

812

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

GRADY WILSON

Complainant

VS

LUCILE HINOTE 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 GRADY WILSON is forever divorced from the said

LUCILE HINOTE WILSON

for and on account of

Infidelity

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 Grady Wilson

be, and he is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Grady Wilson

the Complainant pay the cost herein to be taxed, for which execution may issue.

This 14th day of November, 1942.

A. W. Hase
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. Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

GRADY WILSON
vs. Complainant.

LUCILLE HINOME WILSON
Respondent.

DIVORCE DECREE

Filed Nov 18 1942

That the Court has considered the pleadings and the evidence and finds that the same are sufficient to justify the granting of a divorce to the complainant and the respondent.

Wherefore the Court doth and does hereby grant a divorce to the complainant from the respondent with all the usual incidents thereof.

It is the order of the Court that the complainant shall have custody of the child herein named and that the respondent shall pay the cost of maintenance and support of the child herein named to the complainant.

The Court doth hereby award to the complainant the sum of \$100.00 as and for the costs of this suit.

Witness my hand and seal this 15th day of November 1942.

Clerk of the Court

Grady Wilson,)	
Complainant,)	
)	
vs)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
)	IN EQUITY.
Lucile Hinote Wilson,)	
Respondent.)	

TO THE HONORABLE F. W. HARE, JUDGE OF SAID COURT:

Now comes Lucile Hinote Wilson, the respondent, and for answer to the bill of complaint filed herein against hereby Grady Wilson, the complainant, says and alleges as follows:

1. She admits the allegations of paragraph 1 of the said bill of complaint.

2. She admits the allegations of paragraph 2 of the said bill of complaint.

3. She denies the allegations of paragraph 3 of the said bill of complaint and alleges that the allegations contained therein are false and untrue. She further alleges that she and respondent lived together as man and wife until, to-wit: the 15th day of March, 1942, on which said last date the respondent, aided by his mother, forced respondent to leave ~~leave~~ their home. She further alleges that one child, Dennis Earl Wilson, who is under one year of age, was born to complainant and respondent, and, further, that she, respondent, is again pregnant with unborn child by the complainant, who well knows that respondent has not committed adultery as set out in said bill of complaint. Respondent further alleges that she always acted toward complainant as a dutiful wife should.

And, by way of cross-bill, the said Lucile Hinote Wilson, as cross-complainant, brings this her cross-bill, without waiving any benefits of her foregoing answer, against the said Grady Wilson, as cross-respondent, and alleges and represents unto the Court and your Honor as follows:

A. Cross-complainant and cross-respondent are each over the age of twenty-one years and reside in Baldwin County, Alabama.

B. The cross-complainant and the cross-respondent were lawfully married to each other on, to-wit: and lived together as man and wife until, to-wit: March 15, 1942, when cross-respondent forced cross-complainant to leave their home, and they have not lived together as man and wife, or otherwise, since said last date.

C. One child, a son whose name is Dennis Earl ~~Wilson~~ and who is under the age of one year, was born to Cross-complainant and cross-respondent. The said child is in the custody and under the control of cross-complainant. Cross-complainant is again pregnant with unborn child by cross-respondent, the expected birth of said unborn child to occur

in approximately seven months from the filing of this her answer and cross-bill.

D. Your cross-complainant is without any means of support and unable to work or earn a livelihood, is dependent for herself and child upon relatives for support and is in destitute circumstances. The cross-respondent is a strong and able-bodied man, makes upwards of \$150.00 per month regularly and is well able to care for and support cross-complainant and their said child and to provide them with proper medical attention and services.

E. It has been and is necessary for cross-respondent to employ a solicitor or attorney to represent her in this cause, that she has employed H. E. Smith, an attorney at law of Bay Minette, Alabama, to so represent her, and that for services rendered in so representing her the said H. E. Smith as such solicitor is entitled to a reasonable compensation or fee.

WHEREFORE, the premises considered, the said Lucile Hinote Wilson as cross-complainant prays that your Honor will order or decree a reference to the Register of this Court to ascertain and report to your Honor what is or would be a reasonable amount or amounts to be allowed cross-complainant as alimony pendente lite, a reasonable amount to be allowed the said H. E. Smith as solicitor's fee, and a reasonable amount or amounts to be allowed cross-complainant as and for permanent alimony; and, that Your Honor will order and decree that the said Grady Wilson to pay to the said Lucile Hinote Wilson such amount or amounts as to your Honor may seem just as alimony pendente lite, for solicitor's fee and as permanent alimony. And the said Lucile Hinote Wilson prays your Honor and the Court for all such other and further orders, decrees and relief as in Equity she may be entitled to receive.

H. E. Smith
as Solicitor for respondent
and cross-complainant, Lucile
Hinote Wilson.

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

Grady Wilson

Complainant,

Vs.

Lucile Hinote 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 _____

Lucile Hinote Wilson

by the Sheriff of Baldwin County, on the _____ day of _____, 194_____.

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

Lucile Hinote 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 _____

Lucile Hinote Wilson

This 11 day of May, 194_____

[Handwritten Signature]

Register.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon LUCILE HINOTE WILSON to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction within thirty days after the service of this summons, and there to answer, plead, or demur, without oath, to a Bill of Complaint lately exhibited by GRADY WILSON against said LUCILE HINOTE WILSON, and further to do and perform what said Judge shall order, and direct in that behalf, and this the 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 the 4
day of April, 1942.

R. S. Duck
Register.

GRADY WILSON, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

LUCILE HINOTE WILSON, RESPONDENT.

IN EQUITY.

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

And now comes your Complainant, GRADY WILSON, and humbly complaining against the Respondent, LUCILE HINOTE WILSON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant and the Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age;
2. That the Complainant and the Respondent were married at Pensacola, Florida, on November 2, 1940;
3. That on, to-wit, immediately prior to November 23, 1940, the Respondent committed the act of adultery with one Chester Wilson; that said acts of adultery were without the consent or approval of the Complainant and that the Complainant has not condoned said acts.

Wherefore, the premises considered, the Complainant prays that this Honorable Court will by proper process make the said LUCILE HINOTE WILSON party respondent to this Bill of Complaint and by appropriate orders, require her 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.

Complainant further prays that upon a final hearing of this cause, your Honor will give and grant unto him a decree of absolute divorce, forever barring the bonds of matrimony existing between him and the Respondent; that he be granted

such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL,

By: *W. H. Hall*
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 Grady Wilson and Carlous Phillips

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

Grady Wilson Complainant

and

Lucile Hinote 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 14 day of Jan, 1914

Richard

REGISTER

Commissioner's Fee \$ _____

Witness' Fees, \$ _____

No. _____

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

Grady Wilson

Complainant,

Vs.

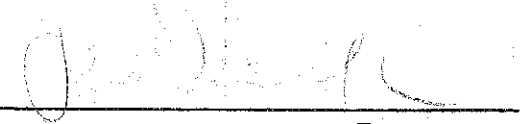
Lucile Hinote Wilson

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 11 day of Mar,

1945



Register.

RECORDED

NO. _____

THE STATE OF ALABAMA
Baldwin County
CIRCUIT COURT

Grady Wilson
Complainant

VS.

Lucile Hincote Wilson
Defendant

Commission To Take Deposition

COMMISSIONER:

Witnesses:

218

Received in Sheriff's Office
this 4 day of April, 1942
W. R. STUART, Sheriff

Executed 4-10 1942

by serving copy of within Summons and
Complaint on

Lucile Hinote Wilson

W. R. Stuart Sheriff
B. J. Starnes Deputy Sheriff

813
RECORDED

GRADY WILSON, COMPLAINANT,

VS.

LUCILE HINOTE WILSON, RESPONDENT.

SUMMONS AND BILL OF COMPLAINT.

File April 4 1942
Radner
Ray

Beebe & Hall, Lawyers,
Bay Minette, Alabama.

RECORDED

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Grady Wilson,
Complainant,

vs

Lucile Hinote Wilson,
Respondent.

ANSWER AND CROSS-BILL.

Filed May 12th, 1942

A. S. Dyer
Register.

Grady Wilson,)	
Complainant,)	
)	
vs)	IN THE CIRCUIT COURT OF
)	BALDWIN COUNTY, ALABAMA
)	IN EQUITY.
Lucile Hinote Wilson,)	
Respondent.)	

TO THE HONORABLE F. W. HARE, JUDGE OF SAID COURT:

Now comes Lucile Hinote Wilson, the respondent, and for answer to the bill of complaint filed herein against hereby Grady Wilson, the complainant, says and alleges as follows:

1. She admits the allegations of paragraph 1 of the said bill of complaint.
2. She admits the allegations of paragraph 2 of the said bill of complaint.
3. She denies the allegations of paragraph 3 of the said bill of complaint and alleges that the allegations contained therein are false and untrue. She further alleges that she and respondent lived together as man and wife until, to-wit: the 15th day of March, 1942, on which said last date the respondent, aided by his mother, forced respondent to leave ~~leave~~ their home. She further alleges that one child, Dennis Earl Wilson, who is under one year of age, was born to complainant and respondent, and, further, that she, respondent, is again pregnant with unborn child by the complainant, who well knows that respondent has not committed adultery as set out in said bill of complaint. Respondent further alleges that she always acted toward complainant as a dutiful wife should.

And, by way of cross-bill, the said Lucile Hinote Wilson, as cross-complainant, brings this her cross-bill, without waiving any benefits of her foregoing answer, against the said Grady Wilson, as cross-respondent, and alleges and represents unto the Court and your Honor as follows:

- A. Cross-complainant and cross-respondent are each over the age of twenty-one years and reside in Baldwin County, Alabama.
- B. The cross-complainant and the cross-respondent were lawfully married to each other on, to-wit: and lived together as man and wife until, to-wit: March 15, 1942, when cross-respondent forced cross-complainant to leave their home, and they have not lived together as man and wife, or otherwise, since said last date.
- C. One child, a son whose name is Dennis Earl ~~Wilson~~ and who is under the age of one year, was born to Cross-complainant and cross-respondent. The said child is in the custody and under the control of cross-complainant. Cross-complainant is again pregnant with unborn child by cross-respondent, the expected birth of said unborn child to occur

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon LUCILE HINOTE WILSON to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction within thirty days after the service of this summons, and there to answer, plead, or demur; without oath, to a Bill of Complaint lately exhibited by GRADY WILSON against said LUCILE HINOTE WILSON, and further to do and perform what said Judge shall order, and direct in that behalf, and this the 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 the 7
day of April, 1942.

R. S. Duck
Register.

GRADY WILSON, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

LUCILE HINOTE WILSON, RESPONDENT.

IN EQUITY.

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

And now comes your Complainant, GRADY WILSON, and humbly complaining against the Respondent, LUCILE HINOTE WILSON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant and the Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age;
2. That the Complainant and the Respondent were married at Pensacola, Florida, on November 2, 1940;
3. That on, to-wit, immediately prior to November 23, 1940, the Respondent committed the act of adultery with one Chester Wilson; that said acts of adultery were without the consent or approval of the Complainant and that the Complainant has not condoned said acts.

Wherefore, the premises considered, the Complainant prays that this Honorable Court will by proper process make the said LUCILE HINOTE WILSON party respondent to this Bill of Complaint and by appropriate orders, require her 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.

Complainant further prays that upon a final hearing of this cause, your Honor will give and grant unto him a decree of absolute divorce, forever barring the bonds of matrimony existing between him and the Respondent; that he be granted

Copy

Grady Wilson,
Complainant,

vs

Lucile Ninote Wilson,
Respondent.

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

TO THE HONORABLE F. W. HARR, JUDGE OF SAID COURT:

Now comes Lucile Ninote Wilson, the respondent, and for answer to the bill of complaint filed herein against her by Grady Wilson, the complainant, says and alleges as follows:

1. She admits the allegations of paragraph 1 of the said bill of complaint.
2. She admits the allegations of paragraph 2 of the said bill of complaint.
3. She denies the allegations of paragraph 3 of the said bill of complaint and alleges that the allegations contained therein are false and untrue. She further alleges that she and respondent lived together as man and wife until, to-wit: the 15th day of March, 1942, on which said last date the respondent, aided by his mother, forced respondent to leave ~~their~~ their home. She further alleges that one child, Dennis Earl Wilson, who is under one year of age, was born to complainant and respondent, and, further, that she, respondent, is again pregnant with unborn child by the complainant, who well knows that respondent has not committed adultery as set out in said bill of complaint. Respondent further alleges that she always acted toward complainant as a dutiful wife should.

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- B. The cross-complainant and the cross-respondent were lawfully married to each other on, to-wit: and lived together as man and wife until, to-wit: March 15, 1942, when cross-respondent forced cross-complainant to leave their home, and they have not lived together as man and wife, or otherwise, since said last date.
- C. One child, a son whose name is Dennis Earl ~~Wilson~~ and who is under the age of one year, was born to Cross-complainant and cross-respondent. The said child is in the custody and under the control of cross-complainant. Cross-complainant is again pregnant with unborn child by cross-respondent, the expected birth of said unborn child to occur

in approximately seven months from the filing of this her answer and cross-bill.

D. Your cross-complainant is without any means of support and unable to work or earn a livelihood, is dependent for herself and child upon relatives for support and is in destitute circumstances. The cross-respondent is a strong and able-bodied man, makes upwards of \$150.00 per month regularly and is well able to care for and support cross-complainant and their said child and to provide them with proper medical attention and services.

E. It has been and is necessary for cross-respondent to employ a solicitor or attorney to represent her in this cause, that she has employed H. E. Smith, an attorney at law of Bay Minette, Alabama, to so represent her, and that for services rendered in so representing her the said H. E. Smith as such solicitor is entitled to a reasonable compensation or fee.

WHEREFORE, the premises considered, the said Lucile Hinote Wilson as cross-complainant prays that your Honor will order or decree a reference to the Register of this Court to ascertain and report to your Honor what is or would be a reasonable amount or amounts to be allowed cross-complainant as alimony pendente lite, a reasonable amount to be allowed the said H. E. Smith as solicitor's fee, and a reasonable amount or amounts to be allowed cross-complainant as and for permanent alimony; and, that Your Honor will order and decree that the said Grady Wilson to pay to the said Lucile Hinote Wilson such amount or amounts as to your Honor may seem just as alimony pendente lite, for solicitor's fee and as permanent alimony. And the said Lucile Hinote Wilson prays your Honor and the Court for all such other and further orders, decrees and relief as in Equity she may be entitled to receive.

H. E. Smith

as Solicitor for respondent
and cross-complainant, Lucile
Hinote Wilson.