

1075

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

VIOLA PETTIS

Complainant

VS

ZYLE ELBERT PETTIS

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 VIOLA PETTIS is forever divorced from the said

ZYLE ELBERT PETTIS

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 Viola Pettis and Zyle Elbert Pettis be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Zyle Elbert Pettis the Respondent pay the cost herein to be taxed, for which execution may issue.

This 2nd day of March, 1944
F. M. Hase
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. 1075

RECORDED
Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

VIOLA PEPPIE

vs. Complainant.

ALF. ALBERT PEPPIE

Respondent.

DIVORCE DECREE

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To Bernice S. Reid

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 Viola Pettis

Georgia Graham

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

VIOLA PETTIS

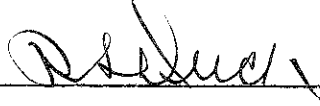
Complainant

and ZYLE ELBERT PETTIS

Defendant,

on oath to be by you administered, upon March 2nd, 1944
to take and certify the deposition s. of the witnesses. and return the same to our Court, with all convenient speed, under your hand.

Witness 2nd day of March 19 44



REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

VIOLA PETTIS,
COMPLAINANT
VS
ZYLE ELBERT PETTIS
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.

The Respondent denies each and every allegation contained in the Complainant's bill of complaint, and waives notice of the time of taking testimony on behalf of the complainant, right to cross examine complainant's witnesses, and consents that this cause be submitted forthwith for final decree without further notice.

Zyle Elbert Pettis
Respondent.

WITNESS:

Subscribed and sworn to before me this

18 day of Feb, 1944

Cherry B. Davis Notary Public
IN AND FOR THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA

My Commission Expires
Sept 3, 1945

VIOLA PETTIS

 COMPLAINANT

 VS.
 ZYLE ELBERT PETTIS

 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, TESTIMONY OF COMPLAINANT'S WITNESSES

and in behalf of Defendant upon _____

R. D. [Signature] Register.

..... VIOLA PETTIS
Complainant,
VS.
..... ZYLE ELBERT PETTIS
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:.....

..... Viola Pettis

..... Zyle Elbert Pettis

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

BEEBE & HALL

By
Solicitor for Complainant.

NOTE:

Complainant suggests the name of Bernice S. Reid

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

BEEBE & HALL

By
Solicitor for Complainant.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA- GREETINGS:

WE COMMAND YOU, that you summon ZYLE ELBERT PETTIS 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 VIOLA PETTIS against the said ZYLE ELBERT PETTIS 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 thereon, to our said Court immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court this the _____
day of March, 1944.

Register.

VIOLA PETTIS)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
VS)	BALDWIN COUNTY, ALABAMA
ZYLE ELBERT PETTIS)	IN EQUITY.
RESPONDENT)	

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

Now comes your Complainant, VIOLA PETTIS, and humbly complaining against the Respondent, Zyle Elbert Pettis, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant are bona fide residents of Baldwin County, Alabama, and are both over the age of twenty one years;

2.

That they were married at Bay Minette, Baldwin County, Alabama, on December 20th, 1941, and lived together as husband and wife in Baldwin County, Alabama, until December 29th, 1943;

3.

That on, to-wit, December 29th, 1943, and at various times prior thereto

the Respondent threatened and abused the Complainant and often threatened to do violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give the complainant every reasonable apprehension to believe, and she did actually believe, that the Respondent would carry out his threats and do violence to her person which would necessarily endanger her life and health.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Zyle Elbert 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.

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 _____
Solicitors for Complainant.

THE STATE OF ALABAMA }
Baldwin County }

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

VIOLA PETTIS

COMPLAINANT

VS.

ZYLE ELBERT PETTIS

RESPONDENT

I, Bernice S. Reid

as Register and Commissioner

have called and caused to come before me Viola Pettis and Georgia Graham

witnesses named in the Requirement for Oral Examination, on the 2nd day of March
19 44, 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 Viola Pettis

doth depose and say as follows:

My name is Viola Pettis. I am a bona fide resident of Baldwin County, Alabama, and over twenty one years of age.

The Respondent, Zyle Elbert Pettis is over twenty one years of age and a bona fide resident of Baldwin County, Alabama. The Respondent and I were married at Bay Minette, in Baldwin County, Alabama, on the 20th day of December, 1941. We lived together in Baldwin County, Alabama, until December 29th, 1943.

The Respondent on December 29th, 1943, and at various times prior thereto, threatened and abused me, and often threatened to do violence to my person which would necessarily endanger my life and health.

The conduct of the Respondent was such as to give me every reasonable apprehension to believe, and did actually believe, that if I lived with him as his wife he would carry out his threats and do violence to my person which would necessarily endanger my life and health.

We have no children; neither of us has any property.

I am fully convinced from the conduct of the Respondent toward me that it is absolutely impossible for us to live together as husband and wife.

Viola Pettis

Georgia Graham, a witness for the Complainant, being first duly sworn, deposes and says: My name is Georgia Graham, I live at Bay Minette, in Baldwin County, Alabama. I am personally acquainted with the Complainant and the Respondent in the above styled cause. The Complainant and Respondent married at Bay Minette, Alabama, on December 20th, 1941. I was around them quite a bit of time while they lived together as husband and wife at Bay Minette, until December 29th, 1943, when they finally separated.

I have often heard the Respondent threaten and abuse the Complainant

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Index no. 21444
P. H. Brock
by

NO. 1075

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

VIOLA PETTIS

Complainant
vs.

ZYLE EIBERT PETTIS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

RECORDED
RECORDED

No. 1075

RECORDED

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

VIOLA PETTIS

COMPLAINANT

VS.

ZYLE ELBERT PETTIS

RESPONDENT

NOTE OF TESTIMONY

Filed in Open Court this 2nd

day of March 1944

[Signature]

Register.

1075 ~

BT-6-46-500

DEMAND FOR ORAL EXAMINATION.

VIOLA PETTIS
Complainant,

Vs.

ZYLE ELBERT PETTIS
Respondent.

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

Filed this 22 day of March,

1947...

W. Duval
Register.

1075-

VIOLA PETTIS
RECORDED

VS

ZYLE ELBERT PETTIS

RESPONDENT

SUMMONS AND COMPLAINT.

Filed Mar 3 1944
J. H. Dwyer
Ref

ORAL EXAMINATION

I, Bernice S. Reid, 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— 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— or had proof 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 2nd day of March, 1944.

Bernice S. Reid (L. S.)

No. 10787 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY
Viola Pette

Complainant
Vs.
Zyla Elbert Pette

Respondent

ORAL DEPOSITION

Filed 3-2, 1944

Register
RECORDED IN _____
Record

Vol. _____ Page _____
Reid
Register