

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194__

LULA WILSON

Complainant—

VS.

TRUMAN WILSON

Respondent—

TO R. S. DUCK, REGISTER:

In the above stated cause a Decree pro confesso on personal service
having been filed against _____ the Respondent—,
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 _____,
Solicitor-~~s~~ 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—

The State of Alabama, }
BALDWIN COUNTY.

No. _____ CIRCUIT COURT IN EQUITY.

LULA WILSON

Complainant

vs.

TRUMAN WILSON

Defendant

Motion is hereby made for a Decree Pro Confesso against

TRUMAN WILSON

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 13th day of November 1941

Beulah W. Hance

Solicitor.

LULA WILSON, Complainant,

VS.

TRUMAN WILSON, 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, _____

Motion for Decree pro confesso on personal service, Decree pro confesso on
personal service, Request for Decree in Vacation and Testimony of LULA

WILSON, MOLLIE SEAY, and TOM BLAIR _____

and in behalf of Defendant upon _____

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STATE OF ALABAMA,

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon TRUMAN WILSON to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, 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 LULA WILSON against TRUMAN WILSON, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent 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, R. S. DUCK, Register of said Circuit Court, this 1st day of October, 1941.

R. S. Duck

Register.

LULA WILSON, Complainant,

VS.

TRUMAN WILSON, Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now comes the Complainant, LULA WILSON and humbly complaining against the Respondent, TRUMAN WILSON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both over twenty-one years of age, and residents of Baldwin County, Alabama;

2.

That your Complainant and the Respondent were married in Mobile, Alabama, on September 1st, 1934, and lived together as husband and wife until, to-wit, July 26, 1941;

3.

That the Respondent is a man of high and uncontrollable temper; that on to-wit, July 26, 1941, and at various times prior thereto the Respondent cursed, threatened and abused the Complainant, and on several occasions did violence to her person by striking her several times; that the conduct of the Respondent was such as to cause the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would carry out his threats and do violence to her that would necessarily endanger her life and health; that there was born to the marriage between the

Complainant and the Respondent, a son, JAMES WILSON; that said child is now and has been all of his life, living with his mother, your Complainant; that she has a home at Robertsdale, and is capable, able and willing to care and provide for said child; that the Respondent is working on a dredge boat near Mobile, and rooming in Mobile; that he has no permanent home and is in no place to take and care for the child; that he is not a suitable, fit, or proper person to have the care and control of said child.

Wherefore, the premises considered, the Complainant prays that your Honor will by proper process make the said Respondent, TRUMAN WILSON, party respondent to this Bill of Complaint, requiring him to plead, answer, or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

The Complainant further prays that upon a final hearing of this cause your Honor will make and enter a decree awarding to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent, and awarding to her the said minor child; that your Honor will give and grant unto her such other, further, different, and general relief as she may be in equity and good conscience entitled to receive and as in duty bound she will ever pray.

Lula Wilson
Complainant.

Buber & Haeg
Solicitors for Complainant.

THE STATE OF ALABAMA, }
Baldwin County

CIRCUIT COURT

TO Frances Brantley

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 Lula Wilson, Mollie Seay and Tom Blair

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

LULA WILSON Complainant

and

TRUMAN WILSON Defendant,

on oath to be by you administered, upon

to take and certify the deposition s of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness 13th day of November 1941

R. J. Deuch

REGISTER

Commissioner's Fee \$ _____

Witness' Fees, \$ _____

LULA WILSON

Complainant,

Vs.

TRUMAN WILSON

Respondent.

In the Circuit Court.

In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____

TRUMAN WILSON

by the Sheriff of BALDWIN County, on the 1st day of October

194 1

And it further appears to the Register, that the said _____

TRUMAN WILSON

_____, the Respondent, having to the date hereof, failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,

on motion of BEEBE & HALL, Solicitors

for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,

and it hereby is, in all things taken as confessed against the said _____

TRUMAN WILSON

This 13th day of November, 194 1

Raduc

Register.

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

LULA WILSON

Complainant

VS

TRUMAN WILSON

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on PERSONAL SERVICE 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 Defendant be, and the same are hereby, dissolved, and that the said LULA WILSON is forever divorced from the said

TRUMAN WILSON

for and on account of CRUELTY

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that LULA WILSON be, and ~~they are~~ hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that LULA WILSON the COMPLAINANT pay the cost herein to be taxed, for which execution may issue.

This 24th day of November, 19 41.

J. W. Hare

Judge Circuit Court, in Equity.

I, R.S. DUCK, Register of the Circuit Court of Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.

Witness my hand and seal this the 25th day of November, 19 41

R. S. Duck
Register of Circuit Court, in Equity.

RETURNED

NO. _____

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

LULA WILSON

Complainant

VS.

TRUMAN WILSON

Defendant

Commission To Take Deposition

COMMISSIONER:

Witnesses:

No. Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

.....
.....
.....
vs. Complainant.

.....
.....
.....
Respondent.

DIVORCE DECREE

[Faint, illegible text from the reverse side of the document, including what appears to be a signature and some legal notes.]

No. _____

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

LULA WILSON

Complainant,

Vs.

TRUMAN WILSON

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 19 day of March,
1941.



Register.

RECORDED

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

LULA WILSON, Complainant,

VS.

TRUMAN WILSON, Respondent.

NOTE OF TESTIMONY

Filed in Open Court this 19th

day of June 1934

Richard

REGISTER

RECORDED

No.

Page

**STATE OF ALABAMA,
Baldwin County.**

CIRCUIT COURT, IN EQUITY.

LULA WILSON

Vs.

TRUMAN WILSON

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

Filed *Mar 19* 19*21*

Radner

Register.

Recorded in Record,

Vol. Page

Register.

Baldwin Times Print, Bay Minette.

NO. _____

RECORDED

LULA WILSON

Complainant—

VS.

TRUMAN WILSON

Respondent—

Request For Decree In Vacation

Filed

Aug 19, 194*1*
R. S. Duch

Register.

THE STATE OF ALABAMA }
 Baldwin County }

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

LULA WILSON

COMPLAINANT

vs.

TRUMAN WILSON

RESPONDENT

I, Frances Brantley

as ~~Register and~~ Commissioner

have called and caused to come before me

LULA WILSON, MOLLIE SEAY, and TOM BLAIR

witnesses named in the requirement for Oral Examination, on the 1st day of October,

1941, at the office of Beebe & Hall, Lawyers

in Bay Minette, Alabama, and having first sworn said witnesses to speak the truth, the whole truth, and nothing but the truth, the said

LULA WILSON doth depose and say as follows:

My name is Lula Wilson. I live at Rosinton, in Baldwin County, Alabama, and am over twenty-one years of age. The Respondent, Truman Wilson, is over twenty-one years of age and a resident of Baldwin County, Alabama. The Respondent is at present working in Mobile County, Alabama.

Truman Wilson and I were married in Mobile Alabama, on September 1, 1934. We lived together as husband and wife until on, to-wit, July 26, 1941.

The Respondent, Truman Wilson is a man of high and uncontrollable temper. On several occasions while we were living together as husband and wife, the Respondent cursed, threatened and abused me and on several occasions did actual violence to my person by striking my with his fist. On one particular occasion he jumped on me and beat me until it was necessary for me to be in bed about three weeks, when it was necessary for me to have a Doctor. Dr. Hale of Robertsdale attended me and also Dr. Thrash of Mobile attended me. I was at the time in a family way and it caused me to have a miscarriage. The conduct of the Respondent and his actions toward me are such that I could not live with him as his wife.

We have one child, a son, James Wilson, now five years old and who has been all his life living with me. I live with my grandfather, who has a home in Baldwin County, Alabama. The Respondent has no home of his own and no place to care or provide for the child. He drinks rather heavily from time to time. He is not a suitable or proper person to have the care of the child.

Lula Wilson

My name is Molly Seay. I live at Robertsdale, in Baldwin County, Alabama. I am the mother of the Complainant in the above styled cause. I know of my own personal knowledge that the Respondent ~~on several occasions mistreated the Complainant and many times did violence to her person by striking her and on one particular occasion he mistreated her to the extent that it was necessary for her to be under the Doctor's care and be in bed about three weeks. The Respondent drinks heavily and~~

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 Mr. H. 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 witness es; 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 13th day of November 1941.

Frances Brantley (L. S.)

No. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

LILIA WILSON

COMPLAINANT

vs.

FRUMAN WILSON

RESPONDENT

ORAL DEPOSITION

Filed Nov 14, 1941

Frances Brantley, Register.

RECORDED IN

Record

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Register

when under the influence of liquor, I have often heard him threaten and abuse the Complainant. I know that under the conditions it is absolutely impossible for her to live with him as his wife.

Mollie Seay

My name is Tom Blair. I live at Rosinton, in Baldwin County, Alabama, where I own a home and 50 acres of land, all improved, and 35 acres under cultivation.

The Complainant Lula Wilson is my granddaughter. She is now living with me and in my home. We have plenty room for my granddaughter and her child and she is perfectly welcome to live with us and make our home, her permanent home for herself and minor child.

Tom Blair

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RECORDED

Received in Sheriff's Office
this 1st day of Oct, 1941
W. R. STUART, Sheriff

LULA WILSON, Complainant,

VS.

TRUMAN WILSON, Respondent.

Executed Oct 1st 1941
by serving copy of within Summons and
Complaint on

Truman Wilson

W.R. Stuart Sheriff
By [Signature] Deputy Sheriff

SUMMONS & COMPLAINT.

*Filed October 1st 1941
R.S. [Signature], Register*

BEEBE & HALL

LAWYERS

BAY MINETTE, ALABAMA