

MARY FRANCES DAVIS MYERS

vs.

AMOS MYERS

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____

answer & reply, testimony of witnesses, Mary Frances Davis Myers and

Ella Davis

and in behalf of Defendant upon _____

Annie J. Alcock

Register.

C. L. Thompson

No. 8348

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

MARY FRANCES DAVIS MOORS

VS.

MOORS MOORS

NOTE OF TESTIMONY

Filed in Open Court this _____

day of _____, 194

FILED
SEP 9

ALICE J. DUCK, Register

1954
Register.

Printed by the Baldwin Times

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

MARY FRANCES DAVIS MYERS

Complainant

VS.

AMOS MYERS

Respondent

I, Lyrleene Nixon

as Register and Commissioner

have called and caused to come before me Mary Frances Davis Myers and Ella Davis

witness named in the Requirement for Oral Examination, on the 6th day of July

1954, at the office of C. LeNain Thompson

in Bay Minette, Alabama, and having first sworn said Witness ss to speak the

truth, the whole truth, and nothing but the truth, the said Mary Frances Davis Myers and

Ella Davis doth depose and say as follows:

That my name is Mary Frances Davis Myers, I am over the age of 18 and a resident of Baldwin County, Alabama, and have been more than two years next preceding, the Respondent is over the age of 21 and is presently residing at Anacoco, Louisiana, we were married in Anacoco, Louisiana, on December 14, 1951, and lived together until May 4, 1954, as husband and wife, though we separated on a number of occasions prior to this date because of drinking on the part of the Respondent and the brutal treatment given me, which at times he used his fist in striking me. On the last separation when he beat on me with his fist and because of the threats he made I became in fear of my life and health and was forced to leave him. I know of no cause I gave him for such treatment. There are no children as fruits of this marriage and no property to be divided. I respectfully ask the court for a divorce and for the right to resume the use of my maiden name, Mary Frances Davis.

Mary Frances Davis Myers.

My name is Ella Davis, I know both parties to this cause the Complainant is over the age of 18 and a resident of Baldwin County, Alabama, where we have lived more than two years next preceding, the Respondent is over the age of 21 and presently residing at Anacoco, Louisiana, the Complainant is my daughter and she has come home to me many times because of beatings given her by the Respondent, the last time being about the 4th of May, 1954, when she came in having left him because he struck her about her body with his fist and treated her that she was in fear of her life or health and I do not believe that they will ever live together again as husband and wife and there are no children as fruits of this marriage and no property to be divided.

Ella Davis

ORAL EXAMINATION

I, Lynne Miron, as Register and Commissioner hereby certify that the foregoing deposition S on Oral Examination was taken down by me in writing in the words of the witness SS and read over to them and they signed the same in the presence of myself and C. LeKoir Thomson

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness SS or had proom made before me of the identity of said witness SS; 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 6th day of July, 19 54

Lynne Miron (L. S.)

No. _____	Page _____
The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
MARY PROMOS DAVIS IYERS	
vs.	Complainant
ANOS IYERS	
	Respondent
Oral Deposition	
Filed _____, 19 _____	
FILED	
SEP Recorded in	
1954	
ALICE J. PARK, Register	
Vol. _____	Page _____
Record	
_____, Register	

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Lyndean Nixon

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 Mary Frances Davis Myers and Ella Davis

as witnesses in behalf of Mary Frances Davis Myers in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

Mary Frances Davis Myers

_____, Complainant
and Amos Myers

_____, Respondent

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

Witness 6th day of July, 195 4.

Archie Freeman
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

IN THE CIRCUIT COURT OF

DAKIN COUNTY, ALABAMA

IN EQUITY

MARY FRANCES DAVIS MYERS,

COMPLAINANT,

VS

AMOS MYERS,

RESPONDENT.

Answer & Waiver

C. LeMoire Thompson
Attorney At Law
Bay Minette, Alabama.

FILED

SEP 9 1954

ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby to summon Amos Myers to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Mary Frances Davis Myers as Complainant and against Amos Myers, as Respondent.

Witness my hand this the _____ day of July, 1954.

Clerk.

MARY FRANCES DAVIS MYERS,	1	
	1	IN THE CIRCUIT COURT OF
COMPLAINANT,	1	BALDWIN COUNTY, ALABAMA
VS	1	IN EQUITY
AMOS MYERS,	1	
RESPONDENT.	1	

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

Your Complainant, Mary Frances Davis Myers, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That the Complainant is a bona fide resident of Baldwin County, Alabama, and has been more than two years next preceding, the Respondent is presently residing in Anacoco, Louisiana, The Complainant is over the age of 18 years and the Respondent is over the age of 21 years of age.

2.

That your Complainant and the Respondent married at Anacoco, Louisiana, on December 11, 1951, and lived together as husband and wife until on, to-wit, May 4, 1954.

3.

That on, to-wit May 4, 1954, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. 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 actual violence to her person, which would necessarily endanger her life or health.

4.

That the Complainant and the Respondent have no children as fruits of this marriage, and there is no property to be divided.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said James Myers, party Respondent to this cause of action, 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 hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent, and will grant the Complainant the right to resume the use of her former name, Mary Frances Davis, that she be granted such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Solicitor for the Complainant.

3346

IN THE CIRCUIT COURT OF
DAWSON COUNTY, ALABAMA
IN EQUITY

MARY FRANCES DAVIS MYERS,
COMPLAINANT,
VS
AMOS MYERS,
RESPONDENT.

Bill of Complaint.

C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

FILED

SEP 9 1954

ALICE J. DUCK, Register

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

MARY FRANCES DAVIS MYERS, Complainant

vs.

MRS. MYERS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Answer & Waiver 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

Mary Frances Davis Myers is forever divorced from the said Mrs. Myers for and on account of

Cruelty

It is further ordered, adjudged and decreed by the Court that the Complainant be and she is hereby given the right to resume the use of her maiden name, Mary Frances Davis.

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 Mary Frances Davis Myers the Complainant pay the cost herein to be taxed, for which execution may issue.

This 9th day of September, 1954

Hubert M. Tice

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. 3348

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THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

MARY ELLIEN DAVIS LYONS

Complainant

vs.

ALON LYONS

Respondent

DIVORCE DECREE

FILED
SEP 10 1954
ALICE L. DICK, Register