

HYBART, CHASON & CHASON

ATTORNEYS AT LAW

FOLEY, ALABAMA

March 27, 1942.

C. L. HYBART
J. CHASON
C. G. CHASON

Mr. Bob Duck,
Bay Minette,
Alabama.

Dear Bob:

This is the matter that I told you about
where I want you to try to get the costs out of
them, if it is impossible, I will send you a
check for \$10.00.

Thank you.



C. G. CHASON.

784

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

CHRISTINA WILLIS Complainant
VS
AUDLEY WILLIS Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decress 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 CHRISTINA WILLIS is forever divorced from the said

AUDLEY WILLIS
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 CHRISTINA WILLIS be, and she hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that CHRISTINA WILLIS the Complainant pay the cost herein to be taxed, for which execution may issue.

This 31st day of March, 1942.
F. W. Hare
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.

The State of Alabama, }
Baldwin County }

CIRCUIT COURT

To JETTIE TERRELL

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 Christina Willis and Anna Belle Fell

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

Christina Willis is

Complainant

and

Audley Willis is

Defendant,

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

Witness 21st day of February 19 42

R. S. Duck

REGISTER

COMMISSIONER'S FEE, \$ Paid

WITNESS' FEES, \$ None

CHRISTINA WILLIS

Complainant

-vs-

AUDLEY WILLIS

Respondent

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

Come your Complainant, Christina Willis, and exhibits this, her Bill of Complaint for divorce against Audley Willis and shows unto your Honor and this Court as follows:-

FIRST:

That your Complainant is over the age of twenty-one years and is a bona fide resident of the State of Alabama, having therein resided for more than ten years, her present address being Lillian, Alabama; that the Respondent is a resident of Baldwin County, Alabama and is over the age of Twenty-one years.

SECOND:

That your Complainant and the Respondent were married on, heretofore, to-wit, February 28, 1938 and lived together as man and wife until December 20, 1940 when because of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that the Respondent after marriage became addicted to habitual drunkenness so that it was impossible for your Complainant to live with him; that on several occasions before separation and while drunk, Respondent struck your Complainant with his fist and committed other actual violence on her person, attended with danger to her life and health; that he used abusive and offensive language and threatened her with violence; that the Respondent has contributed nothing to the support of your Complainant for over two years

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, your Complainant prays that

(Page One)

Audley Willis be made a party defendant to this cause by the usual process of this Honorable Court requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Complainant be granted a divorce from the said Respondent; and that your Complainant be given the right to remarry. Should your Complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled, and as in duty bound she will every

BILL OF COMPLAINT.

Complainant,
prayer

ANDREW WILLIS,

Respondent.

IN THE CIRCUIT COURT OF

THE FIRST JUDICIAL CIRCUIT, ALABAMA.

IN EQUITY.

LITTLE BERRY, N.S., T.S.

Solicitors for Complainant.

CHRISTINA WILLIS)

Complainant,)

-vs-)

AUDLEY WILLIS)

Respondent.)

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

Comes the Respondent, AUDLEY WILLIS, and denies the allegations of the Complaint and each and every count thereof filed in the above styled cause, and demands strict proof thereof. The Respondent waives services, taking of testimony, and notice of submission of said cause.

Audley Willis

CHRISTINA WILLIS

Complainant

-vs-

AUDLEY WILLIS

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Comes your Complainant, Christina Willis, and exhibits this, her Bill of Complaint for divorce against Audley Willis and shows unto your Honor and this Court as follows:-

FIRST:

That your Complainant is over the age of twenty-one years and is a bona fide resident of the State of Alabama, having therein resided for more than ten years, her present address being Lillian, Alabama; that the Respondent is a resident of Baldwin County, Alabama and is over the age of Twenty-one years.

SECOND:

That your Complainant and the Respondent were married on, heretofore, to-wit, February 28, 1938 and lived together as man and wife until December 20, 1940 when because of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that the Respondent after marriage became addicted to habitual drunkenness so that it was impossible for your Complainant to live with him; that on several occasions before separation and while drunk, Respondent struck your Complainant with his fist and committed other actual violence on her person, attended with danger to her life and health; that he used abusive and offensive language and threatened her with violence; that the Respondent has contributed nothing to the support of your Complainant for over two years

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, your Complainant prays that

(Page Two)

Audley Willis be made a party defendant to this cause by the usual process of this Honorable Court requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Complainant be granted a divorce from the said Respondent; and that your Complainant be given the right to remarry. Should your Complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled, and as in duty bound she will ever pray.

Robert Mason & Mason
Solicitors for Complainant.

The State of Alabama,
Baldwin County.

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

CHRISTINA WILLIS Complainant.

VS.

AUDLEY WILLIS Respondent.

I, ~~Jettie Terrell~~.....

as ~~Register and~~ Commissioner

have called and caused to come before me Christina Willis and Anna Belle Fell

.....
.....
.....

witness, as named in the Requirement for Oral Examination, on the 21st day of February,

1922, at the office of Hybert, Chason & Chason,

in Foley, Alabama, and having first sworn said witness as to speak the

truth, the whole truth, and nothing but the truth, the said Christina Willis and

Anna Belle Fell doth depose and say as follows:

.....

My husband and I were married on February 28, 1938 and lived

together until December 20, 1940. My husband stayed drunk

all the time, wouldn't work, and every time he got some money

he would spend it for liquor. When he would be drunk he would

threaten me and call me all kinds of ugly names. I would try

to make him behave himself and he would hit me. He wouldn't

have been so bad if he would have stayed sober. He didn't drink

before we were married, or if he did, I didn't know about it.

He got so bad with his drinking that I was supporting both of

us, and just couldn't stand it with him hitting me and cursing

me and threatening to kill me. He hasn't given me any money

at all for over two years. I was supporting him and myself

long before that time. My home is in Lillian, Alabama, and I

have lived there all my life. I am 45 years old.

.....
Christina Willis
.....
.....
.....

ORAL EXAMINATION.

I, Jettie Terrell, 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 witnesses and read over to them and they signed the same in the presence of myself and C. G. Chason, 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 21st day of February, 1922.

Jettie Terrell (L. S.)

NO. 784 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent

Oral Deposition

Filed 3 - 30, 1922

R. S. Buck, Register.

Recorded in

Record

Vol. Page

Register

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194__

CHRISTINA WILLIS,

Complainant—.

VS.

AUDLEY WILLIS,

Respondent—.

TO R. S. DUCK, REGISTER:

In the above stated cause a Bill of Complaint and Answer

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 Hybart, Chason & Chason,

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.

Hybart, Chason & Chason
Solicitor^s for Complainant—.

8581 NOTE OF TESTIMONY

CHRISTINA WILLIS

COMPLAINANT,

vs.

AUDLEY WILLIS,

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,

and request for
Testimony of Christina Willis and Anna Belle Fell ~~as required~~
~~for~~ decree in vacation.

and in behalf of Defendant upon

Robert Chasen & Chasen
Solicitors for Complainant ~~Register~~

RECORDED

No. 7844

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

VS

NOTE OF TESTIMONY

Filed in Open Court this 30th

day of March 1942

R. S. Duck
Register

NO. 784

Complainant—

VS.

Respondent—

Request For Decree In Vacation

Filed 3-30, 1942

R. S. Duck

Register.

RECORDED