

WILLIE B. GREEN,)	
Complainant,)	IN THE CIRCUIT COURT-EQUITY SIDE
-vs-)	STATE OF ALABAMA
ED. J. GREEN,)	BALDWIN COUNTY.
Respondent.)	

TESTIMONY OF J. MANNING GREEN.

My name is J. Manning Green. I am residing at Bay Minette, Alabama, and am over the age of twenty-one years. I am well acquainted with both Willie B. Green and Ed. J. Green, having known them for more than thirty years, and having been in their home from time to time. I was present in their home about, to-wit, October 1st, 1933, when Ed. J. Green struck Willie B. Green with his hand, and his conduct at that time was such as to lead me to believe that his wife's health and possibly her life would be in danger should she continue to reside with him. I think she is justified in quitting him under the circumstances, as he is a man of violent temper, easily aroused, and might possibly do her serious injury in one of these fits of temper.

J. Manning Green

WILLIE B. GREEN,

Complainant,

-vs-

ED. J. GREEN,

Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

TESTIMONY OF WILLIE B. GREEN.

My name is Willie B. Green. I am the Complainant in certain Divorce Proceedings now pending in the Circuit Court of Baldwin County, Alabama, wherein Ed. J. Green is Defendant. I was married to Ed. J. Green on the 8th day of September, 1903, lived with him as his wife until I was compelled to leave him on account of his treatment toward me. On, to-wit, October 1st, 1904, he came into the house in a rage and struck me with his hand. His conduct at that time was such that I believed my life was in danger. He is a man possessed of a strong, ungovernable temper, and on occasions when he is seized with these fits of temper is likely to strike or hit me, and it is impossible to live with him under these conditions.

Willie B. Green

WILLIE B. GREEN,

Complainant,

-vs-

ED. J. GREEN,

Respondent.

)
) IN THE CIRCUIT COURT-EQUITY SIDE
)
) STATE OF ALABAMA
)
) BALDWIN COUNTY.
)

TO THE HONORABLE THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, AND
THE HON. FRANCIS W. HARE, JUDGE THEREOF, SITTING IN EQUITY:-

Comes your Complainant, Willie B. Green, and exhibits
this her Bill of Complaint for Divorce against Ed. J. Green, and
shows:-

FIRST:

That your Complainant and Respondent are both over the
age of twenty-one years, and are bona fide residents of Baldwin
County, Alabama, residing at Bay Minette, Alabama, having been such
residents for more than thirty years.

SECOND:

That your Complainant and the Respondent were married on
heretofore, to-wit, the 8th day of Sept, 1933 and
have lived together as man and wife since said time, and until,
on account of the matters hereinafter complained of, your Com-
plainant was compelled to leave the Respondent and live separate
and apart from him. That on, to-wit, October 1st, 1933, while
your Complainant and Respondent were living together as man and
wife in Baldwin County, Alabama, at Bay Minette, the Respondent
committed actual violence on the person of your Complainant, at-
tended with danger to life or health; that the Defendant struck
your Complainant; that the conduct of Defendant was such that
your Complainant had reason to apprehend the commission of actual
violence on her person, attended with danger to her life or health,
had she continued to reside with him.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, your Complainant prays that the
above named Respondent be made party Defendant to this cause by
the usual process of this Honorable Court, requiring him to appear
and plead, answer or demur, within the time and under the penalties
prescribed by the rules of this Court and the Statutes in such

(page two)

cases made and provided.

That upon a final hearing of this cause there be granted to your Complainant a divorce, and should your Complainant be mistaken in the relief prayed for that there should be granted to her such other, further and different relief to which she may be entitled. And as in duty bound she will ever pray, etc.

Willie B. Green.

FOOT NOTE:-

Respondent is required to answer each and every paragraph of the foregoing Bill of Complaint, from "First" to "Third" both inclusive, but answer under oath is hereby expressly waived.

Gybert, Herd & Chason
Solicitors for Complainant.

RECORDED
604

BILL OF COMPLAINT.

WILLIE B. GREEN,
Complainant,
-vs-
ED. J. GREEN,
Respondent.

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

Filed October 4, 1933
M. A. Stone
Register.

cases were and provided.

(page two)

WILLIE B. GREEN,

Complainant,

-vs-

ED. J. GREEN,

Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

ANSWER OF ED. J. GREEN.

Comes Ed. J. Green in the above entitled cause, and accepts service of process and waives any and all further notices which may be directed to him in this cause, and waives any notice of the taking of testimony, or of any other proceedings to be had in this cause.

Ed. J. Green.

ACCEPTANCE OF SERVICE AND

WAIVER OF NOTICE.

WILLIE B. GREEN,

Complainant,

-vs-

ED. J. GREEN,

Respondent.

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

Filed October 4, 1933

M. A. Stone
Register.

WILLIE B. GREEN,

Complainant,

-vs-

ED. J. GREEN,

Respondent.

IN THE CIRCUIT COURT-EQUITY SIDE

STATE OF ALABAMA

BALDWIN COUNTY.

ANSWER OF ED. J. GREEN.

Comes Ed. J. Green in the above entitled cause, and accepts service of process and waives any and all further notice which may be directed to him in this cause, and waives any notice of the taking of testimony, or of any other proceedings to be had in this cause.

Ed. J. Green.

The State of Alabama }
Baldwin County

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

WILLIE B. GREEN

COMPLAINANT

VS.

ED. J. GREEN

RESPONDENT

I, Anderson Stone

as ~~Register and~~ Commissioner

have called and caused to come before me Willie B. Green and J. Manning Green

witnesses named in the Requirement for Oral Examination, on the 5th day of October

1933, at the office of

in Bay Minette, Alabama, and having first sworn said witness esto speak the

truth, the whole truth, and nothing but the truth, the said Willie B. Green and J.

Manning Green

doth depose and say as follows:

ORAL EXAMINATION

I, Anderson Stone, as ~~Register and~~ Commissioner hereby certify that the foregoing depositions 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 as Commissioner 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 5th day of October 1933.

Anderson Stone (L. S.)

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Mrs. Willie B. Green
COMPLAINANT

vs.

Ed. J. Green
RESPONDENT

ORAL DEPOSITION

Filed Oct. 5, 1933

m. a. Stone, Register

RECORDED IN

Record

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Register

8581 NOTE OF TESTIMONY

.....WILLIE B. GREEN.....

.....Complainant,.....

vs.

.....ED. J. GREEN.....

.....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,.....
Acceptance of Service and Waiver of Notice;.....
Testimony of Willie B. Green and J. Manning Green; Request for.....
Decree in Vacation.....

and in behalf of Defendant upon.....

.....M. A. Stone.....

Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. _____

Term, 192 _____

WILLIE B. GREEN

Complainant...

vs.

ED. J. GREEN

Defendant...

To M. A. STONE, Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, 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, Heard & Chason

Hybart Solicitors 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, Heard & Chason
Solicitor for Complainant.

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Willie B. Green

vs.

Ed. J. Green

REQUEST FOR DECREE IN
VACATION

FILED

Oct, 5

1933

m. a. Stone

Register

RECORDED IN RECORD

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No. 9885

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

Willie B. Green

VS

Ed. J. Green

NOTE OF TESTIMONY

Filed in Open Court this Oct 6

day of Oct 1923

M. A. Stone

Register

The State of Alabama, }
Baldwin County.

No. _____ CIRCUIT COURT, IN EQUITY

WILLIE B. GREEN, _____ Complainant.

vs.

ED. J. GREEN, _____ Defendant.

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of 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 the Complainant is forever divorced from the Defendant.

It is further ordered, that the said Willie B. Green be, and she is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Ed. J. Green pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said Willie B. Green.

It is further ordered, adjudged and decreed that said Willie B. Green shall not again marry except to said Ed. J. Green until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said Ed. J. Green during the pendency of said appeal

This 7th day of October 1933.

J. M. Hare
Judge of the Circuit Court of Baldwin County.

THE STATE OF ALABAMA, }
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY.

I, _____ Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the _____ day of _____ 192____, in the cause of _____ Complainant.

vs.

_____ Defendant.
as appears of record in said Court.

Witness my hand and the seal of said Court, this the _____ day of _____ 192____

Register.

William B. Green
No. 9880

THE STATE OF ALABAMA,
BALDWIN COUNTY.

CIRCUIT COURT, IN EQUITY,
BALDWIN COUNTY, ALA.

E. O. M.
William B. Green
vs.
Ed J. Green

DECREE OF DIVORCE.

Filed in office this

day of _____, 192

Register.

E. O. M.