

No. 3944

Equity Action

Milton Saar

vs.

Kate Saar

MUHLENBERG CIRCUIT COURT

Filed

July 15 1913

Decided

Term, 191

App. Docket

Page

Order Book

Page

File Box No.

405 243

Arthur W. ...

Plaintiff's Attorney

Defendant's Attorney

MUHLENBERG CIRCUIT COURT.

Milton Saad,

Plaintiff.

VS)(DEPOSITIONS FOR PLAINTIFF.

Kate Saad,

Defendant.

The deposition of Janie Reed, taken pursuant to notice hereto attached at the law office of Walker Wilkins, in the town of Central City, Muhlenberg County, Kentucky, to be read as evidence on behalf of the plaintiff in the above styled cause in an action now pending in the Muhlenberg Circuit Court. Witness first being duly sworn testifies as follows:

Q. State your age, residence and occupation?

A. Janie Reed, am thirty seven years old, live in Central City Muhlenberg County, Kentucky, and am a housekeeper.

Q. Do you know the plaintiff, Milton Saad and the defendant Kate Saad, is so please state how long you have known them?

A. Yes I know them both and have known them for eight years.

Q. Do you when the plaintiff and defendant were married?

A. Sometime in December, 1907, they were married in Muhlenberg County, Ky.

Q. Did they live together as husband and wife, after their said marriage and if so where did they live, and where have they lived since their separation?

A. Yes they lived together from the time of their said marriage in December 1907, until sometime in August, 1911, they lived in Muhlenber County during that time.

Q. Where have they lived since the time of their separation?

A. They both have lived in Muhlenberg County and are living here now. Kate Saad never lived anywhere ~~in~~ except in Muhlenberg County.

Q. Do you know the cause of their separation?

A. Well I don't know she was too blame for the separation for she just got up and left him and would not live with him and said she never intended to live with him any more and has never lived with him since.

Q. Do you know how he treated her?

A. He treated her just as good as he could treat her.

Q. How did she treat him?

A. She did not treat him very well, she was ill crabbed and was quarrelsome and I heard her say that she was loving another man better than she did Milton, she was so cross and hard to get along with and she finally just got up and left him and they have never lived together since.

Witness
Blanche Gosson

James Feed
mark

Also the deposition of Elias Brutus taken at the same time and place and for the purpose stated in the caption. Witness first being sworn testifies as follows:

Q. State your age, residence and occupation?

A. I am twenty seven, live in Central City, and am engaged in the mercantile business.

Q. Do you know the plaintiff and defendant in this action and if so how long have you known them?

A. Yes I have known them both since 1910.

Q. Were they living together as husband and wife when you first knew them?

A. Yes they were living together in Central City and continued to live together until August, 1911, at which time she left him, and has not lived with him since.

Q. Do you know who was too blame for their separation?

A. Yes when I knew them they got along very badly she was ill and always quarrelsome and mean to him and hard to get along with and she

finally left him and would not live with him any more.

Q. Do you know whether or not she has lived in this county for the last year?

A. Yes she has lived in this County every since I first knew her.

Q. Do you know how he treated her?

A. Yes he treated her as good as he could and tried to get along with her and bought her everything she wanted and done his best but she would not live with him.

Evan Betts

STATE OF KENTUCKY)
MUHLENBERG COUNTY) Sct.

I, Blanche Rosson, a Notary Public in and for the County and State aforesaid, hereby certify that the foregoing depositions of Mrs. Janie Reed and Elias Brutus were taken at the time and place and for the purpose stated in the caption; that said depositions were taken pursuant to the notice hereto attached; that said witnesses were each duly sworn before giving their said depositions; that the same was written by me on the typewriter and then read to and signed by each of said witnesses in person in my presence; that said witnesses were each personally known to me; that plaintiff was present in person and by attorney; that defendant was not present in person nor by attorney.

Given under my hand and seal of office, this the 9th day of August, 1913.

My Commission expires March 4, 1916.

Blanche Rosson

TAXATION OF COST

To taking two depositions in one day	\$3.00
To Writing three pages @ 15¢	.45
To taxation of cost	.30
	<hr/>
	\$ 3.75

Executed this notice on Ktae Saad by delivering to her a true copy hereof.

Aug 2, 1913.

J. L. Rice *attys*

271

Milton Saad

*As per notice to take
depositions.*

Ktae Saad

*I was duly sworn before him and
the deposition was read at
his home in Chicago.*

MUHLENBERG CIRCUIT COURT.

Milton Saad ,

Plaintiff.

VS)(NOTICE TO TAKE DEPOSITION.

Kate Saad,

Defendant.

The defendant, Kate Saad, will take notice that the plaintiff, Milton Saad, will, on Saturday August the 9th, 1913, at the law office of Walker Wilkins, in Central City, Muhlenberg County, Kentucky, proceed to take the depositions of sundry witnesses to be read as evidence in behalf of the plaintiff in the trial of the above styled cause now pending in the Muhlenberg Circuit Court.

The taking of said depositions to begin between the hours of 9:00 A.M. and 4:00 P.M and continue from day to day until through.

Milton Saad

By his attorney,

Walker Wilkins.

SUMMONS IN EQUITY. (Act of Legislature, March 29, 1902.) Printed and Sold by Paragon Printing Works, Beaver Dam, Ky.

The Commonwealth of Kentucky,

TO THE SHERIFF OF Muhlenberg COUNTY:

You are commanded to summon

Kate Saad

to answer, in* ten days after the service of this summons, a petition in equity filed against her in the Muhlenberg Circuit Court, by Milton Saad

and warn her that upon his failure to answer, the petition in equity will be taken for confessed, or she will be proceeded against for contempt, and you will make due return of this summons within* ten days after the service thereof to the Clerk's office of said Court.

Given under my hand, as Clerk of said Court, this 15th day of July 1913

[Signature] Clerk.

By _____ D. C.

*Insert TEN if to county where suit is brought, and TWENTY if out of county.

1907,
atrimony
nce the
in
set
within
his
d lived
heir
efendant
on his
band

and wife since the time of their said separation.

WHEREFORE plaintiff prays judgment against defendant for an absolute divorce and for all proper and equitable relief to which he may appear herein.

Welker Wilkins,
Attorney for plaintiff.

Milton Saad, Piff.

VS) (PETITION IN EQUITY

Kate Saad, Dft.

Filed July 13, 1919

*Sumner v. City
of Louisville*

Pat 243

WALKER WILKINS
Attorney-At-Law
CENTRAL CITY, KY.

07110
2161 2 Sney stuy 'rey of Adoo
copy to her, this Aug 2, 1913
Executed this summer of Kate Saad of Muhlenberg County, Kentucky

MUHLENBERG CIRCUIT COURT.

Milton Saad,

Plaintiff.

VS) (PETITION IN EQUITY.

Kate Saad,

Defendant.

The plaintiff, Milton Saad, states that he and the defendant, Kate Saad, were heretofore on the ___ day of _____ 1907, in Muhlenberg County, Kentucky, united in the holy bonds of matrimony that they were both then are now and have been continually since the time of their said marriage residents, citizens and residing in Muhlenberg County, Kentucky; that the cause of divorce herein set out occurred and existed in Muhlenberg County, Kentucky, and within five years next before the institution of this action; that this plaintiff and defendant after their said marriage as aforesaid lived and cohabited together as husband and wife from the time of their said marriage until the ___ day of _____ 1909, at which time defendant separated left and abandoned this plaintiff without any fault on his part and has not lived together or cohabited together as husband and wife since the time of their said separation.

WHEREFORE plaintiff prays judgment against defendant for an absolute divorce and for all proper and equitable relief to which he may appear herein.

Walker Wilkins,
Attorney for plaintiff.