

1035

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

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

Your Oratrix, Rosa Mae Passmore, respectfully represents and  
shows unto Your Honor as follows:-

FIRST:

That she is a bona fide resident citizen of Baldwin County, Alabama,  
residing at Elberta, Alabama, and has resided in Baldwin County, Alabama,  
for more than three years next preceeding the filing of this bill; that she  
is over the age of eighteen years.

SECOND:

That W. A. Passmore is a resident citizen of Baldwin County, Alabama,  
residing at Robertsdale, Alabama; that he has resided in Baldwin County,  
Alabama, for more than three years next preceeding the filing of this bill;  
that he is over the age of twenty-one years.

THIRD:

That Your Oratrix and the said W. A. Passmore were lawfully married,  
on to-wit:- During the month of May, 1927, and lived together as husband and  
wife until, to-wit:- the month of July, 1931, at which time the said W. A.  
Passmore committed actual violence on your Oratrix attended with danger to  
her life or health and that from the conduct of the said W. A. Passmore,  
she had reasonable apprehension of such violence as to endanger her life or  
health; that the said act was committed in Baldwin County, Alabama.

THE PREMISES CONSIDERED, Your Oratrix, respectfully prays that  
the said W. A. Passmore be made party respondent to this bill of complaint  
by the usual process of this Honorable Court; that such orders, decrees and  
publications be made as necessary to perfect service on the said W. A. Passmore,  
and that he be required to demur, plead to or answer the same within the time

and under the penalties as provided by law, or that the same be forever confessed.

PRAYER FOR RELIEF:


That upon the final hearing of this cause your Honor will grant unto Your Oratrix an absolute divorce from the said W. A. Passmore.

That if your Oratrix is mistaken in the relief prayed for, then your Honor will grant unto her such other, further, different and general relief as she may in justice and equity be entitled, she will ever pray, etc.,

  
HENRY D. MOORE,  
Attorney for Complainant.

FOOTNOTE:

Defendant is required to answer every allegation contained in the foregoing bill, paragraph one to three, inclusive, but not under oath. Answer under oath is hereby expressly waived.

  
HENRY D. MOORE,  
Attorney for Complainant.

The State of Alabama }  
Baldwin County

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

Rosa Mae Passmore COMPLAINANT

VS.

W. A. Passmore RESPONDENT

I, \_\_\_\_\_

as Register and Commissioner \_\_\_\_\_

have called and caused to come before me Rosa Mae Passmore  
A. Cleora Stearnford

witness named in the Requirement for Oral Examination, on the 3rd day of May

1932, at the office of Register

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

\_\_\_\_\_ doth depose and say as follows:

"Testimony of Rosa Mae Passmore"

My name is Rosa Mae Passmore; I am over 21 years of age and have lived in Baldwin County all my life. I live at Elberta, Alabama.

W. A. Passmore is my husband; we were married during the month of May 1927, and lived together as man and wife until July 1931, at the time we separated. At this time my husband W. A. Passmore struck me with his fist 3 times; I had to be treated by Dr. Sibley Holmes. Due to the conduct of W. A. Passmore my life and health was endangered; he struck and injured me causing me to have to stay in bed for two weeks and under the treatment of the doctor; he was constantly threatening my life. From the conduct of the said W. A. Passmore I had reasonable apprehension of such violence as to endanger my life and health. The act was committed in Baldwin County, Alabama.

W. A. Passmore is over 21 years of age and lives at Robertsdale, Alabama. He has lived in Baldwin County for more than the past five years.

Rosa Mae Passmore

ROSA MAE PASSMORE

vs.

W.A. PASSMORE

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,  
~~testimony of Rosa Mae Passmore and Clara Stanford,~~

and in behalf of Defendant upon

*D. W. Riceman*

Register.

ROSA MAE PASSMORE,  
Complainant,

vs.

W. A. PASSMORE,  
Defendant.

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

Comes W. A. Passmore, defendant, in the above styled cause and for answer to same denies each and every allegation contained therein and demands strict proof of same. He waives service of subpoena by the Sheriff to take testimony on oral or written examination as well as the right to cross examine, and consents that this cause be submitted for decree on note of testimony made by the Register either in term time or vacation.

Dated this 28<sup>th</sup> day of April, 1932.

W. A. Passmore

ATTEST:

Henry D. Moore

\_\_\_\_\_

*Handwritten notes:*  
W. A. Passmore  
28<sup>th</sup> April  
1932

The State of Alabama, }  
Baldwin County

CIRCUIT COURT OF BALDWIN COUNTY,  
IN EQUITY

To Any Sheriff of the State of Alabama---GREETING:

WE COMMAND YOU, That you summon W.A. Passmore,

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, 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

Rosa Mae Passmore,

against said W.A. Passmore,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant 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, T. W. Richerson, Register of said Circuit Court, this 28th day of

April 1932

T. W. Richerson Register.

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

CAMILLA ROBERTS WOOD,  
Complainant,  
vs  
GEORGE RAYMOND WOOD,  
Respondent.

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA. IN EQUITY.  
No. \_\_\_\_\_

Comes the respondent and for answer to the bill of  
complaint filed in this cause says that the charges made  
in Third Paragraph of the bill of complaint are untrue.

*Gordon Eustace Leigh*  
SOLICITOR FOR RESPONDENT.

THE STATE OF ALABAMA, BALDWIN COUNTY.

CAMILLA WOOD,

Complainant,

vs

GEORGE RAYMOND WOOD,

Respondent.

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

No. 1035-

This cause is submitted for decree on the pleadings and the testimony as shown by the note of submission on file and on consideration it is ordered, adjudged and decreed by the court that the complainant is entitled to relief and that the bonds of matrimony heretofore existing between the complainant and respondent be and the same are henceforth dissolved and annulled.

It is further ordered, adjudged and decreed that the complainant, Camilla Wood be and she is hereby permitted to contract marriage subject to such provisions of the law as regulate the marriage of divorced persons but in no event before the expiration of sixty days after the rendition of this decree.

It is further ordered, adjudged and decreed that the custody of the two minor children, George Raymond Wood and Margaret Camilla Wood, shall be and hereby is awarded to the complainant, Camilla Wood, but that the respondent, George Raymond Wood, shall be given and shall have the right to visit the said children at all convenient times. The court shall retain jurisdiction of the custody of the children for such other and further orders as the welfare of said minor children shall demand.

It is further ordered, adjudged and decreed that the respondent shall pay to the complainant as alimony for her support the sum of Fifteen and 00/100 (\$15.00) dollars per month commencing from the commencement of this suit, such payments to be made monthly on the tenth day of each month and that he shall forthwith pay to B. F. McMillan, Jr., as solicitor for complainant the sum of Thirty-five and 00/100 (\$35.00) dollars, that being a reasonable fee for the prosecution of this suit.

It is further ordered, adjudged and decreed that the court shall retain jurisdiction of this cause as to the alimony awarded to complainant for the purpose of increasing or reducing the amounts to be paid by the respondent as his financial condition may justify.

It is further ordered, adjudged and decreed that the respondent, George Raymond Wood shall pay the costs of this proceeding for which let execution issue.

IN TERM TIME this 12<sup>th</sup> day of May, 1932.

J. W. Lane  
JUDGE

OK  
Jordan Emory B. B. B.  
Always for Ruffin.



CAMILLA ROBERTS WOOD,  
Complainant,  
vs  
GEORGE RAYMOND WOOD,  
Respondent.

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

No. \_\_\_\_\_

It is agreed that a reference to determine reasonable alimony and solicitor's fees is hereby expressly waived, that the final decree in this cause may grant to complainant the sum of <sup>fifteen</sup> ~~ten~~ dollars a month alimony, such decree to provide that the amount of permanent alimony shall remain in the breast of the court to be increased or reduced as future conditions of the respondent may justify, that the costs of this proceeding are to be taxed against the respondent except that he is not to be taxed with the complainant's solicitor's fees in the sum of Thirty-Five and 00/100 (\$35.00) dollars.

Dated this <sup>14<sup>th</sup></sup> day of April, 1932.

Camilla Wood

George Raymond Wood

Camilla Roberts Wood

vs.

George Raymond Wood

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY,  
CIRCUIT COURT OF BALDWIN COUNTY.

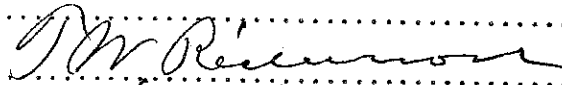
Amended

This cause is submitted in behalf of Complainant upon the ~~original~~ Bill of Complaint,

answer and agreement, deposition of Camilla Wood, Kathleen

Dixon Dryer

and in behalf of Defendant upon



Register.

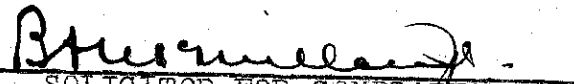
CAMILLA WOOD,  
Complainant,  
vs  
GEORGE RAYMOND WOOD,  
Respondent.

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

No. \_\_\_\_\_

It is agreed between the parties or counsel that the depositions of Camilla Wood and Kathaleen Dixon Dryer may be taken before Ruth Macdonald, acting as commissioner and the evidence as so taken submitted without the issuance of commission. The issuance of commission and signatures of the witnesses being hereby expressly waived.

Dated this 20th day of April, 1932.

  
SOLICITOR FOR COMPLAINANT.

  
SOLICITOR FOR RESPONDENT.

Deposition of Camilla Wood.

1st. My name is Camilla Wood. I am 32 years of age and I am complainant in this case. The respondent, George Raymond Wood is 35 years of age. Both of us are bona fide residents of Fairhope in Baldwin County, Alabama, and have been such residents continuously for more than ten years before the bill of complaint in this case was filed.

2nd. George Raymond Wood, the respondent and I were married to each other in Fairhope, Baldwin County, Alabama, on March 30th, 1924 and we lived together as man and wife until the latter part of 1931, at which time we separated and since when we have not lived together.

3rd. While I was living with the respondent as his wife he was very cruel to me and the language he used to me and his treatment of me became intolerable. On one occasion he struck me in the face and the place was discolored for days and on many occasions he pinched me until it drew the blood. His language to me and in the presence of our children on numerous occasions was very profane. He left our home and went to live at his mother's

B. F. McMILLAN, JR.  
ATTORNEY AT LAW  
803-806 VAN ANTWERP BLDG. May 9th, 1932.  
MOBILE, ALABAMA

Hon. F. W. Hare, Judge,  
Monroeville, Alabama.

Dear Judge Hare:- RE: Camilla Wood vs Raymond Wood.

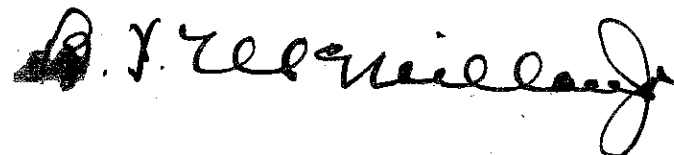
The foregoing matter pending in Baldwin is a suit for divorce and alimony and custody of the children. The depositions have been taken and by agreement with Gordon, Edington and Leigh of this city, Attorneys for respondent, the form of decree has been approved.

I am requesting the Register to send the file, including the evidence to you so that if it meets with your approval the decree can be signed promptly. I am sending the papers through the mail instead of waiting to submit the case the next time you are in Bay Minette for the reason that the plaintiff is about to leave Baldwin County for about two months visit and communicates with me almost daily in order to get this matter disposed of.

I hope you can and will sign and file the decree at as early a date as may be.

Very sincerely your friend,

Mc/M



STATE OF ALABAMA,    |    IN THE CIRCUIT COURT OF SAID COUNTY  
                          \*  
COUNTY OF BALDWIN. |    IN EQUITY        No. \_\_\_\_\_

TO THE HONORABLE F. W. HARE, JUDGE:-

Humbly complaining your oratrix, Camilla Wood, brings this bill of complaint against George Raymond Wood and respectfully shows:

1st.       *Each over the age of twenty one year and both are*  
Complainant and the said George Raymond Wood are bona fide residents of Baldwin County, Alabama, and have been such residents continuously for the past ten years.

2nd.       Complainant and the said George Raymond Wood were married to each other at Fairhope in Baldwin County, Alabama, on to-wit; March 30th, 1924, and they lived together as man and wife until to-wit; during the year 1931, at which time they separated and have not lived together since.

3rd.       Complainant alleges that during their married life the respondent committed actual violence on the person of complainant by striking her. That he has threatened complainant and complainant now charges the respondent with having committed actual violence on her person, attended with danger to life or health or that from his conduct there is reasonable apprehension of such violence and she alleges that she has not condoned the offense.

4th.       Complainant further alleges that there were born of the said marriage two children, viz: George Raymond Wood, a son, who is now seven years of age and Margaret Camilla Wood, a daughter, who is now five years of age. Both of said minors now reside with complainant in Fairhope, Alabama. Both complainant and respondent reside in Fairhope, Alabama, but do not live together or reside on the same premises.

5th.       Complainant further avers that the respondent, George Raymond Wood, is an able-bodied man, capable of making and does make a good salary. Complainant has not sufficient means to support herself and her two children and as the wife and children of the respondent they are entitled to support and maintenance

from him.

PRAYER FOR PROCESS

The premises considered, complainant prays that your Honor will take jurisdiction of the cause made by this bill of complaint and by proper process issued to him from this court the said George Raymond Wood be made a party respondent hereto and be required to answer the charges herein made in all things as required by the rules and practice of this court.

PRAYER FOR RELIEF.

Complainant further prays that your Honor will order a reference to ascertain and determine a reasonable alimony pendente lite and a reasonable sum to be paid her solicitor for prosecution of this cause and will enter a decree requiring the respondent to pay the same. Complainant further prays that your Honor will decree to your petitioner reasonable permanent alimony for the support of herself and children and will enter a decree requiring the respondent to pay such monthly sums to complainant as may be reasonable and proper under all circumstances.

Complainant further prays that upon the hearing of the evidence in said cause your Honor will order, adjudge and decree that the bonds of matrimony heretofore existing between the complainant and the said George Raymond Wood be forever dissolved, that complainant be permitted to contract another marriage should she so desire and will grant to her such other, further and different relief as in equity and good conscience may be due her in the premises.

B. J. McNeill  
SOLICITOR FOR COMPLAINANT

FOOT NOTE:

The respondent, George Raymond Wood, is required to answer each and every allegation and complaint of the foregoing bill of complaint but his oath thereto is hereby expressly waived.

B. J. McNeill  
SOLICITOR FOR COMPLAINANT