

THE STATE OF ALABAMA }
Baldwin County }

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

Beverly Rigsby, by John Styron _____ COMPLAINTANT
her father and next friend
vs.

Leonard Rigsby _____ RESPONDENT

I, _____ Virginia Keel _____

as _____ Register and Commissioner _____

have called and caused to come before me _____ Beverly Rigsby and _____ John Styron _____

witness _____ es _____ named in the requirement for Oral Examination, on the _____ 22nd day of _____ January _____
1944 _____, at the office of _____ Beebe & Hall _____

in _____ Bay Minette _____, Alabama, and having first sworn said witness _____ to speak the
truth, the whole truth, and nothing but the truth, the said _____ Beverly Rigsby _____

_____ doth depose and say as follows:

My name is Beverly Rigsby. I am a bona fide resident of Baldwin County, Alabama, and am seventeen years of age. I am living with my father, John Styron at Bon-Secour, Alabama.

The Respondent, Leonard Rigsby, is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama.

The Respondent and I were married at Mobile, in Mobile County, Alabama, December 27, 1942. We lived together as husband and wife until October 20, 1943.

On October 20th, 1943, the Respondent threatened and abused me and did actual violence to my person by choking me; that he threatened to kill me with a gun; that at various times hereto he had threatened, cursed and abused me and did actual violence to my person; that said acts of violence to my person on the several occasions necessarily endangered my life and health.

I left the Respondent on several occasions as a result of his abusing me and mistreating me but went back to him with the hope that he would change and we could live together, however, the conditions grew worse until I just had to leave him on October 20th, 1943, when he abused me and threatened to take my life with a gun.

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 further actual violence to my person which would necessarily endanger my life and health or that he would carry out his threats and choke me.

It was absolutely impossible for me to live with the Respondent.

Beverly Rigsby

John Styron, a witness for the Complainant, being first duly sworn, deposes and says:

My name is John Styron. I live at Bon Secour in Baldwin County, Alabama. I am the father of Beverly Rigsby, who is now seventeen years of age, and is living with me.

I know of my own personal knowledge that during the time that she was living, or trying to live with Leonard Rigsby that he often threatened and abused her and on several occasions did actual violence to her person which necessarily endangered her life and health. I prevailed upon her to do everything possible to make her married life a success but when the respondent on October 20, 1943, choked her and threatened to kill her with a gun I advised her to no longer subject herself to the bad treatment of the Respondent as he might and probably would carry out his threats and kill her.

John Styron

I, Virginia Keel as Register and Commissioner hereby certify that the foregoing deposition 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 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 22nd day of Janvary 1944

Virginia Keel (L. S.)

No. 1050
 Page _____
THE STATE OF ALABAMA,
 BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

VS.

RESPONDENT

ORAL DEPOSITION

Filed 23, 1944

Virginia Keel, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

1050

The State Of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

BEVERLEY RIGSBY, BY JOHN STYRON, Complainant
HER FATHER AND NEXT FRIEND
VS
LEONARD RIGSBY Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decrees Pro Confesso on answer and waiver of Respondent 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 BEVERLEY RIGSBY is forever divorced from the said

LEONARD RIGSBY
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 BEVERLEY RIGSBY AND LEONARD RIGSBY be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that LEONARD RIGSBY the RESPONDENT pay the cost herein to be taxed, for which execution may issue.

This 24th day of January, 1944 -
J. M. 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. 1050 Page.....

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

BEVERLEY RIGSBY

vs. Complainant.

LEONARD RIGSBY

Respondent.

DIVORCE DECREE

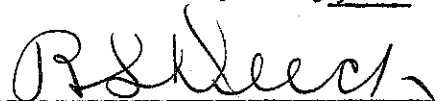
Filed 1-23-44

STATE OF ALABAMA
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA- GREETINGS:

WE COMMAND YOU, that you summon LEONARD RIGSBY to be and appear before the Judge of the Circuit Court of Baldwin County, 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 BEVERLEY RIGSBY against the said LEONARD RIGSBY, 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 thereof, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this 22
day of January, 1944.


Register.

BEVERLEY RIGSBY, BY JOHN STYRON,
HER FATHER AND NEXT FRIEND,

COMPLAINANT

VS

LEONARD RIGSBY

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, BEVERLEY RIGSBY, by John Styron, her father and next friend, and humbly complaining against the Respondent, LEONARD RIGSBY, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant is a bona fide resident of Baldwin County, Alabama, and is seventeen years of age; that the Respondent is a bona fide resident of Baldwin County, Alabama, and is over twenty one years of age;

2.

That they were married at Mobile, Mobile County, Alabama, on December 22nd, 1942, and lived together as husband and wife in Baldwin County, Alabama, until October 20th, 1943.

3.

That on, to-wit, October 20th, 1943, the Respondent threatened and

abused the complainant, and did actual violence to her person by choking her; that he threatened to kill her with a gun; 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 Leonard Rigsby 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 *Wm. Lee*
Solicitors for Complainant.

The State of Alabama, {
Baldwin County

CIRCUIT COURT

To Virginia Keel

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 Beverley Rigsby and John Styron

as witnesses in behalf of Beverley Rigsby in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Beverley Rigsby

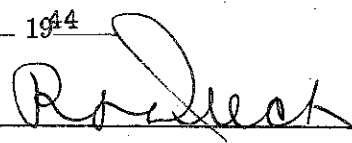
Complainant

and Leonard Rigsby

Defendant,

on oath to be by you administered, upon _____
to take and certify the deposition... of the witness.... and return the same to our Court, with all convenient speed, under your hand.

Witness 21st day of January 1944



REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

BEVERLEY RIGSBY, BY JOHN STYRON
HER FATHER AND NEXT FRIEND
Complainant,
VS.
LEONARD RIGSBY
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from
Bay Minette, in the County of Baldwin

Alabama, the place of trial of said cause, to-wit:

Beverley Rigsby and John Styron

2. That said complainant requires an oral examination of said witnesses before a commissioner appointed by the Register of this Court.

BEEBE & HALL
BY *[Signature]*
Solicitor for Complainant.

NOTE:

Complainant suggests the name of Virginia Keel

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

BEEBE & HALL
BY *[Signature]*
Solicitor for Complainant.

BEVERLEY RIGSBY, BY JOHN STYRON)
HER FATHER AND NEXT FRIEND)
COMPLAINANT)

VS

LEONARD RIGSBY

RESPONDENT

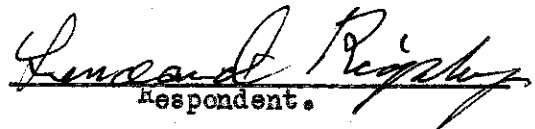
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

And now comes the Respondent in his own proper person, and accepts service of the summons and complaint in this cause, and waives any further notice.

The Respondent admits that he and the Complainant were married at Mobile, Alabama, on December 22nd, 1942, and that they lived together as husband and wife until October 20th, 1943.

He expressly denies that he at any time was cruel to the Complainant, or that he committed actual violence to her person, 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 consents that this matter be submitted forthwith for final decree without further notice.


Respondent.

Witness:

H. B. Snell.

James 1944
James
James

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BT-6-40-500

DEMAND FOR ORAL EXAMINATION.

BEVERLEY RIGSEY, BY JOHN STYRON,
HER FATHER AND NEXT FRIEND
Complainant,

Vs.

LEONARD RIGSEY
Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA—IN EQUITY.

Filed this 21 day of June,

1944

R. R. Rouse

Register.

No. 1050

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

Beverley Rigsby, by John Styron
her father and next friend

Complainant

vs. Complainant

Leonard Rigsby

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

1050

RECORDED

BEVERLY RIGSBY, BY JOHN STYRON
HER FATHER AND NEXT FRIEND,
COMPLAINANT

VS

LEONARD RIGSBY
RESPONDENT.

SUMMONS AND COMPLAINT.

Filed June 29, 1944
P. J. [Signature]

BEVERLEY RIGSBY, BY JOHN STYRON
 HER FATHER AND NEXT FRIEND
 COMPLAINANT
 VS.
 LEONARD RIGSBY
 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 _____

 Register.

RECORDED

No. 1050

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

BEVERLEY RIGSBY, BY JOHN

STYRON, HER FATHER AND NEXT FRIEND

COMPLAINANT

VS.

LEONARD RIGSBY

RESPONDENT

NOTE OF TESTIMONY

Filed in Open Court this 22

day of Jan 1944

D. Dech
Register.