The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

| | | Complainant |
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| | V S | • |
| EARL DEWEY KIM | ž | Respondent |
| This course coming on to be board was subm | sitted upon Pill | - |
| This cause coming on to be heard was subm | | \overline{y} |
| on <u>Answer and waiver</u> onsideration thereof, the Court is of the opinion | —and Testimon; that the Combi | y as noted by the Register; and upor lainant is entitled to the relief prayed |
| or in said bill. | | |
| It is therefore ordered, adjudged and decreed | d by the Court | that the bonds of matrimony here |
| ofore existing between the Complainant and | Defendant be, | and the same are hereby, disolved |
| nd that the said BEATRICE KING s forever divorced from the said | | |
| EARL DEWEY KING | | |
| MAALI DEWEST ALING | | |
| or and on account of Cruelty | | |
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| It is further ordered, adjudged and decreed except to each other until sixty days after the | rendition of th | is decree, and that if appeal is take |
| except to each other until sixty days after the within sixty days, neither party shall again manappeal. It is further ordered that Beatrice King e, and they arhereby permitted to again comis suit. | rendition of the rry except to ear | is decree, and that if appeal is taken ich other during the pendency of said wey King |
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| Circuit Court, BEATRICE LING WS. CO DIVORCE D DIVORCE D DUANG DATE DATE | | Page. |
| In Equity complainant. Respondent ECREE | labama mty | NON I |

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| BEATRICE | KING COMPLAINANT |) |) IN | THE | CIRCUIT | COURT | OF |
|-----------|-----------------------|----------|--------------|-------|----------|--------|-----|
| VS | | į | BAI | LDWIN | COUNTY, | , ALAB | AMA |
| • | | , | ;) | | IN EQUIT | Y. | |
| EARL DEWE | Y KING RESPONDENT. | \ | ! }• ! | | | | |

And now comes the Respondent, Earl Dewey King, in his own proper person, and for answer to the complainant's Bill of Complaint, and each allegation contained therein, says:

That he denies the same, and demands strict proof thereof.

The Respondent waives notice of the time of taking testimony, on behalf of the Complainant, the right to cross-examine the Complainant's witnesses, and agrees that this cause be submitted forthwith without further notice.

The Respondent accepts service of summons and Complaint in this cause.

Fail Dewy Trag

WI TNESS:

STATE OF ALABAMA BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU THAT you summon Earl Dewey King to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a Bill of Complaint, lately exhibited by Beatrice King against the said Earl Dewey King, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your execution thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this day of June, 1943.

Register.

BEATRICK KING COMPLAINANT

VS

EARL DEWEY KING RESPONDENT IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA
IN EQUITY.

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

Now comes your Complainant, Beatrice King, and humbly complaining against the Respondent, Earl Dewey King, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent were married at Bay Minette, Alabama, on June 3rd, 1919, and lived together as husband and wife until March 3rd, 1943.

3 ,

Tjat on, to-wit, March 3rd, 1943, and at various other times prior thereto, the Respondent cursed, threatened and abused the Complainant, and often threatened to do actual violence to her person, which would necessarily

endanger her life and health, that the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe, and she did actually believe, that if she continued to live with him he would carry out his threats and do violence to her person which would necessarily endanger her life and health.

PRAYER FOR PROCESS.

Wherefore, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Earl Dewey King 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 unto her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent, and that your Honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive and as in duty bound she will ever pray.

BEEBE & HALL

By Solicitors for Complainant.

ROBE 955

BEATRICE KING, COMPLAINANT

VS

EARL DEWEY KING RESPONDENT.

SUMMONS AND COMPLAINT.

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BEATRICE KING,

COMPLAINANT

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EARL DEWEY KING, RESPONDENT

ANSWER AND WAIVER.

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Clerk Register

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THE STATE OF ALABAMA **Baldwin County**

BEATRICE KING

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

| | BEATRICE KING | COMPLAINANT |
|-------------------------|--|--|
| | VS. | • |
| | EARL DEWEY KING | RESPONDENT |
| I, | Bernice F. Reid | |
| - | and Commissioner | · |
| have called | and caused to come before meBeatrice Ki | ng, and Linnie McDonald |
| | | |
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| | | |
| witness ^{es} n | amed in the Requirement for Oral Examination | on, on the 5 day of June |
| 19 <u>43</u> , at | the office of BEEBE & HALL | · |
| in Bay Mir | nette, Alabama, and having first s | sworn said witness esto speak the truth, |
| the whole to | ruth, and nothing but the truth, the saidBea | trice King, and Linnie McDonald |
| | doth depose and | |
| _ | My name is Beatrice King. I am | the Complainant in the above |
| cause. I | am a resident of Baldwin County, Alab | ama, and over twenty one years of |

a resident of Baldwin County, Alabama.

The Respondent and I were married on June 3rd, 1919. lived together as husband and wife until on, to-wit, March 3rd, 1943. On March 1st, 1943, and at various other times, the Respondent cursed, threatened and abused me, and often threatened to do actual violence to my person, which would necessarily endanger my life and health.

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 which would necessarily endanger my life and health.

The Respondent and I have been having trouble for a number of years, and conditions finally got to the point where it is now absolutely impossible for us to live together as husband and wife.

Beatrice King

LINNIE McDONALD

Linnie McDonald, a witness for the Complaint, being first duly sworn, deposes and says: My name is Linnie McDonald. I live at Bay Minette, in Baldwin County, Alabama. I am personally acquainted with the Complainant and the Respondent in this cause. I have known them for a number of years and have had occasion to be with and around them quite ofte n. I have noticed for the past years the conditions existing in the home of the Complainant and the Respondent, and know of my own personal knowledge that they are such that the Complainant and the Respondent can no longer, in peace, live together as husband and wife. The conduct of the Respondent is such, toward the Complainant, as to render it absolutely impossible for them to live together as husband and wife.

| | I, Bern | ice F | Reid | | | , as | Regis | ter and Comr | nissioner h | ereby certify |
|---------------|------------------------------------|-----------------------------|--|-------------|-----------------|----------------|------------|-----------------|----------------------|-----------------|
| tl | at the forego | ing dep | ositions | on Oral | Exami | nation | was t | aken down in | writing h | y me in the |
| w | ords of the wi | tnesses | and read | l over to_ | them | _ and _ | the | y signed t | he same in | the presence |
| of | f myself — | | an | d of H. | M. Hal | <u> </u> | | | | |
| a | t the time and | place l | nerein me | entioned; | that I h | ave pe | rsonal | knowledge | of persona | l identity of |
| Sã | aid witness es | or had | proof ma | ide before | e me of | the ide | entity | of said witne | ess <u>es</u> , that | I am not of |
| C | ounsel or of k | in to a | ny of the | parties t | o said c | ause, o | r any n | nanner interes | ted in the 1 | result thereof. |
| | I enclose th | ne said | Oral Exa | mination | in an e | nvelop | e to the | e Register of s | aid Court. | |
| | Given unde | er my h | and and s | seal, this_ | 5 | day | 7 of — | June | | , 19 <u>43</u> |
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| | STATE OF ALABAMA Baldwin County | IN CIRCUIT COURT, IN EQUITY | | Complainant | | Responde | z | , 194 | ř I | . Registe |
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| State of Alabama, Baldwin County. | }NO | <u> </u> | TERM, 194 <mark>3</mark> |
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| BEATRICE KING | | <u>-</u> | |
| | .Complainant | | |
| VS. | | | |
| FARL DEWEY KING | Respondent—. | • | : • |
| TO R. S. DUCK, REGISTE | 3: | • | |
| In the above stated car | ise a n answer and i | wai ver | |
| having beenfiled by | | | the Respondent, |
| and evidence having been | taken, and the cause | being ready for submission | n for final decree, and |
| no defense having been in Solicitor— of record, now f papers in this cause to the J | iles with the Register | of this Court this written | request to deliver the |
| | | Solicitor_s | for Complaintant |

| BEATRICE KING |
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| COMPLAINANT |
| Complainant |
| VS. |
| EARL DEWEY KING |
| Respondent—. |
| Request For Decree In Vacation |
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| $\mathbf{Register}$ |

Clerk Register.

| BEATRICE KING, | |
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| COMPLAI NANT | THE STATE OF ALABAMA, BALDWIN COUNTY |
| VS. | |
| | IN EQUITY |
| EARL DEWEY KING Respondent | CIRCUIT COURT OF BALDWIN COUNTY |
| | |
| Answer and waiver of Respondent, and | inant upon the original Bill of Complaint, d testimony of Complainant's witnesses |
| | · |
| and in behalf of Defendant upon | |
| | |
| | Register. |



No.

The State of Alabama, BALDWIN COUNTY IN EQUITY CIRCUIT COURT OF BALDWIN COUNTY BEATRI CE KING COMPLAINANT VS. EARL DEWEY KING RESPONDENT NOTE OF TESTIMONY Filed in Open Court this 5 day of-Register.

Moore Printing Co.



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Clark Register