

RECORDED

No. 929 Page _____

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

Elnore Parker

Vs.

Kellis Parker

**REQUEST FOR DECREE IN
VACATION**

Filed APR 23 1940, 194

R. S. DUCK

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA }
Baldwin County

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

Elnora Parker COMPLAINANT

VS.

Kellis Parker RESPONDENT

I, Virginia Keel

~~as Register and~~ Commissioner

have called and caused to come before me Elnora Parker and

Annie Bell Stewart

witnesses named in the Requirement for Oral Examination, on the 23rd day of April

1943, at the office of Boebe & Hall

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

the whole truth, and nothing but the truth, the said Elnora Parker

doth depose and say as follows:

My name is Elnora Parker. I live at Bay Minette, Baldwin County, Alabama and I am over twenty-one years of age.

The Respondent, Kellis Parker is over twenty-one years of age and a resident of Baldwin County, Alabama.

The Respondent and I were married at Leaksville, Mississippi on June 12, 1929. We lived together as husband and wife in Baldwin County, Alabama until March 26, 1943.

The Respondent on March 26, 1943 and at various other times threatened, cursed and abused me and often times threatened to commit actual violence to my person. The conduct of the Respondent was such as to give me every reasonable apprehension to believe and I did actually believe that if I continued to live with him he would carry out his threats and do violence to my person would necessarily endanger my life and health. The Respondent is a man who drinks to excess and has a vile and ungovernable temper.

We have no children and no property.

Elnora Parker

Annie Bell Stewart, a witness for the Complainant being first duly sworn, deposes and says:

My name is Annie Bell Stewart. I live in Bay Minette in Baldwin County, Alabama. I am personally acquainted with Elnora Parker and Kellis Parker. I have been around them quite a bit while they lived together as husband and wife and especially during the past year. The Respondent is a man who drinks to excess and who has a vile and ungovernable temper. I know that he has oftentimes threatened and abused the Complainant and threatened to do violence to her person which would necessarily endanger her life and health. I know of my own personal knowledge that the conduct of the Respondent is such as to render it absolutely impossible for the Complainant to live with him.

Annie Bell Stewart

ORAL EXAMINATION

I, Virginia Keel, 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 witness ~~s~~ and read over to them and they signed the same in the presence of myself and Hubert M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness~~s~~ or had proof made before me of the identity of said witness~~s~~; 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 23 day of April, 1943.

Virginia Keel (L. S.)

No. 929 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Elmore Parker Complainant
 Vs.
Kellis Parker Respondent

ORAL DEPOSITION

Filed APR 23 1943, 19____
R. S. DUCK, Register
 RECORDED IN _____
 Record _____

Vol. _____ Page _____
 Register _____

 Elnora Parker

 VS.

 Kellis Parker

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 Respondent

Testimony of Elnora Parker and Annie Bell Stewart

and in behalf of Defendant upon _____

R. J. ...

Register.

Moore Printing Co.
Register.

day of _____ R. S. DUKK

Filed in Open Court this APR 23 1943

NOTE OF TESTIMONY

Kellis Parker

VS.

Elmore Parker

CIRCUIT COURT OF BALDWIN COUNTY

IN EQUITY

The State of Alabama,
BALDWIN COUNTY

No. 939

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 194_____

Winore Parker _____, Complainant

Vs.

Kellis Parker _____, 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 Reebe & 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 vaca-