

THE STATE OF ALABAMA }
Baldwin County }

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

BESSIE PEARL PENTIS COMPLAINANT

vs.

ORAL PENTIS RESPONDENT

I, FRANCIS BARNLEY

as Register and Commissioner

have called and caused to come before me BESSIE PEARL PENTIS and ALVIN JIMLEY

witness ^{es} named in the requirement for Oral Examination, on the 11th day of October

1941, at the office of BESSIE PEARL PENTIS, LAYERS

in DANVILLE, Alabama, and having first sworn said witness ^{es} to speak the

truth, the whole truth, and nothing but the truth, the said BESSIE PEARL PENTIS

doth depose and say as follows:

I, Francis Brasley 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 the signed the same in the presence of myself and E. H. 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 14th day of October 1941.

Francis Brasley (L. S.)

No. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

Filed October 14, 1941

F. S. Lavelle, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

BESSIE PEARL PETTIS, Complainant,

VS.

ZYAL PETTIS, Respondent.

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

It is hereby stipulated and agreed between the parties in this cause that the Respondent will pay to the Complainant, and the Complainant will accept from the Respondent, the sum of TWELVE (\$12.00) DOLLARS per week as permanent alimony for the care and support of the Complainant and her two minor children, Thomas Howard Pettis, and Mary Ellen Pettis, such amount to be paid on the first and fifteenth days of each and every month after the date of the final decree in this cause.

In witness the parties hereto have hereunto set their hands and seals on this the 11th day of October, 1941.

Bessie Pearl Pettis, (SEAL)

Zyal Pettis (SEAL)

STATE OF ALABAMA

BALDWIN COUNTY

I, Ab M Hall, a Notary Public, in and for said County in said State hereby certify that Bessie Pearl Pettis, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before on this day that she being informed of the contents of the agreement, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 11 day of October, 1941.

Ab M Hall
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

I, Ab M Hall, a Notary Public, in and for said County in said State hereby certify that Zyal Pettis, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before me on this day that he, being informed of the contents of the agreement, executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 11 day of October, 1941.

Ab M Hall
Notary Public, Baldwin County, Alabama.

THE STATE OF ALABAMA,
Baldwin County

}

CIRCUIT COURT

TO Frances Wambley

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 DESSIE PRANK PETERS and ADRIAN WITALEY

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

DESSIE PRANK PETERS Complainant

and

ZYAL PETERS Defendant,

on oath to be by you administered, upon

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

Witness 19th day of October, 1941.

R. L. Durd

REGISTER

Commissioner's Fee \$ _____

Witness' Fees, \$ _____

DEBBIE BEACH POTTIS, Complainant,
vs.
ZYL POTTIS, Respondent.

IN THE CIRCUIT COURT OF
DADE COUNTY, FLORIDA,
IN SUIT.

Now comes the Respondent, ZYL POTTIS, in his own proper person and denies each and every allegation contained in the Bill of Complaint, heretofore filed in the above styled cause, and demands strict proof of the same.

The Respondent waives notice of time of taking testimony on behalf of the Complainant, the right to cross-examine the Complainant's witnesses and agrees that this cause be submitted for final decree without further notice.

Zyl Pottis
Respondent.

WITNESSES:

S. M. Stoll

DESSIE PEARL PATTIS, Complainant,

VS.

RYAL PATTIS, Respondent.

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

It is hereby stipulated and agreed between the parties in this cause that the Respondent will pay to the Complainant, and the Complainant will accept from the Respondent, the sum of TWELVE (\$12.00) DOLLARS per week as permanent alimony for the care and support of the Complainant and her two minor children, Thomas Howard Pattis, and Mary Ellen Pattis, such amount to be paid on the first and fifteenth days of each and every month after the date of the final decree in this cause.

In witness the parties hereto have hereunto set their hands and seals on this the 11th day of October, 1941.

Dessie Pearl Pattis (SEAL)

Ryal Pattis (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, Hunsloe, a Notary Public, in and for said County in said State hereby certify that Dessie Pearl Pattis, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before me on this day that she being informed of the contents of the agreement, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 11th day of October, 1941.

Hunsloe
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA
BALDWIN COUNTY

I, Hunsloe, a Notary Public, in and for said County in said State hereby certify that Ryal Pattis, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before me on this day that he, being informed of the contents of the agreement, executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 11 day of October, 1941.

Hunsloe
Notary Public, Baldwin County, Alabama.

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

Comes your Petitioner, BESSIE PEARL PETTIS and respectfully represents
and shows unto your Honor as follows:

1. That on October 17, 1941, a decree was rendered by this Honorable Court
granting to her a divorce against Zyal Pettis; said cause being numbered 765 on
said docket;

2. That in and as a part of said decree the Respondent Zyal Pettis was required
to pay to the Complainant, Bessie Pear Pettis, as permanent alimony for the support
and maintenance of the Complainant and her minor childred, the sum of Twelve (\$12.00)
Dollars per week;

3. That the said Zyal Pettis has failed or refused to comply with said decree.

Wherefore, the premises considered, said Bessie Pearl Pettis prays that
your Honor will issue citation requiring the said Zyal Pettis to show cause why he
has not complied with terms and conditions of said decree.

Bessie Pearl Pettis,

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority in and for said County, in said State,
personally appeared Bessie Pear Pettis, who is known to me and who having been by me
first duly sworn, deposes and says that the facts contained in the foregoing Petition
are true.

Bessie Pearl Pettis,

Sworn to and subscribed before me on this the 12th day of January, 1942.

HunsLoce
Notary Public, Baldwin County, Ala.

STATE OF ALABAMA,

BALDWIN COUNTY

TO ALL JUSTICES OF THE STATE OF ALABAMA - GREAT C:

WE COMAND YOU, That you summon ZAL PETERS 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 MRS. E. PETERS against ZAL PETERS, 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, H. S. BUCK, Register of said Circuit Court, this 14th day of

October, 1941.

R. S. Buck
Register.

HESSIE BEALL PETTIS, Complainant,

VS.

ZED PETTIS, Respondent.

IN THE DISTRICT COURT OF
DADE COUNTY, ALABAMA,

IN EQUITY.

BEFORE HONORABLE F. W. HARRIS, JUDGE OF DISTRICT COURT OF DADE COUNTY, ALABAMA,
IN EQUITY:

Now comes your Complainant and lawfully complaining, against the Respondent, ZED PETTIS, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both bona-fide residents of Bay Minette, in Baldwin County, Alabama and over twenty-one years of age;

2.

That your Complainant and the Respondent were married at Bay Minette, in Baldwin County, Alabama, on, to-wit: April 8, 1931, and lived together as husband and wife until July 18, 1941;

3.

That on, to-wit: July 18, 1941, and at various times prior thereto, the Respondent abused, threatened and abused the Complainant and often threatened to do violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to cause the Complainant every reasonable apprehension to believe and she did and does actually believe that if she continue to live with the Respondent as his wife, he would carry out his threats and do violence to her person which would necessarily endanger her life and health;

4.

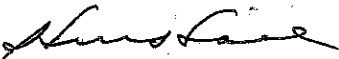
That there were born to the marriage of the Complainant and the Respondent, two children: Thomas Howard Pettis, aged nine; and Mary Ellen Pettis, aged seven; that the said minor children are now and have been all of their lives, living with their mother; that the Respondent is an able bodied man and fully capable of earning and providing for himself, his wife and children; that the Respondent has no home and is not a suitable person to have the care and custody of said minor children;

Therefore, the premises considered, the Complainant prays that your Honor will by proper process seize the said Respondent, ZED PETTIS, part 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 care and control of said minor children: Thomas Howard Pettis, and Mary Ellen Pettis: that a further decree be made and entered awarding to her, such alimony as your Honor may seem proper, according with the allegations contained herein; 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.

EMERY & HILL

BY:



Solicitor for Complainant.

EXHIBIT

Answer & Waiver

*Filed October 14, 1941
R.S. Arch, Registrar*

765 -

Filed 112-47

R. S. Duck

~~RECORDED~~

Agreement

Filed October 14, 1941
R. L. French, Registrar

765 -

Equity

Bessie Pearl Pettis.

VS

Zyal Pettis.

Sum on Zyal Pettis

Executed this 30th day of Jan 19 42

By executing the within

named Defendant

Zyal Pettis and

Serving a copy of the within
writ on him

and placing him in jail

W.B. Smith
Sheriff

A.P. H
D. S.

*Sum 150
amt 100
122 100*

RECORDED

Bill of Complaint.

Filed October 14, 1941
R. E. Luck, Registrar

DESSIE PEARL PATTIS

VS.

ZHAL PATTIS

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 the Respondent, Agreement of Complainant and Respondent

as of Alimony, and Testimony of Bessie Pearl Pattis and Adelle Quinley

and in behalf of Defendant upon _____

R.S. Hurd

Register.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194_____

BESSIE PEARL FORTIS

Complainant—

VS.

EMIL FORTIS

Respondent—

TO R. S. DUCK, REGISTER:

In the above stated cause a n ~~answer and waiver~~ _____
having been _____ filed _____ 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^s for Complainant—

NO. _____

Complainant _____

VS.

Respondent _____

Request For Decree In Vacation

Filed October 14, 1947

R. S. Shuck

Register.

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this 14th

day of October 1931

R. S. [Signature]

REGISTER

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BESSIE PEARL PETTIS

Complainant

VS

ZYAL PETTIS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Answer and Waiver 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 BESSIE PEARL PETTIS is forever divorced from the said

ZYAL PETTIS

for and on account of cruelty

It is further ordered, adjudged, and decreed that the Complainant shall have she is hereby awarded the care, custody and control of the minor children; Thomas Howard Pettis and Mary Ellen Pettis.

It is further ordered, adjudged, and decreed by the court that the Respondent pay the Complainant as permanent alimony for the maintenance and support of the Complainant and the said minor children, Thomas Howard Pettis, and Mary Ellen Pettis, the sum of twelve (\$12.00) Dollars per week, payable on the first and fifteenth of each month hereafter.

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 the Complainant and the Respondent be, and they hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that ZYAL PETTIS the Respondent pay the cost herein to be taxed, for which execution may issue.

This 16th day of October, 1941

F. W. Stone
Judge Circuit Court, in Equity.

I, _____, 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 _____ day of _____, 19 _____

Register of Circuit Court, in Equity.

No. 765 Page

The State Of Alabama
Baldwin County

In Circuit Court, In Equity

Bessie Pearl Pettis
vs. Complainant.

Zyal Pettis

Respondent.

DIVORCE DECREE

Filed October 17, 1941
R. S. French, Register