

I, FRANCES BRANTLEY as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and before Hubert M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witnesses; that I am not of counsel or of kin to any of the parties to said cause, or 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 23rd day of JUNE 1941.

Frances Brantley (L. S.)

No. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

Filed June 24, 1941

A. S. Luck, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

THE STATE OF ALABAMA }
Baldwin County }

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

HAZEL ARD COMPLAINANT

vs.

LAVARNE ARD RESPONDENT

I, FRANCES BRANTLEY

as Registered and Commissioner

have called and caused to come before me HAZEL ARD and GRADY NALL

witnesses named in the requirement for Oral Examination, on the 23rd day of June

194¹, at the office of BEEBE & HALL

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 HAZEL ARD

doth depose and say as follows:

My name is Hazel Ard. I am nineteen years of age and live in Baldwin County, Alabama. The Respondent, Lavarne Ard, is over twenty-one years of age and lives in Baldwin County, Alabama.

The Respondent and I were married at Milton, Florida on June 8th, 1940. We lived together as husband and wife in Baldwin County, Alabama until on to-wit August 8th, 1940; that on to-wit August 8th, 1940 and at various times prior to then while we lived together as husband and wife, the Respondent cursed, threatened and abused me and threatened to commit actual violence to my person which would necessarily have endangered my life and health. The conduct of the Respondent was such as to cause me to have reasonable apprehension to believe and I did actually believe that if I had lived with him he would carry out his threats and do violence to my person which would necessarily endanger my life and health. He has contributed nothing toward my support and manor since I was forced to leave him.

Hazel Ard

GRADY NALL, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Grady Nall. I live at Foley, in Baldwin County, Alabama. I have known the Complainant in the above style since the middle of 1940. She came to Foley to make her home and I have seen her very often since that time. I know that the Respondent has contributed nothing toward the support of the Complainant since she has lived in Foley. The Complainant complained that the Respondent had abused and mistreated her and that it was impossible for her to live with him as his wife. I am a Deputy Sheriff of the County and Marshall of the town of Foley.

Grady Nall

HAZEL ARD,

 Complainant,

 vs.

 Lavarne Ard,

 Respondent.

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 Waiver of Respondent ; commission to take deposition;
 Testimony of Hazel Ard and Grady Nall; Request for Decree
 in Vacation;

and in behalf of Defendant upon Answer and Waiver.

R. S. Rush

Register.

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 193_____

HAZEL ARD _____, Complainant

Vs.

LAVARNE ARD _____, Defendant

To R. S. DUCK _____, 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
by [Signature]

Solicitor for Complainant.

RECORDED

No. _____ Page _____

The State of Alabama,
Baldwin County,
CIRCUIT COURT, IN EQUITY

Vs.

**REQUEST FOR DECREE IN
VACATION**

Filed June 24, 1941

R. S. Dush

Register.

Recorded in _____ Record

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Register.

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this 24

day of June 1947

R. S. Durb

REGISTER

RECORDED

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BILL OF COMPLAINT

HAZEL ARD,
Complainant,

VS.

LAVARNE ARD,
Respondent.

Executed 6/23 1941
 by serving subpoena
 on Lavarne Ard

W.R. Hunt Sheriff
 _____ Deputy Sheriff

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

Filed June 23, 1941
R.S. Dicks, Registrar

BEEBE & HALL
LAWYERS
BAY MINETTE, ALABAMA