

2378

8531. NOTE OF TESTIMONY

1M-7-46

Printed By The Baldwin Times

GUSSIE McREYNOLDS

VS.

ALLEN McREYNOLDS

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

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

ORAL deposition and note of testimony,

and in behalf of Defendant upon answer and waiver

*C. L. Ginn Thompson*  
Atty -

*Alfred J. Newcomb*  
Register.

No. ....

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

GUSSIE MOREYNOLDS

VS.

ALLEN MOREYNOLDS

NOTE OF TESTIMONY

Filed in Open Court this .....

day of ....., 194

FILED

OCT

26

1949 Register.

ALICE J. HUBB, Twp. Baldwin Times  
Printer

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Peggy Guy

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 Gussie McReynolds and Lucile Graves

as witnesses in behalf of Gussie McReynolds in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Gussie McReynolds and Lucile Graves

, Complainant  
and Allen McReynolds

Respondent  
on oath, to be by you administered, upon Gussie McReynolds  
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 24th day of October, 194 9

Amos J. Wicks  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

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

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

**CIRCUIT COURT**

**GUSSIE MOREYNOLDS**

Complainant

**vs.**

**ALLEN MOREYNOLDS**

Defendant

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

**PEGGY GUY**

**WITNESSES:**

**GUSSIE MOREYNOLDS**

**LUCILE GRAVES**

GUSSIE McREYNOLDS

¶

IN THE CIRCUIT COURT OF

COMPLAINANT

¶

BALDWIN COUNTY, ALABAMA

VS.

¶

IN EQUITY

ALLEN McREYNOLDS

¶

RESPONDENT

¶

Now comes the Respondent, acting by and through his Solicitor of record and accepts service of summons and complaint in this cause.

1.

The Respondent admits the allegations as to ages, residences, and marriage, but denies all allegations as to cruelty and demands strict proof of the same.

*Samuel*  
Solicitor for the Respondent

RECORDED

FILED

OCT 25 1949

ALICE J. DUCK, Register

THE STATE OF ALABAMA  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Gussie McReynolds

Complainant

VS.

Allen McReynolds

Respondent

I, Paggy Guy

as Register and Commissioner in the above cause

have called and caused to come before me Gussie McReynolds and Lucile Graves

witness es named in the Requirement for Oral Examination, on the 24 day of October  
1949, at the office of C. LeNoir Thompson

in Bay Minette, Alabama, and having first sworn said Witnesses to speak the  
truth, the whole truth, and nothing but the truth, the said Gussie McReynolds and  
Lucile Graves doth depose and say as follows:

That my name is Gussie McReynolds and I am over the age of  
twenty-one years and a citizen of Baldwin County and have been for  
more than two years next preceding the Respondent is over the age  
of twenty-one and a citizen of Baldwin County, Alabama and has  
been more than two years next preceding.

We were married on January 16th, 1939 in Bay Minette,  
Alabama and lived together ~~until~~ until September 15th, 1949. The  
cause of our separation was cruelty as my husband, Allen McReynolds,  
mistreated me striking me about the head with a weapon and on the  
body and tried to use a knife on me, placing me in fear of my life  
or health. ~~xxxxx~~ I do not know of any cause that I gave him for such  
treatment he had mistreated me on other occasions but this was the  
last time he misused me, though he has ~~x~~threatened me since. We  
have no children as fruits of our marriage and there is no property  
to be divided. I would like to have my name back.

No cross-examination by H. M. Hall, as attorney for Allen  
McReynolds.

Gussie McReynolds

My name is Lucille Graves. I am over the age of twenty-one  
years and a resident of Baldwin County, Alabama. I have known  
Alan and Gussie McReynolds about seven years. They have no children.  
The cause of their separation so far as I know was that Alan beat up  
Gussie, splitting her scalp and bruising her considerably. Because  
of this she left him. I do not know any reason why he did this, as  
I do not think she gave him cause for mistreating her. This happened  
about September 15th, 1949.

No cross-examination by H. M. Hall, as attorney for Allen  
McReynolds.

Lucile Graves

ORAL EXAMINATION.

I, Peggy Guy, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and C. LeNoir Thompson

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom 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 24th day of October, 194 9

Peggy Guy (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

GUSSIE McREYNOLDS

vs. Complainant

ALLEN McREYNOLDS

Respondent.

Oral Deposition

Filed \_\_\_\_\_, 194 \_\_\_\_\_

\_\_\_\_\_, Register.

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

\_\_\_\_\_, Record

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

\_\_\_\_\_, Register.

FILED

Recorded in  
25 1949

ALICE J. DUCK, Register



GUSSIE MCREYNOLDS

Complainant

VS

ALLEN MCREYNOLDS

Respondent

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

TO THE HONORABLE TELFAIR J. MASHBURN JR., JUDGE OF THE TWENTY-  
EIGHTH JUDICIAL CIRCUIT, BAY MINETTE, BALDWIN COUNTY, ALABAMA, IN  
EQUITY SITTING:

Comes the Complainant, Gussie McReynolds, who shows unto your  
Honor the following state of facts:


1. That your Complainant, Gussie McReynolds, is over the age of  
Twenty-one years and Respondent, Allen McReynolds, is over the age of  
Twenty-one years and both are bona-fide residents of Baldwin County,  
Alabama and have been for more than five years next preceding.
2. That your Complainant and Respondent married in Baldwin County,  
Alabama on January 16th, 1939 and lived together as husband and wife  
until September 15th, 1949.
3. That Respondent has repeatedly threatened your Complainant  
and mistreated her, particularly on to-wit; September 15th, 1949, at  
which time he struck her about the head and on the body with a weapon,  
placing her in fear of her life and health and causing her to believe  
that her life was in danger and she did so believe.
4. There are no children as fruits of our marriage.

#### PRAYER

WHEREFORE, THE PREMISES CONSIDERED, your Complainant prays that  
your Honor will by proper process, make the said Allen McReynolds, party  
Respondent to this cause of action in order that Complainant may have the  
relief hereinafter prayed for, 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.

That on final hearing of this cause that your Honor will grant unto  
her an absolute divorce, forever dissolving the bonds of matrimony existing  
between your Complainant and the Respondent and at the time of rendering this  
decree your Honor will grant unto your Complainant the right to use her former

name of Gussie Norman. Should your Complainant be mistaken in the relief prayed for, that there be granted unto her such other, different and general relief to which she may be entitled and as in duty bound she will ever pray.

  
Solicitor for Complainant

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BY HENDERSON  
AT THE OFFICE OF C. L. THOMPSON

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no 2378

GUSSIE MOREYNOLDS

VS

ALLEN MOREYNOLDS

COMPLAINT

PETITION FOR DIVORCE

RECORDED

LAW OFFICE OF C. LENOIR THOMPSON  
BAY MINETTE, ALABAMA

FILED

OCT 25 1949

ALICE J. DUCK, Register

RECORDED FOR RECORD

1949 10 25

## The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

GUSSIE McREYNOLDS

, Complainant

vs.

ALLEN McREYNOLDS

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on answer and waiver 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 GUSSIE McREYNOLDS is forever divorced from the said ALLEN McREYNOLDS for and on account of cruelty

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 the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that GUSSIE McREYNOLDS

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

This 26<sup>th</sup> day of October, 1949...

Telfair J. Madabeary, Jr.  
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.

2378

No. 2378 Page \_\_\_\_\_

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED  
OCT 27 1949  
ALICE A. DUCK, Registrar