

The	State of Alabaman State of Ala	abama,)	No, 8		CIRCU	IT COUR'	r, in Equity
		Euni ce	Moore:	77		,	
			vs.			C	omplainant
		Irene	Moore:	r			
In	this cause it appears to				7.2		Defendant
that a Su	ammons requiring the D	efendant Trene	Moore:	r	·	• • • • • • • • • • • • • • • • • • •	
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Register.

The State of Alahama

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o Any Sh	eriff of th	e State o	f AlabamaG	REETING	•	1 :	:	
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inico V	ere to answ	er, plead of	r demur, with	iout oath, to	o a Bill of	Complaint	lately exhibi	tec

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 . 193 **- 3**

December

Register

to.					JRT IN E(
		-EUNI-CE MOC	RER		 - Complain	ant :
		·	vs.	·	r - w.r.	cat10
******		IREME MOO	RER	:		
Motion is	hereby made for	a Decree Pro Co	ifesso against.		 Defenda	int
~~~~		IRENE MOORE				-
	stated cause, on toon said Defendan	, with might Si	ild Summona -			
Thia	4th		•			-wabt

## The State of Alabama Baldwin County

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

Dal	dwin County	(In Equity)	
	Eunice Moorer		
•		COMPLAINANT	
	$\mathbf{V}$	S.	
	Irene Moorer		
		RESPONDENT	
,	M A Stone		
I,	M. A. Stone		
as Register a	and Commissioner		
have called an	nd caused to come before me <u>Funic</u>	ce Moorer and J. L. Barrow	
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· ·			
witness es na	amed in the requirement for Oral Exa	amination, on the 6th day of January	
		,	
193 <del>4</del> , at the	e office of M. A. Stone		٠.
n Bay Mi	nette, Alabama, and	having first sworn said witness to speak the	
		the said Eunice Moorer	
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		doth depose and say as follows:	
bama, and filing of years of a The respon	have been for more than the bill of complaint in age.	resident of Baldwin County, Ala- three years next preceding the n this cause. I am over twenty-one er twenty-one years of age and a na.	
	Complainant and Responden ounty, Alabama, in Octobe	nt were married at Bay Minette in er 1929;	
until Octodent commit Alabama. Said Irens that on Octom Jones Marshall octom, Deput the Arcade Jones in the Long that been stay; band the Course with Respondent the Complate to call that said	ober 10th, 1933, when the itted acts of adultery wi That the said Tom Jones e Moorer from some time, etober 10th, 1933 he was were together, and he im of the town of Bay Minett ty Sheriff, and went up to Building in Bay Minette the room on the bed; that night, and got out next ing with the Respondent at the Respondent; that if the Respondent; that if the Respondent; that if a was running around and ainant had known of her a acts of adultery were constants of adultery were constants.	and wife in Bay Minette, Alabama, a said Irene Moorer, the respontith one Tom Jones of Bay Minette, had been running around with the and he had warned them to quit it; advised that the Respondent and mediately got Mr. Barrow, Town te, Alabama, and Mr. Morris Hamilto the room where Tom Jones stayed e, and found the Respondent and Tom the said Tom Jones was placed in morning, and boasted that he had and had taken her away from her hus the statement that he had had intent the staying with the said Tom Jones; the statement of the said Tom Jones; the staying with the said Tom Jones with the	Jo er- hat
	<del>-</del>	the Complainant did not condone	•
	of adultery.	<i>l</i> :-	
Huissa	<del>u</del>	Ennice Moores	
Magadas	eles	Mucy Mobil	

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 nest 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 Johes; 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 MOOREE, 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 bodes 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 conscirnce entitled to receive, and as in duty bound he will ever pray.

Beele Totale
Solicitors for Complainant

ETOM TOUR

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.

Solicitors for Complainant.

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

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#### FIRST

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#### SECOND

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#### 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 conscirnce entitled to receive, and as in duty bound he will ever pray.

Beels + 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.

Solicitors for Complainant.

EUNICE MOORER,	)	IN THE CIRCULT COURT OF
COMPLAINAN	T, )	BALDWIN COUNTY, ALABAMA.
VS.	<b>)</b>	IN BQUITY.
IRENE MOORER.	Marijan	
RESPONDENT	)	

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 count 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.

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 // day of Commence, 1934.

Judge of the Circuit Court of Baldwin County, Alabama.

# Circuit Court, Baldwin County, Ala., IN EQUITY. Summe Moorer VS. Moorer Leve Moorer Delications

**PLAINTIFF** 

DEFENDANT

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Certificate or Affidavit. no Seal25		•		Register's Fees.		91	(0)
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Settlement with Receiver or Trustee3 00		]		Commissioner's Fees	1	~tz	00
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ill other service relating to such proceedings1 00				Recording Decree in Probate Court	•		~
service in proceeding to relieve minors, etc. same fee as in similar cases.			(Challenger				1
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Sub Total Carried Forward	1					1	1

Received payment this _____ day of _____ 193

8581 NOTE OF TESTIMONY	
Eunice Moorer	THE STATE OF ALABAMA, BALDWIN COUNTY
vs. Irene Moorer	IN EQUITY,  CIRCUIT COURT OF BALDWIN COUNTY.
Decree Pro Confesso, and testimo	
.J. L. Barrow,	
and in behalf of Defendant upon	
	^
	ma a Stone

Register.

		THE TAX NOT HELY
STATE OF ALABAMA,	)	CIRCUIT COURT, IN EQUITY.
Baldwin County.	No. 8	Term, 192
Eunice Moorer		, Complainant
	vs.	
Irene Moorer	·	, Defendant
1		
To M. A. Stone		, Register:
and evidence having been taken, a	nd the cause being i	o having been taken against the Defendant, ready for submission for final decree, and no
defense having been interposed, t	he Complainant, by	Beebe & Hall
	Colinitary of rec	ord, now files with the Register of this Court
this written request to deliver th	e papers in this caus	se to the Judge for final decree in vacation.
		Beele Total
	••	Solicitor for Complainant.

# The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY

Hunice Moorer

Irene Moorer

MOTION FOR DECREE PRO

CONFESSO ON PERSONAL SERVICE

Filed January 4th , 1934

Register.

Record

Recorded in ...

Register.

Moore Printing Company, Bay Minette, Ala.

MOORE PTG. CO	RECORDED IN RECORD  PAGE  PAGE		FILED January 17th 19th	REQUEST FOR DECREE IN VACATION	vs.	THE STATE OF ALABAMA BALDWIN COUNTY CIRCUIT COURT, IN EQUITY	No
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THE STATE OF ALABAMA BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

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NOTE OF TESTIMONY

Filed in Open Court this____

Register

MOCRE PTGCO

Circuit Court, Baldwin County, Ala.
In Equity.

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sene Moorer

Register.

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Charles and the first of the control of the control of the

IN THE CIRCUIT COURT OF BALDWIN COUNTY ALABAMA.

YTUGE NI

MOO RER

COMPLAINANT

VS

TRENE MOORER

RESPONDENT

DECREE OF DIVORCE

GRANTED ON THIS THE 11TH

DAY OF JANUARY, 1934.

FILED JANUARY LITTS 1934.

NO. 8.

ORIGINAL

A COMPANY OF THE COMP

EUNICE MOORER, COMPLAINANT

S

IRENE MOORER,

ILL OF COMPLAINT

Filed this the 1st day of December, 1933.

Register

EUNICE MOORER, COMPLAINANT

VS.

IRENE MOORER, RESPONDENT

BILL OF COMPLAINT

Filed this the 1st day of December, 1933.

Register

Page.

The State of Alabama,
Baldwin County

Circuit Court In Equity

Hunice Moorer

Irene Moorer

Decree Pro Confesso On Personal Service.

# The State of Alabama Baldwin County

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

Irene Moorer  I, M. A. Stone  as Register and Commissioner have called and caused to come before me Eunice Moorer and J. L. Barrow  witness S 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 s to speak the truth, the whole truth, and nothing but the truth, the said Eunice Moorer  doth depose and say as follows:  Wy name is Eunice Moorer. I am a resident of Baldwin Gounty, Alabama, and have been for more than three years next preceding the filling 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 men and wife in Bay Minette, Alabama, until October 10th, 1933, when the said Irene Moorer, the respon- dent 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 one Marshall of the town of Bay Minette, Alabama, and from Jones in the room on the bed that the room maker Tom Jone one stayed it, the areade Building in Bay Minette, alabama, and har. Morris Banil- ton, Deputy Sheriff, and went up to the room where Tom Jones taxyed it, the areade Building in Bay Minette, alabama, and har. Morris Banil- ton, Deputy Sheriff, and went up to the room where Tom Jones taxyed it, the Areade Building in Bay Minette, alabama, and har. Morris Banil- ton, Deputy Sheriff, and went up to the room where Tom Jones taxyed it, the Areade Building in Bay Minette, alabama, and har Morris Banil- ton, Deputy Sheriff, and went up to the room where Tom Jones taxyed it. The Complainant in the act u	•	Eunice Moorer	COMPLAINANT
as Register and Commissioner— have called and caused to come before me Eunice Moorer and J. L. Barrow  witness 35 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 sworm said witness 85 to speak the truth, the whole truth, and nothing but the truth, the said Eunice Moorer  doth depose and say as follows:  Ny 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 Lene 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 10219.  That they lived together as men 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 Emmitten, Deputy Sheriff, and went up to the room where Tom Jones stayed it the arcade Building in Bay Minette, Alabama, and Mr. Morris Emmitten, Amarshall of the town of 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 the Statement that he had had income sin 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 the Statement that he had had income such as the said acts of adultery were committed withou			vs.
witness se named in the requirement for Oral Examination, on the 6th day of January  witness s 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 swom said witness s peak the truth, the whole truth, and nothing but the truth, the said Eunice Moorer  doth depose and say as follows:  by name is Bunice Moorer. I am a resident of Baldwin County; Alabama, and have been for more than three years next preceding the filling 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 men and wife in Bay Minette, Alabama, until October 10th, 1933, when the said Irene Moorer, the respondent committed eats of adultery with one Tom Jones of Bay Minette, Alabama, until October 10th, 1933 he was advised that the Respondent and Tom Jones were together, 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 Aroade 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 head hen staying with the Respondent; that it was generally known that the Respondent was running around and staying with the said Tom Jones; the 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		Irene Moorer	RESPONDENT
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rowal of the Complainant and that the Complainant did not condone said acts of adultery.	until Octob dent commit Alabama. T said Irene that on Oct Tom Jones w Marshall of ton, Deputy the Arcade Jones in th jail that n been stayin band the Co course with Respondent the Complai able to cat	er 10th, 1933, when the dacts of adultery hat the said Tom Jone Moorer from some time ober 10th, 1933 he was ere together, and he the town of Bay Mine Sheriff, and went up Building in Bay Minet e room on the bed; thight, and got out nex g with the Respondent mplainant; that he mathe Respondent; that was running around an nant had known of her ch them in the act un	he said Irene Moorer, the respon- with one Tom Jones of Bay Minette, s had been running around with the , and he had warned them to quit it; s advised that the Respondent and immediately got Mr. Barrow, Town tte, Alabama, and Mr. Morris Hamil- to the room where Tom Jones stayed in te, and found the Respondent and Tom at the said Tom Jones was placed in t morning, and boasted that he had and had taken her away from her hus- de the statement that he had had inten it was genereally known that the d staying with the said Tom Jones; the acts for some time, but had not been til the night of October 10th, 1933; committed without the consent or app-
Milnessa M. a. Stone	rowal of th	e Complainant and tha	t the Complainant did not condone
M. a. Stone	Wilnessan		Ennice Moores
	M. a. St	ou	1) Marie

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 cam 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.S. Banaus

SUMMONSORIGINAL.		MOORE PRI	nting co., bay minet	TE, ALA
The State of Alabama	ourt of Baldw	in County	, In Equity.	· · · · · · · · · · · · · · · · · · ·
To Any Sheriff of the State of AlabamaGREETIN	IG:			
WE COMMAND YOU, That you summon	rene Moore	3		
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of Baldwin County, exercising Chancery jurisdiction,				
of Baldwin County, exercising Chancery jurisdiction,	within thirty	days after	the service of	Sum-
of Baldwin County, exercising Chancery jurisdiction,	within thirty	days after	the service of	Sum-
of Baldwin County, exercising Chancery jurisdiction, mons, and there to answer, plead or demur, without oath	within thirty	days after	the service of	Sum-
of Baldwin County, exercising Chancery jurisdiction, mons, and there to answer, plead or demur, without oath	within thirty	days after	the service of	Sum-
of Baldwin County, exercising Chancery jurisdiction, mons, and there to answer, plead or demur, without oath	within thirty	days after	the service of	Sum-
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of Baldwin County, exercising Chancery jurisdiction, mons, and there to answer, plead or demur, without oath  Eunice Moorer	within thirty	days after	the service of	Sum-
of Baldwin County, exercising Chancery jurisdiction, mons, and there to answer, plead or demur, without oath  Eunice Moorer	within thirty	days after	the service of	Sum-
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of Baldwin County, exercising Chancery jurisdiction, mons, and there to answer, plead or demur, without oath  Eunice Moorer	within thirty	days after	the service of	Sum-
of Baldwin County, exercising Chancery jurisdiction, mons, and there to answer, plead or demur, without oath Eunice Moorer  against said Irene Moorer	within thirty	days after	the service of	Sum-

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 ______ day of

December 193.

M. a. Stone

_ Register

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

SERVE ON Irone Moorer
Circuit Court of Baldwin County
IN EQUITY

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102 사			ALABAMA	

Executed this 2 2 day of

Have the Manager of the within Summons with

here Mooren

Defendant Chariff

Sheriff

Deputy Sheriff