

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA --- GREETING:

WE COMMAND YOU, that you summon WILL REED 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 MINNIE REED against the said WILL REED 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  
\_\_\_\_\_ day of April, 1944.

\_\_\_\_\_  
Register.

. . . . .

MINNIE REED  
COMPLAINANT  
  
VS.  
  
WILL REED  
DEFENDANT

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

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

Now comes your Complainant, MINNIE REED, and humbly complaining against the Defendant, WILL REED, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Defendant are both 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, Alabama, on the 8th day of April, 1944, and lived together as husband and wife at Perdido, in Baldwin County, Alabama, until April 22, 1944;

3.

That prior to their marriage the Defendant had appeared to be kind and considerate but within the week after their marriage he began to stay out late at nights and to come home in a drunken and enraged

condition and cursed and abused her and called her all manner of indecent names and was cruel and inhuman toward this Complainant and threatened to beat her. Complainant from his conduct has reasonable cause to believe and does believe that should she continue to live with him he would do her bodily harm attendant with danger to her life or health. Because of such threats she separated from him on April 22, 1944 and they have not lived together since. Such acts of cruelty and such separation occurred in Baldwin County, Alabama.

Wherefore, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Will Reed, party Defendant, 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 Defendant, and that your Honor will give and grant unto her such other, further or different relief as she may in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

By

*W. C. Beebe*  
Solicitors for Complainant



1104

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

Minnie Reed Complainant

VS

Will Reed Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decrees Pro Confesso~~  
on Answer of Defendant 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 here-  
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,  
and that the said Minnie Reed  
is forever divorced from the said

Will Reed  
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 Minnie Reed  
be, and she hereby permitted to again contract marriage upon the payment of the cost of  
this suit.

It is further ordered that Defendant, Will Reed,  
~~may~~ pay the cost herein to be taxed, for which execution may issue.

This 26 day of April, 1944.

[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. 104 Page 1

**The State Of Alabama**

Baldwin County

In Circuit Court, In Equity

.....  
vs. Complainant.  
.....

.....  
Respondent.  
.....

**DIVORCE DECREEE**

.....Minnie Reed.....  
Complainant,  
VS.  
.....Will Reed.....  
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:.....Minnie Reed,.....  
.....  
.....  
.....;

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

BEEBE & HALL  
By: *W. C. Beebe*  
.....  
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: *W. C. Beebe*  
.....  
Solicitor 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 Minnie Reed

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

Minnie Reed Complainant

and Will Reed

Defendant,

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

Witness 25 day of April 1944

[Signature]

REGISTER

COMMISSIONER'S FEE, \$ \_\_\_\_\_

WITNESS' FEES, \$ \_\_\_\_\_

NO. 1104

The State of Alabama  
BALDWIN COUNTY  
CIRCUIT COURT

Minnie Reed

Complainant

vs.

Will Reed

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Virginia Trull

WITNESSES:

Minnie Reed



DEMAND FOR ORAL EXAMINATION.

*Minnie Reed*  
Complainant,

*Will Reed*  
Vs.  
Respondent.

\_\_\_\_\_

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

Filed this *25* day of *April*

194*X*.....

*W. Reed*  
Register.

1104 RECORDED

Mammie Reed

NR

Will Reed

Answer & Waived

Filed April 24, 1944

Reuben  
Reger

1104

Minnie Reed

RECORDED

Price Paid

Price of Complaint

Filed April 24 1884

Richard  
regester

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA --- GREETING:

WE COMMAND YOU, that you summon WILL REED 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 MINNIE REED against the said WILL REED 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 \_\_\_\_\_ day of April, 1944.

\_\_\_\_\_  
Register.

. . . . .

MINNIE REED  
COMPLAINANT

VS.

WILL REED  
DEFENDANT

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

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

Now comes your Complainant, MINNIE REED, and humbly complaining against the Defendant, WILL REED, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Defendant are both 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, Alabama, on the 8th day of April, 1944, and lived together as husband and wife at Perdido, in Baldwin County, Alabama, until April 22, 1944;

3.

That prior to their marriage the Defendant had appeared to be kind and considerate but within the week after their marriage he began to stay out late at nights and to come home in a drunken and enraged

\_\_\_\_\_

\_\_\_\_\_

Minnie Reed

VS.

Will Reed

\_\_\_\_\_

\_\_\_\_\_

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, Testimony of Complainant's witnesses

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Robert Register.

RECORDED

No.

1104

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

*Minorie Reed*

VS.

*Will Reed*

NOTE OF TESTIMONY

Filed in Open Court this *26*  
day of *April* 194*4*

*[Signature]*

Register.

THE STATE OF ALABAMA  
Baldwin County

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

Minnie Reed COMPLAINANT

VS.

Will Reed RESPONDENT

I, Virginia Keel

as ~~Register and~~ Commissioner

have called and caused to come before me

Minnie Reed

witness 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 witness to speak the truth,

the whole truth, and nothing but the truth, the said \_\_\_\_\_

Minnie Reed doth depose and say as follows:

My name is Minnie Reed. I am the wife of Will Reed. We were married at Bay Minette April 8, 1944. I have known him approximately four years. We are both over the age of twenty-one years and live at Perdido, in Baldwin County, Alabama. That without the knowledge of this Complainant the said Will Reed was a habitual drunkard and while drunk is of violent and dangerous temperament. That since our marriage on three or four different occasions he has stayed out all night or nearly all night drinking and come home in a drunken condition and cursed, and abused me and threatened to beat me. He is a powerful man and should he attempt to execute his threats he would do me bodily harm attendant with danger to my life and health and I fear from his conduct and threats that should I continue to live with him he would do me bodily harm attendant to my life and health.

Minnie Reed

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 and read over to me and she signed the same in the presence of myself and W. C. Beebe 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 25 day of April, 1944.

Virginia Keel (L. S.)

No. 1104 Page \_\_\_\_\_

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

IN CIRCUIT COURT, IN EQUITY

Complainant \_\_\_\_\_

Vs. \_\_\_\_\_

Respondent \_\_\_\_\_

**ORAL DEPOSITION**

Filed April 26, 1944 Register

RECORDED IN \_\_\_\_\_ Record

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

Register \_\_\_\_\_