

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BESSIE PEARL PETTIS, Complainant

vs.

ZYOL E. PETTIS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~XXXXXXXXXXXX~~ 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 Bessie Pearl Pettis is forever divorced from the said Zyol E. Pettis for and on account of cruelty

It is further ordered, adjudged and decreed by the Court that the Complainant, Bessie Pearl Pettis, shall be awarded the care, custody and control of the minor child, Mary Ellen Pettis.

It is further ordered, adjudged and decreed by the Court that the Respondent, Zyol E. Pettis, shall pay to the Complainant the sum of Ten (\$10.00) Dollars each week for the support of the minor child, Mary Ellen Pettis.

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 Zyol E. Pettis the Respondent pay the cost herein to be taxed, for which execution may issue.

This 14th day of March, 1950..

Jelfair J. Mashburn Jr.  
Judge Circuit Court, In Equity.

I, Alice J. Duck 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 14th day of March, 1950..

Register of Circuit Court, In Equity.

No.	Page
1	1
2	2
3	3
4	4
5	5
6	6
7	7
8	8
9	9
10	10
11	11
12	12
13	13
14	14
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The State of Alabama  
BALDWIN COUNTY

## In Circuit Court, In Equity

Complainant

vs.

Respondent

## DIVORCE DECREE

*Handwritten signature*

BESSIE PEARL PETTIS

Complainant

vs

ZYOL E. PETTIS

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Now comes the Respondent and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages and marriage and residence, but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

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

Zyol E. Pettis

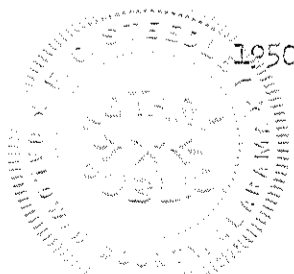
STATE OF ALABAMA  
BALDWIN COUNTY

I, EC Shepherd, a Notary Public, in and for said County, in said State, hereby certify that Zyol E. Pettis, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 6 day of February, 1950.

EC Shepherd  
Notary Public

State of Alabama  
at Hugo



RECORDED

BESSIE PEARL PETTIS

Complainant

vs

ZYOL E. PETTIS

Respondent

ANSWER AND WAIVER

FILED

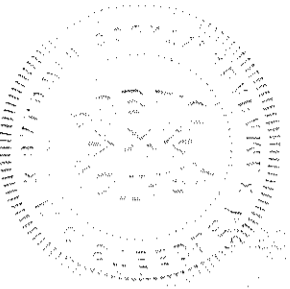
FEB

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1950

ALICE L. DICK, Registrar

From the law office of  
C. LeNoir Thompson  
Bay Minette, Alabama



**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Bessie Pearl Pettis

Complainant

VS.

Lyol E. Pettis

Respondent

I, Peggy Guy

as Register and Commissioner in the above styled cause  
have called and caused to come before me Bessie Pearl Pettis and Mary Ellen Pettis

witnesses named in the Requirement for Oral Examination, on the 18th day of February  
19X 50, at the office of C. LeMoir 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 Bessie Pearl Pettis and Mary  
Ellen Pettis doth depose and say as follows:

That my name is Bessie Pearl Pettis and that I am over the age of twenty-one and a resident of Alabama and the Respondent in this cause is over the age twenty-one and is a resident of Alabama and we both have been such residents more than two years next preceding.

That we were married in Brewton on June 8, 1947 and lived together as husband and wife until about the 4th day of October, 1949 at which time we separated. The separation was caused by the Respondent mistreating me, striking me and twisting my arm and bending my thumb and fingers, so that I was afraid for my life and health. We have not lived together as husband and wife since that time.

There are two children as fruits of our earlier marriage being Thomas Howard Pettis, age 18, and Mary Ellen Pettis, age 15. As long as Mary Ellen Pettis wishes to reside with me, I feel that I should have \$10.00 weekly for her maintenance and my husband has been giving me \$10.00 weekly for that purpose.

Bessie Pearl Pettis

That my name is Mary Ellen Pettis, that I know that they were married the last time and that they are my Mother and Father. That I was present, when he grabbed my Mother and bent her arm back, as though he was trying to twist her arm and bend her fingers and I thought he was going to hurt her seriously; before we could get him to stop. That when he was drinking he was dangerous. I know she has not lived with him as his wife, since that time and I do not feel that it will be safe for her to live with him any more, because he treats her so mean at times.

Mary Ellen Pettis

ORAL EXAMINATION.

I, Bessie Pearl Pettis, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down by me in writing in the words of the witness as and read over to them and they signed the same in the presence of myself \_\_\_\_\_

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness as or had proom made before me of the identity of said witness as; 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 6th day of February, 1945 (L. S.) Hoggy Shum

NO. 2432 PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

\_\_\_\_\_

Bessie Pearl Pettis  
vs. Complainant

\_\_\_\_\_

Zyol E. Pettis  
Respondent.

\_\_\_\_\_

Oral Deposition

\_\_\_\_\_

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

Recorded in \_\_\_\_\_, Register.

FILED \_\_\_\_\_ Record

Vol. FEB 23 1950 Page \_\_\_\_\_

ALICE J. DUCK, Register.

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 \_\_\_\_\_

Bessie Pearl Pettis and Mary Ellen Pettis

as witnesses in behalf of Bessie Pearl Pettis in a cause pending in our Circuit Court in Baldwin County, of said State, wherein \_\_\_\_\_

Bessie Pearl Pettis, Complainant

and \_\_\_\_\_

Zyol E. Pettis Respondent

on oath, to be by you administered, upon Peggy Guy to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 38th day of February, 1945

Register.

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

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

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

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

**CIRCUIT COURT**

Rossie Pearl Pettis

**Complainant**

**vs.**

Zyol E. Pettis

**Defendant**

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

Peggy Guy

**WITNESSES:**

Bessie Pearl Pettis

vs.

Zyol E. Pettis

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, \_\_\_\_\_  
and Oral Deposition

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

*C. L. Simpson*

*W. J. Drake*

Register.

RECORDED

No. 2433

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

BESSIE PEARL PETTIS

vs.

ZYOL E. PETTIS

NOTE OF TESTIMONY

Filed in Open Court this 23rd  
day of February, 1945.

Register.

Printed By The Baldwin Times

STATE OF ALABAMA  
BALDWIN COUNTY

You are hereby commanded to summon ZYOL E. PETTIS, to appear and plead, answer or demur, within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by BESSIE PEARL PETTIS, as Complainant, and against ZYOL E. PETTIS, as Respondent.

WITNESS my hand this 13<sup>th</sup> day of February, 1950.

Reigel Luck  
Register

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BESSIE PEARL PETTIS	§	
Complainant	§	IN THE CIRCUIT COURT OF
VS	§	BALDWIN COUNTY, ALABAMA
ZYOL E. PETTIS	§.	IN EQUITY
Respondent	§	

TO HONORABLE TELFAIR J. MASBURN JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Your Complainant, BESSIE PEARL PETTIS, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent married in Escambia County, Alabama on June 8, 1947 and lived together as husband and wife in Baldwin County, Alabama until on to-wit, October 4, 1949, when for the reason hereinafter set out your Complainant was forced to abandon living with the Respondent.

3.

Your Complainant avers and charges that the said Respondent did on or about the 4th day of October, 1949, and many times ~~subsequent~~ Prior thereto assault, beat, hit and strike Complainant; that said Respondent has committed actual violence on her person attended with danger to her health or life; Complainant avers and charges that Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

4.

That as fruits of this marriage there are two children, THOMAS HOWARD PETTIS, age eighteen, and MARY ELLEN PETTIS, age fifteen. MARY ELLEN PETTIS is at present residing with your Complainant.

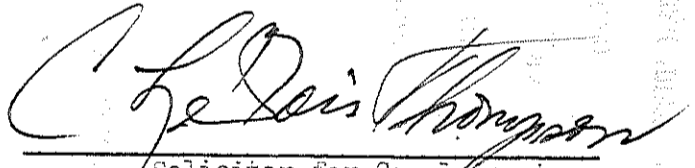
5.

That while MARY ELLEN PETTIS continues to reside with your Complainant that the sum of Ten (\$10.00) Dollars each week be paid to your Complainant by the Respondent, as maintenance for said MARY ELLEN PETTIS.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said EYOL E. PETTIS 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.

Your Complainant further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between your Complainant and Respondent.

That upon a final hearing of this cause, that your Complainant be awarded such other, further, different or general relief as he may be in equity and good conscience entitled to receive.

  
Solicitor for Complainant

2433

RECORDED

BESSIE PEARL PETTIS

Complainant

vs

ZYOL E. PETTIS

Respondent

SUMMONS AND COMPLAINT

FILED

FEB 23 1950

ALICE J. DUCK, Registrar

From the office of  
C. Lenoir Thompson  
Bay Minette, Alabama

2133