

438

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 Willie Haines

of Mobile 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

Filly Mae Haines,

against said

Willie Haines

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 19th, day of April

192 4.

T. W. Richerson
Register.

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

Serve on.....

Circuit Court of Baldwin County
In Equity

No.

SUMMONS

Pollie Mae Gaines

vs.

Willie Gaines,

Henry D. Moorer.

Solicitor for Complainant.

Recorded in Vol. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Received in office this

day of 192

Sheriff.

Executed this day of

192

by leaving a copy of the within summons with

Defendant.

Sheriff.

By

Deputy Sheriff.

John Green
Deputy Sheriff

Witness:

Willie Gaines
X

I hereby accept service of the within summons and waive service of same by the sheriff.

IN THE CIRCUIT COURT, Baldwin COUNTY, IN EQUITY.

Pollie Mae Gaines Complainant.

vs.

Willie Gaines Respondent.

I, T. W. Rice

as Register

have called and caused to come before me Pollie Mae Gaines
and Arria Watson

witness es named in the Requirement for Oral Examination, on the 16 day of May, 1924, at the office of Register in Bay Minette, Alabama, and having first sworn said witness es to speak the truth, the whole truth, and nothing but the truth, the said Witnesses

doth depose and say as follows:

Testimony of Pollie Mae Gaines:

My name is Pollie Mae Gaines. I am a resident of Baldwin County, Alabama, and is over twenty-one years of age. I know Willie Gaines. He is my husband and he is over twenty-one years of age. I reside at Hurricane, Alabama and Willie Gaines lives ~~at~~ in Mobile, Alabama. We were lawfully married on December 24th, 1919 and lived together as man and wife until May 24th, 1920 at which time Willie Gaines voluntarily abandoned me without just cause or excuse and without fault on my part; that at the time he abandoned me we were living in Baldwin County, Alabama. I have lived in Baldwin County, Alabama my entire life and I am over twenty-one years of age.

Pollie Mae Gaines

Sworn and subscribed to before me this 16th day of May, 1924.

Register.

TESTIMONY OF POLLIE MAE GAINES:

Testimony of Orrie Watson:

My name is Orrie Watson. I live at Bromley, Alabama. I am twenty-two years of age. I have known Pollie Mae Gaines for the past seven years and know of my own knowledge that Willie Gaines has not lived with her since May 24th, 1920. I know nothing about the cause of his leaving her.

Orrie Watson

Sworn and subscribed to before me this 16th day of May, 1924.

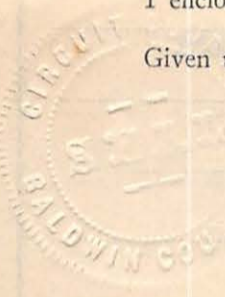
Register.

ORAL EXAMINATION.

I, J. M. Rescurren, as Register
hereby certify that the foregoing deposition.....on Oral Examination was taken down in writing by me
in the words of the witness ee and read over to them and they signed the same in the presence
of myself & H. D. Wooster (Att'y)
at the time and place herein mentioned; that I have personal knowledge of the personal identity of said wit-
ness ee or had proof made before me of the identity of said witness ee; 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 16th day of May, 1924
J. M. Rescurren (L. S.)



No. 488 Page.....

The State of Alabama

Baldwin County

IN CIRCUIT COURT, IN EQUITY.

Marie Mae Rainier

vs. Complainant,

Marie Rainier

Respondent.

ORAL DEPOSITION.

Filed May 16th, 1924

J. M. Rescurren, Register.

Recorded in

..... Record

Vol. Page

..... Register.

NOTE OF TESTIMONY

The State of Alabama,

Pollie May Gaines,

Complainant

VS.

Willie Gaines,

Respondent

No. 438.

In Circuit Court,

In Equity

IN THIS CAUSE comes the Complainant, Pollie Mae Gaines,
by her solicitor and submits the same for Complainant,
decree upon the Original Bill and exhibits thereto.

_____, and upon the following testimony, to-wit:

of Pollie May Gaines and Orrie Watson,

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

This 17th, day of May, 1924

J. W. P. [Signature]

Register.

No. 438

The State of Alabama

Barclay County

Circuit Court in Equity

Pattie May Gaine

Complainant

vs.

Winnie Gaine

Respondent

NOTE OF TESTIMONY

Filed 17 day of May, 1924

W. M. [Signature] Register

Record _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY.

}

CIRCUIT COURT, IN EQUITY.

No. 438. Spring Term, 191²⁴

..... Pollie Mae Gaines, Complainant.....

vs.

..... Willie Gaines, Defendant.....

To T. W. Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taken 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 H. D. Moorner,

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.

H. D. Moorner,
.....
Solicitor for Complainant.

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

Pollie Mae Gaines,

vs.

Will Gaines,

REQUEST FOR DECREE IN
VACATION.

Filed May 17th 1924. 191

T. W. Rice
Register

Recorded in Record

Vol. Page

Register

The State of Alabama, }
Baldwin County.

No. 438. CIRCUIT COURT, IN EQUITY

Pollie Mae Gaines, Complainant

vs.

Willie Gaines, Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of 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 the Complainant is forever divorced from the Defendant.

Voluntary abandonment,

It is further ordered, that the said Pollie May Gains, be, and she is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Pollie May Gaines, pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said Willie Gaines,

It is further ordered, adjudged and decreed that said Pollie May Gaines, shall not again marry except to said Willie Gaines, until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Willie Gaines, during the pendency of said appeal

This 15th day of September 1924
John D. Leigh
Judge of the Circuit Court of Baldwin County.

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

I, _____ Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the _____ day of _____ 192____, in the cause of _____ Complainant

vs.

_____ Defendant
as appears of record in said Court.

Witness my hand and the seal of said Court, this the _____ day of _____ 192____

Register.

No. 438.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Pollie May Gaines,

vs.

RECORDED

Willie Gaines,

DECREE OF DIVORCE.

Filed in office this

16th

day of

September, 192

4

D. M. Pickens

Register.

E. O. M.

RECORDED

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[Handwritten notes and signatures in the center section, including a large signature that appears to be 'D. M. Pickens' and some illegible text]

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

IN EQUITY.

TO THE HONORABLE J. D. LEIGH, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA - - - - - IN EQUITY.

Your Oratrix, Pollie Mae Gaines, respectfully
represents and shows unto Your Honor as follows:

FIRST. .

That she is a bona fide resident citizen of
Baldwin County, Alabama, and is over the age of twenty-one years,
and has lived in Baldwin County, Alabama for more than the last three pre-
ceding years. That Willie Gaines is a resident of Mobile
County, Alabama, and is over twenty-one years of age.

That Your Oratrix, Pollie Mae Gaines is residing
at Hurrican, Alabama,

That the said Willie Gaines is residing at Mobile,
Alabama., 515 South Conception Street.

SECOND.

That Your Oratrix and the said Willie Gaines
were lawfully married December 24th., 1919; that they resided
together as husband and wife until May 24th., 1920, when defendant
voluntarily abandoned complainant without just cause or excuse
and without fault on her part; that at the time of said abandon-
ment said defendant and complainant were residing in Baldwin
County, Alabama; that they have not lived together since abandonment.

PREMISES CONSIDERED complainant prays this
Honorable Court will take jurisdiction of the cuase made by this
bill of complaint, that said defendant be made a party defendant
to this bill of complaint and by appropriate process be required

to plead, answer and demur to this bill of complaint under the usual penalties and within the time required by law; that upon the final hearing of this cause, complainant be granted by this Honorable Court, an absolute divorce from the said Willie Gaines; and that such other further or different orders and decrees be made and entered as in the premises shall be meet.


Solicitor for Complainant.

FOOTNOTE: Defendant is required to answer every allegation in the foregoing bill, paragraph one to two inclusive, but not under oath. Oath is hereby expressly waived.


Solicitor for Complainant.