

1672

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

OTIS O. HOBBS, Complainant

VS.

VERDA HOBBS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~DEKKA PROCEEDINGS~~ Amended Bill of Complaint, and Answer 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 Otis O. Hobbs is forever divorced from the said Verda Hobbs

for and on account of Abandonment. The said Verda Hobbs is hereby awarded the care, custody and control of Odessa Hobbs and Treva Hobbs. Otis O. Hobbs shall have the right to visit said children at any reasonable time. Otis O. Hobbs shall pay Verda Hobbs the sum of \$30.00 per month on the 1st day of each month for the support of said children.

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 Otis O. Hobbs, the Complainant, pay the cost herein to be taxed, for which execution may issue.

This 2nd day of March, 1946

[Signature] 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. 1072 Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

OTIS O. HOBBS,

vs. Complainant

VERDA HOBBS,

Respondent

DIVORCE DECREE

Filed this 2nd day of

March, 1948

R.S. Powell
Register

OTIS O. HOBBS,
COMPLAINANT

VS
VERDA HOBBS
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN CHANCERY

No. 1072

And now comes the Defendant and demurs to the Complainant's Bill of Complaint, and for grounds thereof sets out the following, separately and severally:

1.

That there is no equity in the bill.

2.

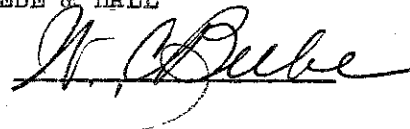
That the said Bill does not charge an offense in the form and manner required by law;

3.

That the said Complaint does not set out grounds authorizing the granting of a divorce.

BEEBE & HALL

By



OTIS HOBBS,
COMPLAINANT,
VS
VERDA HOBBS,
RESPONDENT

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

Now comes the Respondent and agrees that this cause be submitted forthwith for final decree upon the pleading and testimony on behalf of the Complainant.

The Respondent agrees that thirty dollars per month is a reasonable amount to be paid by the Complainant for the maintenance and support of their minor child, whose custody ~~is~~ to be awarded to the Respondent.

Dated this the 28th day of February, 1946.

Verda Hobbs.

BEEBE & HALL,

BY J. L. Hall
Solicitors for the Respondent.

VERDA HOBBS,

Complainant,

VS.

OTIS O. HOBBS,

Respondent.

IN THE

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

IN EQUITY.

The Complainant having filed her petition herein stating that the Respondent had failed to comply with the previous orders of this Court with reference to Alimony-

IT IS ORDERED that said petition be set down for hearing on Friday, August 2, 1946, at 10 o'clock A. M., and that the Sheriff of Baldwin County, Alabama, serve notice on the Respondent Otis O. Hobbs, to be and appear before me at the Court house in Bay Minette at 10 o'clock A. M. on the 2nd day of August, 1946, to show cause why he should not be adjudged in contempt of court.

This 23rd day of July, 1946.

F. W. Hare

JUDGE

OTIS O. HOBBS,)	
Complainant,)	IN THE CIRCUIT COURT OF
VS.)	
VERDA HOBBS,)	BALDWIN COUNTY, ALABAMA,
Respondent.)	IN EQUITY.

Comes the Complainant in the above styled cause and amends his Bill of Complaint filed in said cause so that the same shall read as follows:

Your Orator, Otis O. Hobbs, humbly complaining of the Respondent, Verda Hobbs, in a matter of Divorce shows unto your Honor and unto this Court as follows:-

FIRST:

That both the Complainant and the Respondent are over the age of twenty-one years and resident citizens of Baldwin County, Alabama, residing near Foley. That your Complainant has been a resident of such County all of his life.

SECOND:

That your Complainant married Verda Hobbs on to-wit, February 17, 1937 and they lived together as man and wife until January, 1943, at which time the said Respondent voluntarily abandoned the Complainant without just cause or legal excuse and she has failed and refused to live with him as his wife since that time.

THIRD:

That the said Respondent is the mother of Odessa Hobbs, age seven and Treva Hobbs, age six and she is a fit and proper person to have the care, custody and control of said minors. That the Complainant is a farmer and his income is uncertain but Complainant has been paying the sum of \$30.00 a month for the maintenance and support of said minor children.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Orator prays that upon a final hearing of this cause that your Honor will grant unto your

Orator an absolute Diverce from the said Verda Hobbs and that your Honor will enter such other, further and different orders and decrees as in equity may seem just and mete and your Orator will ever pray, etc.

Chas O Hall
Complainant.

OTIS O. HOBBS,
Complainant,
VS.
VERDA HOBBS,
Defendant.

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

This cause coming on to be heard is submitted on demurrer to bill of complaint, and upon consideration, I am of the opinion that the demurrer is not well taken.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that said demurrer be and the same is hereby overruled.

This 31st day of May, 1944.



Judge

(
)
XXXXX
Y
Y
Y
Y
Y

VERDA HOBBS.

Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

VS.

OTIS O. HOBBS

Respondant.

TO THE SHERIFF OF BALDWIN COUNTY, ALABAMA.

You are hereby commanded to cite the Respondant.

Otis O. Hobbs to be and appear before me at Bay Minette,
Ala on the 2nd day of August 1946, and show
cause as to why he should not be adjudged in contempt of Court and
punished accordingly for an alleged violation of a decree of this Court
made and entered on the 2nd day of March, 1946.

You will serve a copy of this order on the said Otis O. Hobbs and make your return on the original order.

This 23rd day of July 1946.

J. N. Hare
Judge.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

Circuit Court

To Evelyn Nelson

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 Otis O. Hobbs

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Otis O. Hobbs is

Complainant
and Verda Hobbs is

Respondent

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

Witness 28th day of February, 19 46

R. Beck

Register

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

OTIS O. HOBBS, Complainant

VS.

VERDA HOBBS, Respondent

I, Evelyn Nelson
as ~~Notary Public~~ Commissioner
have called and caused to come before me Otis O. Hobbs

witness named in the Requirement for Oral Examination, on the 28th day of February
1946, at the office of Hybart & Chason
in Bay Minette, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Otis O. Hobbs
doth depose and say as follows:

TESTIMONY OF OTIS O. HOBBS

My name is Otis O. Hobbs; I am the Complainant in a suit for Divorce filed in the Circuit Court of Baldwin County, Alabama, In Equity, in which Verda Hobbs is the Respondent. Both Verda Hobbs and I are over the age of twenty-one years and resident citizens of Baldwin County, Alabama, where I have lived all my life. I married Verda Hobbs on February 17, 1937 and we lived together as man and wife until January, 1943 when she voluntarily abandoned me without just cause or legal excuse and she has failed and refused to live with me as my wife since that time. Verda Hobbs is a fit and proper person to have the care, custody and control of Odessa Hobbs, age seven and Treva Hobbs, age six, her minor children. I am able to pay the sum of \$30.00 a month for the support and maintenance of said minors.

Otis O. Hobbs

OTIS O. HOBBS,
Complainant,
Vs.
VERDA HOBBS,
Defendant.

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

TO THE HONORABLE THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
IN EQUITY, AND TO THE HONORABLE F. W. HARE, JUDGE THEREOF:-

Your Orator Otis O. Hobbs humbly complaining of
the Defendant Verda Hobbs in a matter of divorce shows unto
your Honor and unto this Court as follows:-

FIRST:

That he resides near Foley in Baldwin County,
Alabama, and has been such a resident all his life; that he is
over the age of twenty-one years; that the Defendant Verda Hobbs
is over the age of twenty-one years and resides near Foley in
Baldwin County, Alabama.

SECOND:

That your Complainant married the said Verda Hobbs
on to-wit, February 17, 1937, and they have lived together as
man and wife until on account of the matter hereinafter referred
to, your complainant was compelled to leave the Defendant and
live separate and apart from her; that in the latter part of
1942 your complainant was employed at the Alabama Drydock and
Shipbuilding Company in Mobile and was working on a night shift;
that on several occasions while your complainant was at work,
the said Verda Hobbs would go riding with other men and stay out
until very late at night, sometimes as late as three or four
o'clock in the morning; that in the latter part of 1942 the
Defendant Verda Hobbs became pregnant; that about the time she
became pregnant she was having dates with Roscoe Jackson, who
resides at Foley in Baldwin County, Alabama; that on January 26,
1943 the Defendant was about five months pregnant and she told
your Complainant at that time that she had committed acts of
adultery with Roscoe Jackson and that the baby she was pregnant
with was not the child of your complainant, but was the child of

OTIS O. HOBBS,
COMPLAINANT

VS

VERDA HOBBS,
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

No. 1072

And now comes the Respondent and for answer to the Complainant's bill of complaint and to each paragraph thereof, says:

ONE:

The admits the allegations contained in Paragraph FIRST.

TWO:

She admits the allegations contained in Paragraph SECOND that she and the Complainant are husband and wife, but most positively denies all the other allegations contained in Paragraph SECOND and demands strict proof of the same.

THREE:

The Respondent denies each and every allegation contained in said bill of complaint not herein expressly admitted, and demands strict proof of the same.

And for further answer to the Complainant's bill of complaint, Respondent says she has no property and no money, and no means of employing counsel to represent her in this cause; that the Complainant is an able bodied man and now earns somethinglike \$100.00 per month.


WHEREFORE, the premises considered, the Respondent prays that your Honor will, by proper process, make the said Otis Hobbs party respondent to this, her cross bill, and that she be required to plead, answer or demur to the same within the time and under the penalties prescribed by law.

The Respondent further prays that your Honor will order a reference to determine a reasonable attorneys fee to be paid by the Complainant to the Respondent, and also alimony pen dente lite to be paid by the complainant to the respondent.

Respondent further prays, upon a final hearing hereof, your Honor will enter an order and decree requiring the Complainant to pay to the Respondent such amount as may seem meet and proper for her maintenance and support.

Respondent further prays 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 Respondent-Cross
Complainant.

OTISA HOBBS,
COMPLAINANT
VS
VERDA HOBBS,
RESPONDENT

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

Now comes your Complainant and respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That a decree of Divorce was by this Court on March 2, 1946 granted in the above styled cause.
2. That in, by and as a part of said decree, the Respondent was required to pay to the Complainant the sum of \$30.00 per month as permanent allimony.
3. That the Respondent has failed and refused to comply with the terms and conditions of said decree.

WHEREFORE, the Premises considered, the Respondent prays that your Honor will issue a Citation to the Complainant requiring him to appear and show cause why he has not complied with the terms and conditions of the decree of the Court, and why he should not be adjudged in Contempt of Court.

Sworn to and Subscribed by me on this the 26th day of April, 1946.

Mrs Verda Hobbs

Notary Public, Baldwin County, Ala.

OTIS O. HOBBS,
Complainant,
VS.
VERDA HOBBS,
Respondent.

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

Comes the Complainant in the above styled cause and demurs to the Cross-Bill filed by the Respondent in said cause, and as grounds therefor, says:-

FIRST:

That the Respondent could obtain the relief prayed for, if she is entitled to such relief, under her Answer.

SECOND:

That according to Equity Rule #26 of the 1940 Code of the State of Alabama the relief prayed for by the Cross Bill of the Respondent could be obtained under her Answer if she was entitled to such relief.

Robert A. Mason
Solicitors for Complainant.

ORAL EXAMINATION.

I, Evelyn Nelson, as ~~Register~~ Commissioner hereby certify

that the foregoing deposition—on Oral Examination was taken down by me in writing in the words of the witness—and read over to him and he signed the same in the presence of myself and John Chason

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness—or had prom made before me of the identity of said witness—; 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 28th day of February, 1946.

Evelyn Nelson
(L.S.)

NO. 1072 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Otis O. Hobbs
vs. Complainant

Verda Hobbs
Respondent.

Oral Deposition

Filed Feb 25, 1946
[Signature], Register.

Recorded in _____ Record

Vol. _____ Page _____
_____, Register.

No. 1072

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

OTIS O. HOBBS

Complainant

VS.

VERDA HOBBS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

Executed 31 July 19 46
by serving copy of Writ of Summons and
Complaint on Verda Hobbs

C. E. Powell Sheriff
BY J. E. [unclear] Deputy Sheriff

VERDA HOBBS.
Complainant.

VS.

OTIS O. HOBBS.
Respondant.

C I T A T I O N

1872

Recd Just 1944
P. L. Edwards
Gwynn

AMENDED BILL OF COMPLAINT

OTIS O. HOBBS,

Complainant,

VS.

VERDA HOBBS,

Respondent.

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

FILED: February 28, 1946


Registrar.

Kalls
de
Kalls

Order

John G. Kelly
24-1546

10/13

Dee Webb

Dee Webb

[Signature]

[Signature]
Cecil Lee 28/1944

OTIS O. HOBBS, COMPLAINANT

VS

VERDA HOBBS, DEFENDANT

DEMURRER.

2000 11-4-44
R. Robert
Hobbs

OTIS O. HOBBS,
Complainant,

vs.
VERDA HOBBS,
Respondents.

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, Amended
Bill of Complaint and the Testimony of Otis O. Hobbs

and in behalf of Defendant upon

Hybart A. Hasen
Register.
Selectors for Complainant

No. 1072

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

OTIS O. HOBBS,

Complainant,

vs.

VERDA HOBBS,

Respondent

NOTE OF TESTIMONY

Filed in Open Court this

day of

28 Jul

1946

Register.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. 1072.

CIRCUIT COURT BALDWIN COUNTY

Feb. TERM, 1944

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon VERDA HOBBS.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

VERDA HOBBS.

Respondent.

by OTIS O HOBBS.

Complainant

Witness my hand this 29th day of February, 1944

R. H. H. Clerk.