

**THE STATE OF ALABAMA  
Baldwin County**

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

JOHN LOUIS WOODYARD, JR. COMPLAINANT

VS.

ELLEN WOODYARD RESPONDENT

I, Virginia Keal

~~as Register and~~ Commissioner

have called and caused to come before me John Louis Woodyard, Jr.

and Lola Lawrence

witnesses named in the Requirement for Oral Examination, on the \_\_\_\_\_ day of \_\_\_\_\_

19\_\_\_\_, at the office of Beebe & 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 John Louis Woodyard, Jr.

doth depose and say as follows:

My name is John Louis Woodward Jr. I am a bona fide resident of the State of Alabama, Baldwin County, over twenty years of age. The Respondent, Ellen Woodyard is also a resident of Baldwin County, Alabama, twenty years of age.

The Respondent and I were married in Pensacola, Florida, on January 30th, 1943. We lived together as husband and wife in Baldwin County, Alabama, until May 31st, 1943.

On May 31st, 1943, the Respondent committed the act of adultery with one Feola Williams; that said act was without my consent or approval, and I have not condoned said act. Immediately upon learning said acts committed by the Respondent, Ellen Woodyard, with Feola Williams, I talked with her. She left me and is now living in Mobile with another man, where she has been since June 5th. This man's name is Mack Dunkin. They are living together as husband and wife. When she is in Foley, in Baldwin County, Alabama, she runs around and lives with Feola Williams. The acts on the part of the Respondent are against my wishes and she refuses to quit. I can not live with her since she has committed the acts of adultery as above stated.

*John Louis Woodward*

Lola Lawrence, a witness for Complainant, being duly sworn, deposes and says: My name is Lola Lawrence. I live at Foley, in Baldwin County, Alabama. I am personally acquainted with John Louis Woodyard and Ellen Woodyard. I remember when they married in Pensacola, Florida. They returned immediately to Foley, in Baldwin County, Alabama. I know that soon after their marriage the Respondent began running around with Feola Williams and committing acts of adultery with him. She has since her marriage to Complainant, John Louis Woodyard, committed acts of adultery with Feola Williams and one Mack Dunkin. She is now living with Dunkin as his wife.

*Lola Lawrence*

ORAL EXAMINATION

I, Virginia Keel, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition ~~s~~ on Oral Examination was taken down in writing by me in the words of the witness ~~es~~ and read over to them and they signed the same in the presence of myself 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 \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_.

Virginia Keel (L. S.)

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

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

**IN CIRCUIT COURT, IN EQUITY**

John Louis Woodyard, Jr.  
Complainant

Vs.

Ellen Woodyard  
Respondent

**ORAL DEPOSITION**

Filed 7-27, 1943

R. S. Alcock, Register  
RECORDED IN

Record \_\_\_\_\_

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

Register \_\_\_\_\_



958

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

John Louis Woodyard, Jr. Complainant

VS

Ellen Woodyard Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decress Pro Confesso on \_\_\_\_\_ 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 John Louis Woodyard, Jr. is forever divorced from the said

Ellen Woodyard

for and on account of

Adultery

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 John Louis Woodyard, and Ellen Woodyard, be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that John Louis Woodyard, the Complainant, pay the cost herein to be taxed, for which execution may issue.

This 29th day of July

1943

J. W. Hare 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.

No. .... Page .....

**The State Of Alabama**

Baldwin County

In Circuit Court, In Equity

.....  
John Louis Woodyard, Jr.  
vs. Complainant.

.....  
Ellen Woodyard

.....  
Respondent.

.....  
**DIVORCE DECREE**

STATE OF ALABAMA

BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, that you summon ELLEN WOODYARD 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 JOHN LOUIS WOODWARD, JR., against the said Ellen Woodyard, 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 endorsement thereon, to our said Court immediately upon the execution thereof.

9<sup>th</sup> WITNESS, R. S. DUCK, Register of said Circuit Court, this day of June, 1943.

R. S. Duck  
Register.

JOHN LOUIS WOODYARD, Jr.  
COMPLAINANT

VS

ELLEN WOODYARD,  
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, JOHN LOUIS WOODYARD, Jr., and humbly complaining against the Respondent, Ellen Woodward, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant is a resident of Baldwin County, Alabama, twenty years of age, and the Respondent is also a resident of Baldwin County, Alabama, twenty years of age.

2.

That your Complainant and the Respondent were married in Pensacola, Florida, on January 30th, 1943, and lived together as husband and wife until May 31st, 1943.

3.

That on, to-wit, May 31st, 1943, the Respondent committed the act of adultery with one Feola Williams; that said act was without the consent or

approval of the Complainant, and that he has not condoned the said act of adultery.

PRAYER FOR PROCESS.

Wherefore, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Ellen Woodyard party Respondent to this Bill of Complaint, requiring her to plead, answer, plead 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 him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent, and that your Honor will give and grant unto him such other, further, different and general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will every pray.

BEEBE & HALL

BY

Solicitors for Complainant.



Received in Sheriff's Office  
this 10 day of June, 1943  
W. R. STUART, Sheriff

Executed June 15 1943  
by serving copy of within Summons and  
Complaint on

Ellen Woodyard

W.R. Stuart Sheriff

By Kucera & Wall Deputy Sheriff

958

JOHN LOUIS WOODYARD,  
COMPLAINANT

vs  
VS

ELLEN WOODYARD,  
RESPONDENT

RECORDED

SUMMONS AND COMPLAINT.

Filed June 9 1943  
Robert  
Ray

Jaley



John Louis Woodyard.  
Complainant,  
Vs. Ellen Woodyard.  
Respondent.



In the Circuit Court.  
In Equity No. \_\_\_\_\_.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent \_\_\_\_\_  
Ellen Woodyard.

by the Sheriff of Baldwin. County, on the 15th day of June.  
194 3.

And it further appears to the Register, that the said \_\_\_\_\_  
Ellen Woodyard.

\_\_\_\_\_, the Respondent, having to the date hereof,  
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,  
on motion of Beebe & Hall. Solicitors  
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,  
and it hereby is, in all things taken as confessed against the said Ellen Woodyard.

This 19th day of July., 194 3.

R. E. Decker  
Register.

**THE STATE OF ALABAMA, }**  
**BALDWIN COUNTY**

No. \_\_\_\_\_ Circuit Court, In Equity.

\_\_\_\_\_  
John Louis Woodyard, Jr. Complainant

Vs.

\_\_\_\_\_  
Ellen Woodyard Defendant

Motion is hereby made for a Decree Pro Confesso against \_\_\_\_\_

\_\_\_\_\_  
Ellen Woodyard Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant \_\_\_\_\_; and that said summons was duly served according to law, and that said Defendant \_\_\_\_\_ has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23 day of July 1943

Beebe & Hall

By: [Signature] Solicitor.S

The State of Alabama,  
Baldwin County.

No. .... CIRCUIT COURT IN EQUITY.

JOHN LOUIS WOODYARD ..... Complainant

vs.

ELLEN WOODYARD ..... Defendant

Motion is hereby made for a Decree Pro Confesso against Ellen Woodyard

Defendant ..

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant....; and that said summons was duly served according to law, and that said Defendant...has...failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 19th day of July 1943

*Beckwith*  
by *Beckwith* ..... Solicitor,

\_\_\_\_\_  
 John Louis Woodyard, Jr.  
 \_\_\_\_\_  
 VS.  
 Ellen Woodyard  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

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, \_\_\_\_\_

~~Decree Pro Confesso against the Respondent~~ Testimonies  
 of John Louis Woodyard, Jr. and Lola Lawrence

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

*R.S. Duck* Register.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,  
Baldwin County.

} NO. \_\_\_\_\_ TERM, 1943.

John Louis Woodyard, Jr.  
Complainant—.

VS.

Ellen Woodyard  
Respondent—.

TO R. S. DUCK, REGISTER:

In the above stated cause a Decree Pro Confesso  
having been entered 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<sup>s</sup> 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.

Beebe & Hall

By: [Signature]

Solicitor<sup>s</sup> for Complainant—.

**RECORDED**

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

\_\_\_\_\_  
John Louis Woodyard, Jr.

Complainant—

VS.

\_\_\_\_\_  
Ellen Woodyard

\_\_\_\_\_  
Respondent—

**Request For Decree In Vacation**

Filed 7-27, 1943

A.S. Luck

Register.

BSB

**RECORDED**

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

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

John Louis Woodyard, Jr.

VS.

Ellen Woodyard

NOTE OF TESTIMONY

Filed in Open Court this 27<sup>th</sup>

day of July 1943

R. S. Duck

Register.

No. ....

Page .....

**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

JOHN LOUIS WOODYARD

COMPLAINANT

vs.

ELLEN WOODYARD

RESPONDENT.

**MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE**

Filed *July 19* 19*47*

*Pro Duct*

Register.

Recorded in ..... Record,

Vol. .... Page .....

Register.



RECORDED

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

The State of Alabama,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

John Louis Woodward, Jr.

Vs.

Ellen Woodward

Motion for Decree Pro Confesso on  
Personal Service

Filed 7 27 1943

*R.S. Duck*

Register.

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

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

Register.

**RECORDED**

No. 958.

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

~~John~~ <sup>W</sup>~~XX~~ <sup>L</sup>ouis <sup>W</sup>oodyard.

Complainant,

Vs.

Ellen <sup>W</sup>oodyard,

Respondent.

**DECREE PRO CONFESSO ON  
PERSONAL SERVICE.**

Issued this 19th day of July,  
1943.



Register.