has always been high tempered and lately has become worse and hardly ever speaks a kind word to me but is abouse and becomes angry over almost nothing. He has threatend me several times, but never before has he been as violent as he was Feb 8th at night I am afraid to live with him any longer. He is much larger than I am and could kill me and I am afraid he will if I continue to live with him. I have done nothing to cuase his anger. He would get mad with me because I would want to correct his children. I do not know where I will go I am afraid to go back where he is. He has been getting worse for several months, and I have tried to put up with it, but I can't go any farther. I know he will kill me.

Frances Langer

My name is Jonas Giesler I live in Baldwin County, near Robertsdale.

I have have lived there about about fifteen months or longer.

I own property there and have made my home there for that time.

I ~~live~~ know Frances and Clemens Langer. They live about twenty rods from my house. They have lived at this place since last

summer. Yes, I frequently hear their troubles between. ^{them -} She seems

to be a good dutiful wife, and tries to please so far as I can tell.

He is a man of strong temper. They have fusses pretty often and I can hear him from my place cursing and abusing her. I have heard him

threaten her pretty often. He uses about as strong language to her

as a man can use. They I am sure could not live together peaceably

and from his abuse and threats I believe it would be dangerous

for her to go back to him. I don't know what they russed over.

But I heard him after he got under way and I was afraid he was

going to do her ^{body harm} last Friday, February 8th, 1924, at night.

Jonas Giesler

ORAL EXAMINATION.

I, J. M. McKeown, as Register

hereby certify that the foregoing deposition.....on Oral Examination was taken down in writing by me in the words of the witness and and read over to them and they signed the same in the presence of myself & G. C. Reese (Attys) at the time and place herein mentioned; that I have personal knowledge of the personal identity of said witness and 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 in 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 12 day of February, 1924
J. M. McKeown Register (L. S.)

No. Page.....

The State of Alabama

County

IN CIRCUIT COURT, IN EQUITY.

Francis Sawyer

vs. Complainant,

Benjamin Sawyer
Respondent.

ORAL DEPOSITION.

Filed Feb 12th, 1924

J. M. McKeown, Register.

Recorded in

Record

Vol. Page.....

Register.

TO THE HONORABLE JOHN D. LEIGH, JUDGE OF THE CIRCUIT COURT, IN
EQUITY SITTING, IN AND FOR BALDWIN COUNTY, ALABAMA.

Comes FRANCES LANGER and humbly complainant against CLEMENS
LANGER respectfully shows unto your honor as follows:

FIRST: That complainant is over the age of twenty-one years
and a resident of Baldwin County, Alabama; that defendant Clemens
Langer is over the age of twenty-one years and a resident of Baldwin
County, Alabama.

SECOND: That complainant and defendant are husband and
wife having intermarried in Chicago, Illinios, in the year 1920 in
the month of July; that they lived together as husband and wife
until February 8th, 1924, when your complainant was forced by reason
of the cruelty and threats of defendant to leave their common home;
that defendant is a man of vicious timperament and ungovernable
temper; that he has from time to time cursed and abused complainant,
calling her vile and indecent names; that he has from time to time
threatened to strike her with various objects; that he has become
worse and that on-to-wit the night of February ^{8th 1924} without provocation
from her and because of no fault on her part, flew into a violent
rage and cursed and abused complainant and threatened to kill her,
that she has reasonable cause to believe and does believe that he
will attempt to execute his said threats, and that she is in danger
of life or health; that from his said conduct and his said threats
and the vile and abuseage threats made by him there is reasonable
apprehension on the part of complainant that he will do her violent
bodily injury.

THIRD: That defendant is an ablebodied man and has some
property, the exact amount complainant does not know, but that he
is amply able to make a substantial contribution to complainants
support and maintenance; that they hold certain properties jointly
between them; that she has not ^{own} sufficient property to properly sup-
port herself in the station to which she is accustomed.

That there are no children born to said marriage, but that
said defendant has two small children aged nine and five years borned

to him by a former marriage.

WHEREFORE complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint; that said Clémens Langer be made a party defendant to this bill of complaint and by appropriate process be required to plead, answer or demur to this bill of complaint, within the time and under the usual penalties prescribed by the law and the practice of this honorable Court;

Complainant further prays that upon the final hearing of this cause, your Honor will make and enter a decree forever dissolving the bonds of matrimony existing between complainant and said defendant; that a reference be held to ascertain the amount of alimony to which Complainant is entitled and which said defendant should pay; and that this Court make and enter a decree in favor of complainant against said defendant for alimony as to this court shall seem proper and meet; that complainant have such other further and different relief as in equity and good conscience this Court shall deem meet and proper.

Pickard & Beebe
Solicitors for Complainant

Defendant is required to answer each and every allegation of the foregoing bill of complaint, paragraphs First to Third inclusive, but not under oath, oath is hereby expressly waived.

Pickard & Beebe
Solicitors for Complainant.

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 ~~CLARENCE LINGER~~ Clemens Langer,

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

Frances Langer,

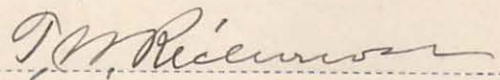
against said

~~CLARENCE LINGER~~ Clemens Langer,

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, T. W. Richerson, Register of said Circuit Court, this 9th day of February

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Register.

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

Original

Serve on

Circuit Court of Baldwin County
In Equity

No.

SUMMONS

Francis Langer

vs.

Clarence Langer

Frank W. Beebe,
Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this *9th* day of *Feb* 192*4*
W.R. Stuart
Sheriff.

Executed this *9th* day of *Feb* 192*4*
by leaving a copy of the within summons with
Clarence Langer

Defendant.

W.R. Stuart
Sheriff.

By *B. D. Wiggins*
Deputy Sheriff.

NOTE OF TESTIMONY

The State of Alabama,

Frances Langer

Complainant

VS.

Clemens Langer

Respondent

No. 224

In Circuit Court,
In Equity

IN THIS CAUSE comes the Complainant,

by her solicitor and submits the same for Final decree

~~decree~~ upon the Original Bill and exhibits thereto Answer

, and upon the following testimony, to-wit:

Deposition of Frances Langer and Jonas Gleick

I hereby certify that the above note of Testimony is correct.

This 15th day of February, 1924

[Signature]
Register.

3rd

No. 424

The State of Alabama

Barleev County

Circuit Court in Equity

Francis L. Taylor

Complainant

vs.

Albion Taylor

Respondent

NOTE OF TESTIMONY

Filed 15 day of Feb, 1924

R. M. [Signature] Register

Record _____ Page _____

RECORDED

FRANCES LANGER,)
COMPLAINANT)
VS)
CLEMENS LANGER,)
DEFENDANT)

CIRCUIT COURT, BALDWIN COUNTY, ALABAMA.
IN EQUITY.

Comes Clemens Langer, defendant in the above styled
c
cause and for answer to complainants bill of complaint, says:

In answer to the allegations of paragraph First he
admits the allegations as to the ages and places of residence
of both complainant and defendant.

In answer to the allegations of paragraph Second, he
admits that he and complainant are husband and wife, and that
they married in Chicago., Illinois in the month of July, 1920.

He denies every other allegation of paragraph second
and demands strict proof thereof.

IN answer to paragraph third, he admits that he is an
able bodied man, that he has a small amount of property, and
he further says that he has entered into an agreement with said
complainant for a division of their properties and has agreed to
convey to her more than two thirds of all their property, in which
he owns more than two thirds thereof, and that such division has
been accepted by said complainant in lieu of alimony and in full
settlement of property division.

And now having fully answered, defendants prays that he
may go hence with his reasonable costs.

Clemens Langer

Defendant waives notice of application to take evidence,
of the time and place for taking the same, and the right to appear
and cross examine witnesses; he further waives notice of application
for final decree and as well all other notices required by law to
be given him.

This the 11 day of February, 1924.

Clemens Langer

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 424 .. Vacation .. Term, 1924 ..

Frances Langer

Complainant.....

vs.

Clemens Langer

Defendant.....

To T.W.Richerson,, Register:

In the above stated cause a Decree Pro Confesso having been taking 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 Rickarby and Beebe,

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.

Rickarby & Beebe

Solicitor for Complainant.

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

Frances Langer

vs.

Clemesns Langer

REQUEST FOR DECREE IN
VACATION.

Filed February 15th 24
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G. W. Rich
Register

Recorded in Record

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RECORDED