

8

The State of Alabama,
Baldwin County.

No. 8 CIRCUIT COURT, IN EQUITY

Eunice Moorer

Complainant

vs.

Irene Moorer

Defendant

In this cause it appears to the Court
that a Summons requiring the Defendant Irene Moorer

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to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the
service of said Summons upon her Irene Moorer
was served upon her by the Sheriff of Baldwin County, Alabama, on the
2nd day of December 19 33

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And the said Defendant ... having failed to demur, plead to or answer the said Bill of Complaint
to this date, it is now, therefore, on motion of Bebe & Hall, Solicitors
for Complainant

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as
confessed against the said Irene Moorer

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This 4th day of January 19 34

M. A. Stone
Register.

Defendant aforesaid.

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 Irene Moorer

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

Eunice Moorer

against said Irene Moorer

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, M. A. Stone, Register of said Circuit Court, this 1 st day of

December 193 3

M. A. Stone

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.

No. _____ CIRCUIT COURT IN EQUITY.

EUNICE MOORER

Complainant

vs.

IRENE MOORER

Defendant

Motion is hereby made for a Decree Pro Confesso against

IRENE MOORER

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 4th day of January 19 34

Beebe & Haef

Solicitor,

The State of Alabama }
 Baldwin County } Circuit Court of Baldwin County, Alabama,
 (In Equity)

Eunice Moorer

COMPLAINANT

VS.

Irene Moorer

RESPONDENT

I, M. A. Stone

as Register and Commissioner

have called and caused to come before me Eunice Moorer and J. L. Barrow

witness^{es} named in the requirement for Oral Examination, on the 6th day of January
 1934, at the office of M. A. Stone

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 Eunice Moorer

doth depose and say as follows:

My name is Eunice Moorer. I am a resident of Baldwin County, Alabama, and have been for more than three years next preceding the filing of the bill of complaint in this cause. I am over twenty-one years of age.

The respondent Irene Moorer is over twenty-one years of age and a resident of Baldwin County, Alabama.

That the Complainant and Respondent were married at Bay Minette in Baldwin County, Alabama, in October 1929;

That they lived together as man and wife in Bay Minette, Alabama, until October 10th, 1933, when the said Irene Moorer, the respondent committed acts of adultery with one Tom Jones of Bay Minette, Alabama. That the said Tom Jones had been running around with the said Irene Moorer from some time, and he had warned them to quit it; that on October 10th, 1933 he was advised that the Respondent and Tom Jones were together, and he immediately got Mr. Barrow, Town Marshall of the town of Bay Minette, Alabama, and Mr. Morris Hamilton, Deputy Sheriff, and went up to the room where Tom Jones stayed in the Arcade Building in Bay Minette, and found the Respondent and Tom Jones in the room on the bed; that the said Tom Jones was placed in jail that night, and got out next morning, and boasted that he had been staying with the Respondent and had taken her away from her husband the Complainant; that he made the statement that he had had intercourse with the Respondent; that it was generally known that the Respondent was running around and staying with the said Tom Jones; that the Complainant had known of her acts for some time, but had not been able to catch them in the act until the night of October 10th, 1933;

That said acts of adultery were committed without the consent or approval of the Complainant and that the Complainant did not condone said acts of adultery.

Witness
 M. A. Stone

Eunice Moorer
 her

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

Comes your Complainant, EUNICE MOORER, and humbly complaining against the respondent, IRENE MOORER, respectfully represents and shows unto your Honor and the Honorable Court, as follows:

FIRST

That he is a bona fide resident of Baldwin County, Alabama, over twenty-one years of age; that he has been such a resident of Baldwin County, Alabama, for more than three years next preceding the filing of the bill of complaint in this cause; that the respondent is over twenty-one years of age and a resident of Baldwin County, Alabama, residing in Bay Minette.

SECOND

That your Complainant and respondent are husband and wife, having intermarried at Bay Minette, in Baldwin County, Alabama, on or about, in October, 1929.

THIRD

That they lived together in Bay Minette, Alabama, until on to-wit: October 10th, 1933, when the respondent committed adultery with one Tom Jones; that Complainant did not consent to nor has he condoned said acts of adultery; that said acts of adultery were committed in Bay Minette, Baldwin County, Alabama.

WHEREFORE the premises considered the Complainant prays that your Honor will by proper process make the said IRENE MOORER, party respondent to this bill of complaint, requiring her to plead, answer, or demur to the same within the time and under the penalties prescribed by law and the practice of the Honorable Court.

COMPLAINANT further prays that upon a final hearing of this cause your Honor will give and grant unto him a decree of

divorce, forever barring the bonds of matrimony existing between him and the said Irene Moorer; that your Honor will give and grant unto him, such other, farther, different, or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

Beebe & Hall
Solicitors for Complainant

FOOT NOTE

The Respondent is required to answer each and every allegation contained in the foregoing bill in paragraphs FIRST to THIRD, inclusive, but not under oath, oath being hereby expressly waived.

Beebe & Hall
Solicitors for Complainant.

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

Comes your Complainant, EUNICE MOORER, and humbly complaining against the respondent, IRENE MOORER, respectfully represents and shows unto your Honor and the Honorable Court, as follows:

FIRST

That he is a bona fide resident of Baldwin County, Alabama, over twenty-one years of age; that he has been such a resident of Baldwin County, Alabama, for more than three years next preceding the filing of the bill of complaint in this cause; that the respondent is over twenty-one years of age and a resident of Baldwin County, Alabama, residing in Bay Minette.

SECOND

That your Complainant and respondent are husband and wife, having intermarried at Bay Minette, in Baldwin County, Alabama, on or about, in October, 1929.

THIRD

That they lived together in Bay Minette, Alabama, until on to-wit: October 10th, 1933, when the respondent committed adultery with one Tom Jones; that Complainant did not consent to nor has he condoned said acts of adultery; that said acts of adultery were committed in Bay Minette, Baldwin County, Alabama.

WHEREFORE the premises considered the Complainant prays that your Honor will by proper process make the said IRENE MOORER, party respondent to this bill of complaint, requiring her to plead, answer, or demur to the same within the time and under the penalties prescribed by law and the practice of the Honorable Court.

COMPLAINANT further prays that upon a final hearing of ~~this~~ cause your Honor will give and grant unto him a decree of

divorce, forever barring the bonds of matrimony existing between him and the said Irene Moorer; that your Honor will give and grant unto him, such other, further, different, or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

Beche & Stace
Solicitors for Complainant

FOOT NOTE

The Respondent is required to answer each and every allegation contained in the foregoing bill in paragraphs FIRST to THIRD, inclusive, but not under oath, oath being hereby expressly waived.

Beche & Stace
Solicitors for Complainant.

EUNICE MOORER,)
COMPLAINANT,)
VS.)
IRENE MOORER,)
RESPONDENT.)

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

This cause coming on to be heard, was submitted upon the original bill of complaint on behalf of the complainant, and the pleadings 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 the respondent be and the same are hereby dissolved and the complainant is forever divorced from the respondent on the ground of adultery;

It is further ORDERED that the said Eunice Moorer be and he 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 Eunice Moorer pay the costs herein taxed, for which execution may issue.

It is further ORDERED, ADJUDGED AND DECREED that said Eunice Moorer shall not again marry, except to the said Irene Moorer, until sixty days after this date, and that if an appeal is taken within sixty days, he shall not marry again, except to the said Irene Moorer, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, on this the 11th day of January, 1934.

F. W. Hare
Judge of the Circuit Court of
Baldwin County, Alabama

EUNICE MOORER,
Complainant,
vs.
IRENE MOORER,
Respondent.

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

This cause coming on to be heard, was submitted upon the original bill of complaint on behalf of the complainant, and the pleadings 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;

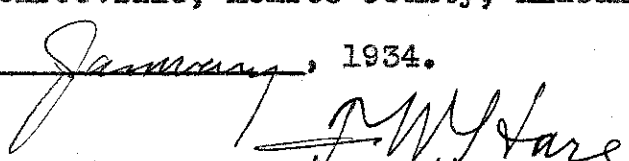
It is therefore ORDERED, ADJUDGED AND DECREED by the court that the bonds of matrimony heretofore existing between the complainant and the respondent be and the same are hereby dissolved and the complainant is forever divorced from the respondent on the ground of adultery;

It is further ORDERED that the said Eunice Moorer be and he 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 Eunice Moorer pay the costs herein taxed, for which execution may issue.

It is further ORDERED, ADJUDGED AND DECREED that said Eunice Moorer shall not again marry, except to the said Irene Moorer, until sixty days after this date, and that if an appeal is taken within sixty days, he shall not marry again, except to the said Irene Moorer, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, on this the 11th day of January, 1934.


Judge of the Circuit Court of
Baldwin County, Alabama.

Circuit Court, Baldwin County, Ala.,

IN EQUITY.

8

Eunice Moore
vs.
Eunice Moore

PLAINTIFF

DEFENDANT

BILL OF COST

	Dollars	Cts.		\$	Cts.
Fees of Register			AMOUNT BROUGHT FORWARD		
Filing each bill and other papers 7			For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.	5	10
Issuing each Subpoena		70	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Issuing each copy thereof		50	Each Notice Sent by Mail to Creditors		
Entering each return thereof		30	Filing, Receipting for and Docketing each Claim, etc.		15
For each Order of Publication		15	For all entries on Subpoena Docket, etc.		25
Issuing Writ of Injunction		1 00	For all entries on Commission Docket, etc.		50
For each Copy thereof		1 50	Making Final Record, per hundred words		50
Entering each return thereof		1 50	Certified Copy of Decree		15
Issuing Writ of Attachment		1 00	Report of Divorce to State Health Office		1 00
Entering each return thereof		1 00	Acts 1915		50
Issuing Writ of Attachment		1 00	Total Fees of Register	9	10
Entering each return thereof		1 00			
Docketing each case		1 00	FEEES OF SHERIFF		
Entering each Appearance		25	Serving and Returning Subpoena on Deft.	\$1	50
Issuing each Decree Pro Confesso on personal service		1 09	Serving and Returning Subpoena for Witness		65
Issuing each Decree Pro Confesso on publication		1 00	Levyng Attachment		3 00
Each Order Appoiating Guardian		1 00	Entering and Returing same		25
Any other order by Register		50	Entering and Returning Execution		25
Issuing Commission to Take Testimony		50	Selling Property Attached		25
Receiving and Filing		10	Impaneling Jury		75
Endorsing each package		10	Executing Writ of Possession		2.50
Entering Order Submitting Cause		50	Collecting Execution for Costs		1.50
Entering any other Order of Court		25	Serving and Returning Sci. Fa., each		65
Noting all Testimony		50	Serving and Returning Notice		65
Abstract of Cause, etc.		1 00	Serving and Returning Writ of Injunction		1.50
Entering each Decree		75	Serving and Returning Writ of Exeat		1.50
For Every Hundred Words Over Five Hundred		15	Taking and Approving Bonds, each		1.00
Taking Account on Reference		3 00	Collecting Money on Execution		
Taking Testimony, etc.		15	Making Deed		2.50
Each Report, Five Hundred Words or less		2 50	Serving and Returning Application		1.00
For every Hundred Words Over Five Hundred		15	Serving Attachment, Contempt of Court		1.50
Amount Claimed, Less than Five Hundred Dollars, etc.		2 00	TOTAL FEES OF SHERIFF	1	50
Issuing each Subpoena		25			
Witness Certificate, each		25	Recapitulation		
Issuing Execution, each		75	Register's Fees	9	10
Entering each Return		15	Sheriff's Fees	1	50
Taking and Approving Bond, each		1 00	Commissioner's Fees		5 00
Making Copy of Bill, etc.		15	Solicitor's Fees		
Each notice not otherwise provided for		50	Witness Fees		
Each Certificate or Affidavit, with Seal		25	Guardian Ad Litem		
Each Certificate or Affidavit, no Seal		25	Printer's Fees		
Hearing and passing on application for Receiver or Trustee		3 00	Trial Tax		3 00
Each Settlement with Receiver or Trustee		3 00	Recording Decree in Probate Court		
Examining each Voucher of Receiver or Trustee		10			
Examining each Answer on Exception		3 00	Total	\$	18.60
Recording Resignation or Suggestion of Death of Trustee		75			
Entering each Certificate to Supreme Court		50			
Taking Questions and Answers, etc.		25			
For all other service relating to such proceedings		1 00			
For service in proceeding to relieve minors, etc. same fee as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.					
Sub Total Carried Forward		510			

Received payment this day of 193

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs. Register.

8581 NOTE OF TESTIMONY

Eunice Moorer

vs.

Irene Moorer

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,
Decree Pro Confesso, and testimony of Eunice Moorer and
J. L. Barrow,

and in behalf of Defendant upon

M. A. Stone

Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 8

Term, 192

Eunice Moorer

Complainant

vs.

Irene Moorer

Defendant

To M. A. Stone, 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 Beebe & Hall

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.

Beebe & Hall

Solicitor for Complainant.

No. 8

RECORDED
Page 8

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The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

Eunice Moorer

vs.

Irene Moorer

**MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE**

Filed **January** **4th** **1934**

Register.

Recorded in _____ Record.

Page

Vol. *W. A. Stone*

Register.

RECORDED
W. H. H.

No. Page

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THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

VS.

REQUEST FOR DECREE IN
VACATION

FILED *January 11th 1934*

Register

RECORDED IN RECORD

VOL. PAGE

W. H. H.
Register

MOORE PTG. CO

No. -----

RECORDED
copy

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

VS

NOTE OF TESTIMONY

Filed in Open Court this

11th

19*34*

day of *January*
W. A. Steele

Register

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Circuit Court, Baldwin County, Ala.
In Equity.

No. 8

Ernie Moore

VS.

Ernie Moore

Cost Bill

Paid _____, 193

Register.

NO.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY ALABAMA.

IN EQUITY

EDNICE MOORE

COMPLAINANT

VS.

IRENE MOORE

RESPONDENT

DECREE OF DIVORCE

GRANTED ON THIS THE 11TH
DAY OF JANUARY, 1934.

FILED JANUARY 11TH, 1934.

W. A. Stone
REGISTER.

8

No. 8.

ORIGINAL

RECORDED
act

EUNICE MOORER,
COMPLAINANT

VS

IRENE MOORER,
RESPONDENT

BILL OF COMPLAINT

Filed this the 1st day of
December, 1933.

Wm. A. Stone

Register

No. 8

~~COPY~~

EUNICE MOORER,
COMPLAINANT

VS.

IRENE MOORER,
RESPONDENT

BILL OF COMPLAINT

Filed this the 1st day of
December, 1933.

W. A. Stone

Register

8

RECORDED
RECORDED

8

No. 8

Page

The State of Alabama,
Baldwin County

Circuit Court In Equity

Eunice Moorer

vs.

Irene Moorer

Decree Pro Confesso On
Personal Service.

Issued January 4, 1934

M. A. Stone
Register.

The State of Alabama }
Baldwin County

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

Eunice Moorer

COMPLAINANT

VS.

Irene Moorer

RESPONDENT

I, M. A. Stone

as Register and Commissioner

have called and caused to come before me Eunice Moorer and J. L. Barrow

witness es named in the requirement for Oral Examination, on the 6th day of January

1934, at the office of M. A. Stone

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 Eunice Moorer

doth depose and say as follows:

My name is Eunice Moorer. I am a resident of Baldwin County, Alabama, and have been for more than three years next preceding the filing of the bill of complaint in this cause. I am over twenty-one years of age.

The respondent Irene Moorer is over twenty-one years of age and a resident of Baldwin County, Alabama.

That the Complainant and Respondent were married at Bay Minette in Baldwin County, Alabama, in October 1929;

That they lived together as man and wife in Bay Minette, Alabama, until October 10th, 1933, when the said Irene Moorer, the respondent committed acts of adultery with one Tom Jones of Bay Minette, Alabama. That the said Tom Jones had been running around with the said Irene Moorer from some time, and he had warned them to quit it; that on October 10th, 1933 he was advised that the Respondent and Tom Jones were together, and he immediately got Mr. Barrow, Town Marshall of the town of Bay Minette, Alabama, and Mr. Morris Hamilton, Deputy Sheriff, and went up to the room where Tom Jones stayed in the Arcade Building in Bay Minette, and found the Respondent and Tom Jones in the room on the bed; that the said Tom Jones was placed in jail that night, and got out next morning, and boasted that he had been staying with the Respondent and had taken her away from her husband the Complainant; that he made the statement that he had had intercourse with the Respondent; that it was generally known that the Respondent was running around and staying with the said Tom Jones; that the Complainant had known of her acts for some time, but had not been able to catch them in the act until the night of October 10th, 1933;

That said acts of adultery were committed without the consent or approval of the Complainant and that the Complainant did not condone said acts of adultery.

Witness
of Hearsay
M. A. Stone

Eunice Moorer
his

M. A. Stone

J. L. Barrow a witness for the Complainant being first duly sworn, deposes and says:

My name is J. L. Barrow. I am Town Marshall of the town of Bay Minette, Alabama; that prior to October 10th, 1933, the Complainant Eunice Moorer, complained to me as an Officer that Tom Jones was running around with his wife, the respondent, Irene Moorer; that on the night of October 10th, 1933 Eunice Moorer came to me and asked that I go with him, that Tom Jones and his wife Irene Moorer were together up in the Arcade Building; that I got Mr. Hamilton, Deputy Sheriff to go with me, and Mr. Hamilton and I went with Eunice Moorer to the room where Tom Jones stayed in the Arcade Building. We found Tom Jones and Eunice Moorer in the room on the bed with the light off; that when we entered Irene Moorer got up off the bed and put on her clothes.

J. L. Barrow

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 Irene Moorer

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

Eunice Moorer

against said Irene Moorer

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, M. A. Stone, Register of said Circuit Court, this 1 st day of

December

1933

M. A. Stone Register

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

Wardell Page 66

RECORDED

8

SERVE ON Irene Moorer
W. C. A. Thompson
Circuit Court of Baldwin County
IN EQUITY

No. _____
SUMMONS

Eunice Moorer

VS.

Irene Moorer

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this 2nd

day of Dec 1933

W. C. A. Thompson

SHERIFF

Executed this 2nd day of
December 1933

by leaving a copy of the within Summons with

Irene Moorer

Defendant

W. B. Stewart

Sheriff

By _____
Deputy Sheriff

H. M. Hall
Solicitor for Complainant

Recorded in Vol. _____ Page _____