| | | | A CALL CALL | | |
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| DIVOR | CE DECRE | E | | Printed by | Moore Ptg. |
| | The Char | · · · · · · | 1 | | |
| | The Pigi | te of Alabar | na, Baldwi | n County | |
| | CI | RCUIT COU | RT, IN EQL | ΠТΥ | |
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| | Be | ulah Mee Foot | - | , Complainant | |
| | | v | s. | a | |
| | <u></u> | yde Foote | Na segun a seg | , Respondent | |
| Thi | is cause coming on to | o be heard was submi | tted upon Bill of Co | omplaint, Decree Pro | Confesso |
| <u> </u> | al service | and T | estimony as noted | by the Register and | 1000 00 |
| sideration tl said bill. | uereot, the Court is c | of the opinion that th | e Complainant is er | titled to the relief pr | ayed for |
| 1 | therefore ordered, ac | Ijudged and decreed h | y the Court that th | e bonds of matrimony | , horotofa |
| existing betv | ween the Complainan | t and Defendant be, a | and the same are | hereby, dissolved, an | d that t |
| said | Beuleh Mae | Foote | | is forever divorce | d from t |
| said | - Clyde Foots | ~ | . 1 . | | |
| : | | | | for and on | account |
| | <u>cruelty</u> | | | | |
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| Tt in fa | | | | | |
| to each other | until sixty days afte | ged and decreed that the rendition of thi | neither party to the | is suit shall again ma f appeal is taken wi | rry excep |
| days, neither | party shall again ma | arry except to each ot | her during the pend | l'appeal is taken wi lency of said appeal. | thin sixt; |
| It is fu | rther ordered that th | he Complainant and | Respondent be, an | nd they are hereby p | ermitted t |
| again contract | t marriage upon the | payment of the cost o | f this suit. | | |
| | | - Bauleh Mee 1 | | | |
| the | Complainant | pay the cost herei | n to be taxed, for | which execution may i | ssue. |
| This | 19thday of | February | | , 19 <i>54</i> | |
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| | | | | Judge Circuit Court, | |
| I, | | | | , Register of 1 | the Circuit |
| | | Judge of the Circu | ect copy of the or it Court in the above | a, do hereby certify riginal decree rendere te stated cause which | that the |
| | | cree is on file and | enrolled in my offic | e. | |
| | · ••••• | . Witness my | hand and seal this | the | day |
| | | of | , 19 | | |
| | | | | er of Circuit Court, Ir | |
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| 2 # | | | Kegist | er of Chedit Court, fr | ı Equity. 🍣 |

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| EHE STATE OF ALABAMA, Boildwin County. CIRCUIT COURT FO: Pixis Patensen FO: Pixis Patensen KNOW YE: that we, having full faith in your prudence and competency, have appointed y Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examine ENOW YE: that we, having full faith in your prudence and competency, have appointed y Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examine Eaulah Mas_Ecots in a cause pending in concept as witnesses in behalf of Eaulah Mas_Ecots in a cause pending in concept Chrouit Court in Baldwin County, of said State, wherein Paulah Mas_Ecots in a cause pending in concept Chrouit Court in Baldwin County, of said State, wherein Paulah Mas_Ecots in a cause pending in concept Chrouit Court in Baldwin County, of said State, wherein Paulah Mas_Ecots in a cause pending in concept as witnesses in behalf of Complainant Respondent in a cause pending in concept Chrouit Court in Baldwin County, of said State, wherein Paulah Mas_Ecots in a cause pending in concept and Clyde Ecots Respondent in a cause pending in concept in a cause pending in concept | and and a second se Second second | | | | | | | | |
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| Baldwin County. IO: | THE STATE O | F ALABAMA | .] | CI | RCU | ТТ | cou | RT | |
| KNOW YE: that we, having full faith in your prudence and competency, have appointed y Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examinePoulah Map_Footp andP | Baldwin | County. | | • | | | | | |
| KNOW YE: that we, having full faith in your prudence and competency, have appointed y Commissioner, and by these presents do authorize you, at such time and place as you may appointed to call before you and examineEpulah Map_Ecots | | | : | | | | | ÷ | 2 |
| KNOW YE: that we, having full faith in your prudence and competency, have appointed y Commissioner, and by these presents do authorize you, at such time and place as you may appointed to call before you and examine | ro: <u>7,</u> | a Detargon_ | | | ÷ | | · · · · | : | |
| Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examineRespondent as witnesses in behalf ofRespondent Circuit Court in Baldwin County, of said State, wherein in a cause pending in of Circuit Court in Baldwin County, of said State, wherein in a cause pending in of Circuit Court in Baldwin County, of said State, wherein, Complainant and, Complainant and | | | | . • | | | | | |
| Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examineRespondent as witnesses in behalf ofRespondent Circuit Court in Baldwin County, of said State, wherein in a cause pending in of Circuit Court in Baldwin County, of said State, wherein in a cause pending in of Circuit Court in Baldwin County, of said State, wherein, Complainant and, Complainant and | | · · · · · · | | | | | | : | |
| Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examineRespondent as witnesses in behalf of Eulah Mas_Foots in a cause pending in of Circuit Court in Baldwin County, of said State, wherein has Foots Circuit Court in Baldwin County, of said State, wherein, Complainant and, Complainant and, Complainant and | . <u> </u> | | | ······································ | 1 | , p | | | |
| Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examineReportsandPDCobb | - | | | | | | | | <u></u> |
| Commissioner, and by these presents do authorize you, at such time and place as you may appoint o call before you and examineRespondent as witnesses in behalf ofRespondent Circuit Court in Baldwin County, of said State, wherein in a cause pending in of Circuit Court in Baldwin County, of said State, wherein in a cause pending in of Circuit Court in Baldwin County, of said State, wherein, Complainant and, Complainant and, Complainant contact, to be by you administered, upon, Clyde Foots to take and certify the depositions_ of the witness_s and return the same to our Court, with | KNOW YE t | at we having fu | ll faith in vo | our pruden | ce and c | ompe | tency, ha | ive appo | inted v |
| o call before you and examine <u>Peulah Mas Foots</u> and <u>F. D. Cobb</u> as witnesses in behalf of <u>Peulah Mas Foots</u> in a cause pending in o Circuit Court in Baldwin County, of said State, wherein <u>Peulah Mas Foots</u> , Complainant and <u>Clyde Foots</u> | | | | | | | | | |
| as witnesses in behalf of <u>Peulah Mas Foots</u> in a cause pending in o Circuit Court in Baldwin County, of said State, wherein <u>Peulah Mas Foots</u> | | | | - | | | - | - | y appoi |
| Circuit Court in Baldwin County, of said State, wherein <u>Peulah Mas Foots</u> , Complainant , Complainant and <u>Clyde Foots</u> Respondent on oath, to be by you administered, upon <u>Clyde Foots</u> to take and certify the depositions of the witnesss and return the same to our Court, with | to call before you | and examine \underline{P} | <u>eulah Mae</u> | Foota | and | P | D.Cob | <u>h</u> | |
| Circuit Court in Baldwin County, of said State, wherein <u>Peulah Mas Foots</u> , Complainant and <u>Clyda Foots</u> | | · | | | | | | | |
| Circuit Court in Baldwin County, of said State, wherein <u>Peulah Mas Foots</u> , Complainant , Complainant and <u>Clyds Foots</u> Respondent on oath, to be by you administered, upon <u>Clyds Foots</u> to take and certify the depositions of the witnesss and return the same to our Court, with | | | | | | | | | |
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| Circuit Court in Baldwin County, of said State, wherein <u>Peulah Mas Foots</u> , Complainant , Complainant and <u>Clyde Foots</u> Respondent on oath, to be by you administered, upon <u>Clyde Foots</u> to take and certify the depositions of the witnesss and return the same to our Court, with | | | | | | | | | |
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| Circuit Court in Baldwin County, of said State, wherein <u>Peulah Mas Foots</u> , Complainant and <u>Clyde Foots</u> Respondent on oath, to be by you administered, upon <u>Clyde Foots</u> to take and certify the depositions of the witnesss and return the same to our Court, with | | | | | | | | | |
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| , Complainant and, Complainant , | as witnesses in b | ehalf of <u>Peu</u> | lah Mee F | Poote | | | in a caus | se pendi | ng in c |
| , Complainant andClyde Foote | | | | | | | | - | ng in c |
| , Complainant andClyde Foote | | | | | | | | - | ng in c |
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| to take and certify the depositions of the witnesss and return the same to our Court, with | Circuit Court in B | aldwin County, of | said State, w | wherein | Paulal | h Me | • Foot | _, Comp | blainant |
| | Circuit Court in B | aldwin County, of | said State, w | wherein | Paula | h Ma | • Foot | _, Comp | plainant |
| convenient speed, under your hand. | Circuit Court in B | aldwin County, of | upon <u>C1</u> | wherein | Paulal | h Ma | • Foot | _, Comp | plainant |
| | Circuit Court in B | aldwin County, of | upon <u>C1</u> | wherein | Paulal | h Ma | • Foot | _, Comp | plainant |
| Witness _ 17th day of _ Extrany, 195/ | Circuit Court in B | aldwin County, of | upon <u>C1</u> | wherein | Paulal | h Ma | • Foot | _, Comp | plainant |

Commissioner's Fee, \$_____ Witness' Fees, \$_____ Register.

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| Baldwin County CIRCUIT COURT | | | | |
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| Beulah Mae Foote Complainant | | | | |
| VS. Clyda Foota | | | | |
| Defendant— COMMISSION TO TAKE DEPOSITION | | | | |
| COMMISSIONER Dixie Peterson | | | | |
| WITNESSES: | | | | |
| Beulah Mae Foote B. D. Cobb | | | | n for the second se |
| | | and the second se | | • |

| Beulah May F | oote | | |
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| | ing | | THE STATE OF ALABAMA |
| | | 34 | - Baldwin County |
| Clyde Fcote | inter XS. (may) (may) | | |
| | ing the second s | | IN EQUITY |
| n the second sec | | | - Circuit Court of Baldwin County |
| | | | Chount of Bulawin County |
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| This cause is | submitted in be | half of Compla | int upon the original Bill of Complaint. |
| This cause is Testimony of C | | | int upon the original Bill of Complaint, |
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| Testimony of C | omplainant ar | nd Witness, E | 9. D. Gobb |
| | omplainant ar | nd Witness, E | 9. D. Gobb |
| Testimony of C | omplainant ar | nd Witness, E | 9. D. Gobb |
| Testimony of C | omplainant ar | nd Witness, E | 9. D. Gobb |

No. THE STATE OF ALABAMA **Baldwin County** IN EQUITY **Circuit Court of Baldwin County** VS. NOTE OF TESTIMONY Filed in Open Court this 16 Chday of Fibruary Deicefieuer Register. Printed by the Baldwin Times

| 8600 Motion fo | r Decree Pro Confesso on Person | al Service. | 3107 Code | |
|-----------------|--|---------------------|--|---|
| | | | ······································ | <u> </u> |
| THE STA Ba | TE OF ALABAMA,) Idwin County | No | Circuit (| Court, In E |
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| | | | | Complai |
| | | Vs. | | |
| | CINTE FOOTE | | - | $\mathcal{D}_{\mathcal{A}}$ ($\mathcal{A}_{\mathcal{A}}$ |
| | | | | Defend |
| Motion is hereb | y made for a Decree Pro Confess | o against <u>CL</u> | ZDE FOOTE | |
| | | | | Defend |
| upon said Defen | ted cause, on the ground that mo dant; and that said summons demur, plead to or answer the F | was duly served a | coording to law, ar | id that said Defe |
| | l6thday ofFebr | nary | 1954 | • |
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| BI | EULAH MA V | <u>\E_FOOT</u> /s. | <u>ነበ.</u> | | |
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| Motion f | or Decree Persona | e Pro C l Servic | onfesso e | o on | |
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| | Paulah Mas_Foots Complainant, | In the Circuit Court. | |
| | Vs. | In Equity No | |
| | <u>Clyde Foote</u> Respondent. | III Equity Ho. | |
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| | DECREE BRO CONFES | SSO ON PERSONAL SERVICE. | |
| | DECKLE FILO COMPL | | |
| | | hat common was had on the Respondent | |
| a di di | In this cause, it appears to the Register, the | hat service was had on the respondent | |
| la prilo - Seconda - An | <u>ClydesFootes</u> | <u> </u> | |
| s Setter | antes dage d | | |
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| | by the Sheriff of Paldwin | County, on the <u>llth</u> day of <u>January</u> | |
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| | And it further appears to the Register, th | nat that the said <u>Clyde Foote</u> | |
| | And it further appears to the Register, th | nat that the said <u>Clyde Foote</u> | |
| | And it further appears to the Register, th | , | ate here |
| | · | the Respondent, having to the da | |
| | failed to plead, demur to or answer the Bill | the Respondent, having to the da of Complaint filed in this cause, it is now, | |
| | failed to plead, demur to or answer the Bill | the Respondent, having to the da of Complaint filed in this cause, it is now, | , therefo |
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BEULAH MAE FOOTE Complainant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

CLYDE FOOTE Respondent

VS.

IN EQUITY

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, SITTING IN EQITY:

Your complainant Beulah Mae Foote, respectfully represents and shows unto your Honor:

l. That the complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama and has been a bona fide resident of said State for more than one year next preceding the filing of this bill of complaint. That Clyde Foote is over the age of twenty-one years and resides in Baldwin County, Alabama.

2.That your complainant and respondent were lawfully married March 15, 1951, at Portsmouth, Virginia and that of this marriage there are no children.

3. Your complainant avers and charges that the said respondent did on or about the Ninth day of January, 1954, and many times subsequent thereto assault, beat, hit, strike the 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 commitaan actual violence upon her body, attended with danger to her life or health.

The premises considered, your complainant makes the said Clyde Foote a party respondent to this bill of complaint, and in order that conplainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said Clyde Foote, commanding him to answer plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, granting the complainant reasonable attorney's fees for her solicitor if this cause be contested; and that your Honor will grant such other, further or different relief as unto your Honor may seem just and proper.

1100 ATTORNEY FOR 78 COMPLATMANT



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

BUELAH MAE FOOTE Complainant

CLYDE FOOTE Respondent *****

Vs.

BILL OF COMPLAINE

gilen 1-11-5-11 aucit neme k Rigestee

ARTHUR C. EPPERSON ATTORNEY AT LAW FOLEY, ALA.

| ORAL | DEP | OSITIC | 22 |
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Printed by Moore Printing Co.

| The State of Alabama, Baldwin County. | { | Circuit Court of Baldwin Count (In Equity) | y, Alabama |
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| and a second | | a sa | |
| <u> </u> | MAE | FOOTE Complai | nant |

| tan ang ang tang tang tang tang tang tan | | vs. | • • • • • • • • • • • • • • • • • • • | a ganakan ar ta ta |
|--|----------------|--|--|---|
| _ | CLYDE FOOTE | | - Respondent | |
| τ | Dixie Peterson | | | a geografia de la composición de la com La composición de la c |
| as Register and | Commissioner | ······································ | al en productiones normalistationes | |
| · · · · | | BEULAH MAE FOOTE | | |
| - | and B. D. Cohr | <u></u> | | n na |

witness <u>ES</u> named in the Requirement for Oral Examination, on the <u>L2</u> tday of <u>February</u> 1954, at the office of <u>Divis Peterson</u> in <u>Folsy</u>, <u>Alabama</u>, Alabama, and having first sworn said Witness <u>S</u> to speak the

truth, the whole truth, and nothing but the truth, the said ______ Poulah Mae Foote

_____doth depose and say as follows:

My name is Beulah Mae Foote. I am over the age of twanty-one years and have resided in Baldwin County, Alabama for more than two years before beginning this suit for divorce. Clyde Foote is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

Civde Foote and myself were married lawfully on March 15, 1951 at Portsmouth Virginia. We do not have any children. On January ninth 1954, Clyde came in off of his shrimp beat and immediately started drinking heavy as he always does when he is ashore. After he has had a few drinks and other things he wants he starts getting mean. Nearly everytime he is in from shrimping he beats me up. This time he started being disagreeable right away and hit me several times during the afternoon. That night he kept drinking more and started accusing me of sleeping with other men. I tried to get him to stop drinking and not to talk foolishly as he knew I had not been going out with other men. He got very mad and said he was going to kill me this time and then jumped on me and started beating me up. I am afraid that if I ever live with him again or if he got me off alone that he would kill me.

Beulah Mar Foste.

My name is B. D. Cobb. I am Town Constable for the City of Foley. I am acquainted with Beulah Mae Foote and Clyde Foote. They have resided in Foley for a couple of Years. I have on several occasions been called on in my duties as constable to go to their house and stor Clyde Foote from beating up on Beulah Mae Foote his wife. I do not recall the exact date last time but it was around the first week in January of this year. Mrs. Foote was considerably bruised up from the result of Clyde Foote beating her.

ORAL EXAMINATION DIXIE PETERSON ____, as Register and Commissioner hereby certify I,-that the foregoing deposition S on Oral Examination was taken down by me in writing in the words of the witness_gg_and read over to_them__and_they___signed the same in the presence of myself Divie Peterson at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness_BS or had proom made before me of the identity of said witness BS___; 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_18th____day of_____Februa, 19_<u>54</u> 97 (L.S.) Filed No. Vol Baulah Maa Foota Clyds_Foots In Circuit Court, In Equity The State of Alabama Baldwin County. Recorded in)eposition . WS AULLA Register Page Page Complainant Respondent, Register Record 195.4

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