

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BEATRICE KING Complainant

VS

EARL DEWEY KING Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decress 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 BEATRICE KING is forever divorced from the said

EARL DEWEY KING

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 Beatrice King and Earl Dewey King be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Earl Dewey King the Respondent pay the cost herein to be taxed, for which execution may issue.

This 7th day of June, 19 43.

J. W. Hase 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.

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
5 day of June, 1943.

R. S. Duck

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.

RECORDED
953

BEATRICE KING,
COMPLAINANT

VS

EARL DENNEY KING
RESPONDENT.

SUMMONS AND COMPLAINT.

FILED
JAMES H. HILL
Mark Register

953

RECORDED

BEATRICE KING,
COMPLAINANT

VS

EARL DEWEY KING,
RESPONDENT

ANSWER AND WAIVER.

Filed *Jan 5 1943*
J. M. Beck
Clerk Register

Filed
Clerk Register

THE STATE OF ALABAMA }
Baldwin County

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

BEATRICE KING

COMPLAINANT

VS.

EARL DEWEY KING

RESPONDENT

I, Bernice F. Reid

as Register and Commissioner

have called and caused to come before me Beatrice King, and Linnie McDonald

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

19 43, at the office of BEEBE & HALL

in Bay Minette, Alabama, and having first sworn said witness^{es} to speak the truth,

the whole truth, and nothing but the truth, the said Beatrice King, and Linnie McDonald

doth depose and say as follows:

My name is Beatrice King. I am the Complainant in the above cause. I am a resident of Baldwin County, Alabama, and over twenty one years of age. The Respondent, Earl Dewey King is over twenty one years of age, and a resident of Baldwin County, Alabama.

The Respondent and I were married on June 3rd, 1919. We 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 often. 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.

Linnie McDonald

ORAL EXAMINATION

I, Bernice F. Reid, 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 witnesses and read over to them and they signed the same in the presence of myself and of H. M. Hall 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 5 day of June, 1943.

Bernice F Reid (L. S.)

No. 957 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

BEATRICE KING

Complainant

Vs.

EARL DEWEY KING

Respondent

ORAL DEPOSITION

Filed June 1943 Register

RECORDED IN _____

Record _____

Vol. _____ Page _____

Register _____

Filed
Clerk Register

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194³_____

BEATRICE KING

Complainant—

VS.

EARL DEWEY KING

Respondent—

TO R. S. DUCK, REGISTER:

In the above stated cause a ~~n answer and waiver~~ _____
having been filed by _____ the Respondent—,
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 _____,
Solicitor— 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.

Solicitor—s for Complainant—

RECORDED

BEATRICE KING

COMPLAINANT

Complainant—

VS.

EARL DEWEY KING

Respondent—

Request For Decree In Vacation

Filed

June, 194*7*

R. R. [Signature]
Register.

Filed
Clerk Register

BEATRICE KING,

COMPLAINANT

VS.

EARL DEWEY KING

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, _____
Answer and waiver of Respondent, and testimony of Complainant's witnesses

and in behalf of Defendant upon _____

Robert Register.

RECORDED

No. _____

The State of Alabama,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

BEATRICE KING

COMPLAINANT

VS.

EARL DEWEY KING

RESPONDENT

NOTE OF TESTIMONY

Filed in Open Court this 5th

day of Aug 1942

[Handwritten Signature]

Register.

953

Filed _____
Clark Register