8558 DECREE OF DIVORCE. Gill P. Co., Mobile

# The State of Alabama,
Baldwin County.

No. 386. CIRCUIT COURT, IN EQUITY

Sena French Complainant

vs.

Roland W French. 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.

Cruelty

It is further ordered, that the said Sen a French be, and s 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 Sena French 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 Roland W French,

It is further ordered, adjudged and decreed that said Sena French shall not again marry except to said Roland W French until sixty days after this date, and that if an appeal is taken within sixty days s he shall not marry again except to said Roland W French, during the pendency of said appeal

This 24 day of ~~October~~ November, 192 3

John D. Leigh
Judge of the Circuit Court of Baldwin County.

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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. 386.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.
BALDWIN COUNTY, ALA.

Sena French

vs.

Roland W. French

RECORDED

DECREE OF DIVORCE.

Filed in office this 29th

day of ~~October~~ November, 192 3

T. W. Richerson
Register.

E. O. M.

RECORDED

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|---|---|
| SENA FRENCH, COMPLAINANT. | NO._____ |
| VS. | IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY. |
| ROLAND W. FRENCH, RESPONDENT. | |

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

THE BILL OF COMPLAINT OF SENA FRENCH, EXHIBITED AGAINST ROLAND W. FRENCH, RESPECTFULLY REPRESENTS AND SHOWS UNTO YOUR HONOR THE FOLLOWING:

1.- Complainant, Sena, French, respectfully shows that she was married to Roland W. French in Baldwin County, Alabama, November first, 1911; that she and her said husband are more than twenty-one years of age, and she is a bona fide resident of the State of Alabama, and has been for more than a year next prior to the filing of this bill of complaint, and her said husband has no fixed place of residence, but is at present, to the best of her knowledge, in New Orleans, Louisiana.

2.- In the summer of 1915, he struck complainant in the face with his fist and knocked her down and she became unconscious. In the summer of 1919, he again struck her, and caught her by the throat; in February, 1922, he struck her, and in December, 1922, he struck her several times. On all of these occasions, these blows were stricken her without fault on her part, and she has not lived with him since the last act of cruelty. She therefore charges that her said husband has been guilty of cruel treatment to her, accompanied by violence to her person, and endangering her life or health.

3.- Her said husband is an able-bodied man, capable of making a good living and properly supporting her, and the complainant is without means, and will be dependent on her own efforts in future for a support.

PRAYER.

The premises considered, complainant prays that her said husband be made party defendant to this bill, and that such orders be made and proceedings be had as are in compliance with the rules and practice of this Honorable Court; that she be granted a decree from the bonds of matrimony, temporary and permanent alimony, with an adequate allowance for solicitors' fees, and the expense of taking testimony in this cause; and such other and further relief as she may be entitled to receive.

Webb & Shepard
SOLICITORS FOR COMPLAINANT.

FOOT NOTE: The respondent is required to answer each of the allegations of the foregoing bill of complaint, but not under oath, his answer under oath being hereby expressly waived.

Webb & Shepard
SOLICITORS FOR COMPLAINANT.

ANSWER

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|---|---|
| SENA FRENCH, COMPLAINANT. | IN THE CIRCUIT COURT OF BALDWIN |
| VS. | COUNTY, ALABAMA. IN EQUITY. |
| ROLAND W. FRENCH, RESPONDENT. | NUMBER_____ |

NOW COMES THE DEFENDANT IN THE ABOVE ENTITLED CAUSE, and for answer to the bill of complaint herein, says: He denies each and every allegation of the same.

Roland W. French
RESPONDENT.

STATE OF LOUISIANA, )
PARISH OF ORLEANS. )

I, William A. Wenck, a Notary Public in and for the State and Parish aforesaid, do hereby certify that Roland W. French, whose name is signed to the foregoing answer, and who is known to me, acknowledged before me on this day, that, being informed of the contents of the said answer, he executed the same voluntarily, on the day the same bears date.

In witness whereof, I have hereunto set my hand AND OFFICIAL SEAL, on this, the 7th day of September, 1923.

WILLIAM A. WENCK
PARISH OF ORLEANS STATE OF LOUISIANA NOTARY PUBLIC

W A Wenck
Notary Public, Parish of Orleans, Louisiana.

STATE OF ALABAMA, )
COUNTY OF MOBILE. )

Before me, L. C. Harris, a Notary Public in and for the State and County aforesaid, personally appeared James H. Webb, who, being by me first duly sworn, says that he is of counsel for Mrs. Sena French, in the suit for divorce filed by her against Roland W. French, and that at the time of the filing of said bill, the said Roland W. French was a non-resident of the State of Alabama, residing in New Orleans, Louisiana.

J. H. Webb

Sworn to and subscribed
before me, this 30th. day
of July, 1923.

L. C. Harris,
Notary Public, Mobile County,
Alabama.

OFFICIAL ORGAN FOR PUBLICATION OF ALL COUNTY ADVERTISING

CIRCULATION GUARANTEED TO BE THE LARGEST IN BALDWIN COUNTY

# THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: $1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE NO. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

Notice
Sena French
French. The State
Baldwin County. Circuit
In Equity. This the 31st day of
July, 1923.
No. 386.

In this cause it being made to appear to the Clerk of this Court by the affidavit of J. H. Webb, one of the Attorneys for Complainant, that the Defendant, Roland W. French, is a non-resident of the State of Alabama residing in New Orleans, La., and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in The Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Roland W. French, to answer or demur to the Bill of Complaint in this cause by the 31st day of August, 1923, or after thirty days therefrom a decree Pro Confesso may be taken against him.

T. W. Richerson, Register.

Webb and Shepard,
Attys for Complainant.
25-4t

## AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

W. M. Moore, being duly sworn, deposes and says that he is the FOREMAN of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of Sena French vs Rolland W. French.

Was published in said Newspaper for 4 consecutive weeks in the following issues:

Date of first publication Aug. 2. 1923 Vol. 34 No. 25
" " second " " 9. 1923 Vol. " No. 26
" " third " " 16. 1923 Vol. " No. 27
" " fourth " " 23. 1923 Vol. " No. 28

Subscribed and sworn to before the undersigned this 13 day of Oct 1923.

T. W. Richerson
Clerk Circuit Court.

W. M. Moore
Foreman.

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| SENA FRENCH, COMPLAINANT. | ) | IN THE CIRCUIT COURT OF BALDWIN |
| VS. | ( | COUNTY, ALABAMA. IN EQUITY. |
| ROLAND W. FRENCH, RESPONDENT. | ) ( | NUMBER_____ |

I, Roland W. French, the defendant in the above entitled cause, do hereby accept service and notice of the demand for oral examination of the witnesses on behalf of the complainant in the above entitled cause, and do further accept service and notice of the time and place of taking testimony of said witnesses on behalf of the complainant in this cause, and do further agree that this cause may be submitted for a final decree on the 7 day of September, 1923.

Roland W. French
DEFENDANT.

WITNESS:

M. H. Weeks

SHREVEPORT & RED RIVER R.R. CO. HOUSE TRANSPORTATION

2 CENTS

Mrs. R. C. Glenn

933, N. Carollton Ave

New Orleans

"Exhibit A."

L.

# The Redland Hotel

A. H. GOODSON, MANAGER

NACOGDOCHES, TEXAS, Feb 25 1923

Mrs. R. C. Glenmar

Dear madam

Just a line to find out if Mrs Lena French is at your home and if she is sick as she said she would write and let us know how she was getting along there was a man here from Houston looking for Mr. French he said he sold him a Car and had a Mortgage on it and he said Mr French traided it for the Car he Mortgaged to Mr Goodson here those boys are going to get in

S. Curtis

# The Redland Hotel

A. H. GOODSON, MANAGER

NACOGDOCHES, TEXAS, _____ 192___

serious trouble if they
dart straighten up with
the man from Houston
Mr. French sure treated
Mrs. French terible and
a few of us felt sorry
for her and gave her
enough to go to your
home now I would like
to know how she is or
what happened to her
for we treated her good
and she shure would write
if she were not sick will
you Please answer and let
me know where she is and
if she is well

Respectfully

"Exhibit A."

| | | |
|---|---|---|
| SENA FRENCH, COMPLAINANT. | ) | IN THE CIRCUIT COURT OF BALDWIN COUNTY, |
| | ( | |
| VS. | ) | ALABAMA. IN EQUITY. |
| | ( | |
| ROLAND W. FRENCH, RESPONDENT. | ) | |

Deposition of Sena French, a witness examined on behalf of the complainant in the above entitled cause, taken at the office of the commissioner, in Summerdale, Route 2, Baldwin County, Alabama, under and by virtue of a commission issued out of the Circuit Court of Baldwin County, Alabama, on the 28th. day of September, 1923, for the oral examination of the said witness.

DEPOSITION OF SENA FRENCH.

My name is Sena French. I am the complainant in this case, and was married to Roland W. French, in Baldwin County, Alabama, on November 1st.,1911. We were both more than 21 years of age at the time of the filing of the suit for divorce in this case, and I was at the time of the filing of the suit a bona fide resident of Baldwin County, Alabama, and had been for more than a year next prior to the filing of such suit, and at that time, the respondent, Rolan W.French, resided in New Orleans, Louisiana, and does so reside at this time.

In the summer of 1915, my husband, Roland W. French, struck me with his fist, and knocked me down and I lost consciousness. In the summer of 1919, he again struck me and caught me by the throat in a violent manner. In February, 1922, he struck me several times, IT was about 11 o'clock at night,and I went to see my friend, Mrs. Lowery,and she prayed with me until one o'clock, and advised me to be baptised and leave the matter to God, and I took her advice. I also informed my landlady, Mrs. Shubert, about it, next morning. I did not live with my husband, however, for several months after this, and then concluded to give him one more trial, but after about two months, in December, 1922, he gave me another beating,and I have not lived with him since. On none of these occasions was any one present,and I am unable to produce any witness who saw him mistreat me, but I am attaching hereto as "Exhibit A", a letter of Mr. Curtin, to my aunt, Mrs. Glennon, which will throw some light on the manner in which I was treated. This continued cruelty brought me to a highly nervous state and greatly impaired my health,and I was without fault. My husband not only did not properly maintain me, often leaving me destitute, but did not pay his bills and our disagreements were usually in regard to this. He is an able-bodied man, capable of making a good living and properly supporting me, and I am without means and dependent on my efforts for a support.

Sena S. French.

CERTIFICATE.

STATE OF ALABAMA, )
COUNTY OF MOBILE. )

I, Delia Nygard, the commissioner in the commission hereto attached named,do hereby certify that I am personally acquainted with the said witness, Sena French,and know her to be the identical person named in said commission; that she was duly sworn by me to speak the truth, the whole truth, and nothing but the truth, and examined as above shown, and that her evidence was taken down by me as near as might be,in her own language,and was subscribed by her in my presence, on the 4th. day of October, 1923, at Summerdale, in Baldwin County, Alabama. I further certify that I am neither of counsel nor of kin to any of the parties to this cause, nor in any manner interested in the result thereof.

Witness my hand and seal,this 4th. day of October, 1923.

Delia Nygard (SEAL).
COMMISSIONER.

8568 Commission to Take Depositions on Interrogatories.

# The State of Alabama,

Baldwin County

CIRCUIT COURT.

To Delia Nygard,

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 Sena French,

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

Sena French

is Complainant

and

Roland W French is Defendant,

on oath to be by you administered, upon ~~interrogatories~~ oral examination to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 28th day of September, 1923.

T. W. Richmond

Register.

Commissioners Fee $

Witness Fee's $

No.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT.

Sena French

Complainant

vs.

Roland W. French,

Defendant

COMMISSION TO TAKE DEPOSITION
ON INTERROGATORIES.

COMMISSIONER:

Delia Nygard,

WITNESSES:

Sena French,

C-11-Mer. P. Co.

# The State of Alabama, ~~Mobile~~ BALDWIN County

SENA FRENCH Complainant

No. vs.

ROLAND W. FRENCH Defendant

BALDWIN
**Circuit Court of ~~Mobile~~ County**

IN EQUITY

The Complainant

requests the oral examination of the following named witness

on her behalf, viz.:

Sena French

said witnesses reside in the County of Baldwin

State of Alabama.

Delia Nygard

who reside at Summerdale, Route 2,

is suggested as a suitable person to be appointed Commissioner to take deposition of said

witness on such oral examination

Wilbur Shipman

Solicitor for Complainant.

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No.

BALDWIN

**Circuit Court of ~~Mobile~~ County**

Bay Minette,

~~Mobile~~, Alabama

**IN EQUITY**

Sena French,

Complainant.

vs.

Roland W. French,

Respondent.

DEMAND FOR ORAL EXAMINATION

Filed Apl 28th 1923

T. W. Richmond

Register

RECORDED

RECORDED

8581 NOTE OF TESTIMONY.

Sena French

vs.

Roland W French,

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,

Answer and ggreement to submit and testimony of Sena French.

and in behalf of Defendant upon

T. V. Reilmann

Register

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No.....

THE STATE OF ALABAMA,

BALDWIN COUNTY

IN EQUITY,

CIRCUIT COURT OF BALDWIN COUNTY.

Sara Fennell

vs.

Roland W. Patrick

NOTE OF TESTIMONY.

Filed in Open Court this 13

day of Oct 1923

T. M. Nicrosa

Register