



STATE OF ALABAMA )

BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon WILLARD JOINER, of Baldwin County, Alabama, to be and appear before the Judge of Circuit Court of Baldwin County, Alabama, 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 CELIA JOINER, against said WILLARD JOINER, and further to do and perform what said Judge shall order and direct in that behalf. And we further command that you return this writ with your endorsement thereof, to our said Court immediately upon the execution thereof.

Witness R. S. Duck, Register of said Court, this the 21st day of January, 1943.

  
Register

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CELIA JOINER,  
Complainant, )

vs )

WILLARD JOINER,  
Respondent, )

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

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

Your, Complainant, Celia Joiner, humbly complaining against the Respondent, Willard Joiner, respectfully represents and shows unto your Honor and this Honorable Court, as follows:

1.

That your Complainant and the Respondent are both over twenty-one years of age and bona fide residents of Baldwin County, Alabama.

2.

That the Complainant and the Respondent married at Bay Minette, in Baldwin County, Alabama, on February 16th, 1942.

3.

That subsequent to their marriage the Respondent committed acts of adultery with a woman by the name of Rabun, and whose

given name is unknown to the Complainant; that said acts of adultery on the part of the Respondent were without the consent and approval of the Complainant, and that she has not condoned said acts.

WHEREFORE, the Complainant prays that your Honor will by proper process make the said Willard Joiner, party 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.

Complainant further prays that upon a final hearing hereof your Honor will give and grant to her a decree of divorce forever barring the bonds of matrimony existing between her and the Respondent; that she may receive such other, further, different or general relief, as she may be in equity and good conscience entitle to receive, and as in duty bound she will ever pray.

BEBBE & HALL

By *W. H. Hall*  
Solicitors for Complainant.

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT

TO Lauda Corwin

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 Celia Joiner and Myrtle Joiner

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

CELIA JOINER Complainant

and

WILLARD JOINER 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 2 day of Dec, 1943

*[Handwritten Signature]*

REGISTER

Commissioner's Fee \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

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CELIA JOINER, COMPLAINANT

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VS.

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WILLARD JOINER, RESPONDENT

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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 defendant and depositions of CELIA JOINER and  
MYRTLE JOINER.

and in behalf of Defendant upon \_\_\_\_\_

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Produce Register.

STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. \_\_\_\_\_ Term, 194\_\_\_\_\_

CELIA JOINER \_\_\_\_\_, Complainant

Vs.

WILLARD JOINER \_\_\_\_\_, Defendant

To R. S. Duck, 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 BEEBE & HALL

\_\_\_\_\_ 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.

Beebe & Hall  
by [Signature]  
Solicitor for Complainant.

Celia Joiner, )  
Complainant, )  
vs )  
Willard Joiner, )  
Respondent. )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ANSWER AND WAIVER OF RESPONDENT.

Comes the respondent, Willard Joiner, in the above entitled cause, and for answer to the bill of complaint filed in said cause against him by Celia Joiner, the complainant, he, the said respondent, denies each and every allegation thereof and demands strict proof of the same.

And respondent hereby waives all notice of the taking of testimony by complainant in said cause and agrees and consents that said cause be submitted by complainant without notice to him, the said respondent.

W. E. Smith  
Solicitor for the respondent, Willard Joiner.

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RECORDED

Filed this 29 Dec 1913  
R. J. [Signature]  
Clerk Register



Received in Sheriff's Office  
this 21 day of Jan; 1943  
W. R. STUART, Sheriff

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Quinty

Executed this the 26<sup>th</sup>  
day of Jan 1943 by  
sending a copy of the  
within Complaint on  
Willard Joiner

W.R. Stuart  
Sheriff  
G.P. Pruitt  
S.S.

CELIA JOINER  
Complainant

VS.

WILLARD JOINER  
Respondent

JAN 21 1943  
Filed this JAN 26 1943  
B. B. Wick  
Clark Register

No. 848

Page \_\_\_\_\_

**The State of Alabama,**  
Baldwin County  
**CIRCUIT COURT, IN EQUITY**

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\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Vs.

**REQUEST FOR DECREE IN  
VACATION**

Filed Feb 3, 1943

[Signature]  
Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

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**RECORDED**

No. 848

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

VS.

NOTE OF TESTIMONY

Filed in Open Court this 2

day of Feb

1943

Register.

RECORDED  
RECEIVED

Celia Joiner,  
Complainant

vs

Willard Joiner  
Complainant

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ANSWER AND WAIVER OF  
RESPONDENT

Filed January 26 1943  
D. L. Luck  
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THE STATE OF ALABAMA  
Baldwin County

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

CELIA JOINER

COMPLAINANT

VS.

WILLARD JOINER

RESPONDENT

I, Lauda Corwin

as Register and Commissioner

have called and caused to come before me

Celia Joiner and Myrtle Joiner

witnesses named in the Requirement for Oral Examination, on the \_\_\_\_\_ day of \_\_\_\_\_

19\_\_\_\_, at the office of \_\_\_\_\_

in Bay Minette, Alabama, and having first sworn said witnesses to speak the truth,

the whole truth, and nothing but the truth, the said Celia Joiner

doth depose and say as follows:

My name is Celia Joiner. I am a bona fide resident of Baldwin County, Alabama and over twenty-one years of age. I have lived in Baldwin County, Alabama all my life. The respondent, Willard Joiner, is over twenty-one years of age and is a bona fide resident of Baldwin County, Alabama.

The respondent and I were married at Bay Minette, Alabama, February 16, 1942. We lived together as husband and wife in Baldwin County, Alabama until in June, 1942. On Friday and Saturday nights before we separated the respondent committed acts of adultery with a girl by the name of Rabun. I do not know her first name. Immediately upon learning of the respondent having committed the said acts of adultery I left him and have not lived with him since that time. The respondent is, at the present time, living with the Rabun girl near Bay Minette in Baldwin County, Alabama, and he has lived with her since I left him. The said acts of adultery were without my consent or approval and I have not condoned them.

Celia Joiner

Myrtle Joiner, a witness for the Complainant, being first duly sworn, deposes and says as follows:

My name is Myrtle Joiner. I am a resident of Baldwin County, Alabama. I am acquainted with both the complainant and the respondent, Celia Joiner and Willard Joiner.

I have talked with Willard Joiner on separate occasions and during the conversation he told me that he was living with the Rabun girl. They are now living near Bay Minette to the South, near the old Bryant Saw Mill.

I know of my own personal knowledge that Celia Joiner has not lived with Willard as his wife since sometime in June, 1942 when it was first reported that Willard was living with the Rabun girl.

Myrtle Joiner

ORAL EXAMINATION

I, Lauda Corwin, as Register and Commissioner hereby certify that the foregoing deposition ~~s~~ 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 Lauda Corwin, H. M. Hall, attorney for Complainant 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 \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

Lauda Corwin (L. S.)

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**THE STATE OF ALABAMA**  
**Baldwin County**

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**IN CIRCUIT COURT, IN EQUITY**

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Complainant \_\_\_\_\_

Vs. \_\_\_\_\_

Respondent \_\_\_\_\_

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**ORAL DEPOSITION**

Filed Feb 5, 1945, Register \_\_\_\_\_

RECORDED IN \_\_\_\_\_

Record \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register \_\_\_\_\_

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CELIA JOINER, COMPLAINANT  
VS.  
WILLARD JOINER, RESPONDENT

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

This cause coming on to be heard was submitted upon bill of complaint, answer and waiver of the respondent, and testimony as noted by the register and upon consent 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 respondent be, and the same are hereby, dissolved, and that the said CELIA JOINER is forever divorced from the said WILLARD JOINER.

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 an 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 said complainant and the respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further order that the complainant pay the costs herein for which execution may issue.

Done at Bay Minette, Alabama in Baldwin County on this the 2nd day of February, 1943.

F. W. HARE  
Judge of the 21st Judicial Circuit

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that the above and foregoing instrument is a true and correct copy of the Decree rendered by the Judge of the Circuit Court in the above styled cause and same is on file and recorded in my office.

Witness my hand and seal this 4th day of November, 1950.

Register, Circuit Court.