

1192

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

MINNIE CLEMMONS

Complainant

VS

I. N. CLEMMONS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decrees Pro Confesso~~ answer and waiver of Respondent on \_\_\_\_\_ 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,

MINNIE CLEMMONS

and that the said \_\_\_\_\_

is forever divorced from the said

I. N. CLEMMONS

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 CLEMMONS AND I. N. CLEMMONS

be, and <sup>they</sup> \_\_\_\_\_ hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Minnie Clemmons

the Complainant \_\_\_\_\_ pay the cost herein to be taxed, for which execution may issue.

This 21<sup>st</sup> day of September, 19 44.

*[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. 1193 Page .....

**The State Of Alabama**

Baldwin County

In Circuit Court, In Equity

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

.....  
Respondent.....

**DIVORCE DECREE**

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT

TO V. A. Price

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 Clemmons and Verna Cross

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

Complainant  
and I. N. Clemmons

Defendant,  
on oath to be by you administered, upon Minnie Clemmons and Verna Cross

to take and certify the deposition<sup>s</sup> of the witness<sup>es</sup> and return the same to our Court, with all convenient speed, under your hand.

Witness 18th day of September, 1944

*R. S. Luck*  
REGISTER

Commissioner's Fee \$

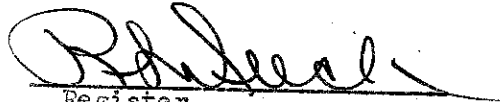
Witness' Fees, \$

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA-- GREETINGS;

We Command You, that you summon I. N. CLEMMONS to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty 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 CLEMMONS, against the said I. N. CLEMMONS and further to do and perform what the said Judge shall order and direct in the behalf, and this the Respondent shall in no wise omit, under penalty of the law. 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 the said Circuit Court  
this the 6th day of September, 1944.

  
Register

MINNIE CLEMMONS,  
COMPLAINANT  
VS  
I. N. CLEMMONS,  
RESPONDENT

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

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

Now comes your Complainant MINNIE CLEMMONS and humbly com-  
plaining against the Respondent, I. N. CLEMMONS, respectfully represents and  
shows unto your Honor and this Honorable Court as follows:

1

That the Complainant and the Respondent are bona fide resi-  
dents of Baldwin County, Alabama, and over twenty-one years of age; that they  
have been such residents for more than three years next preceding the filing  
of this bill of complaint.

2

That your Complainant and the Respondent married at Defuniak  
Springs, Florida, in May 1926, and lived together as husband and wife until,  
to-wit: in May 1944.

That the Respondent at various times while they lived together as husband and wife cursed, threatened and abused the Complainant, and often threatened to do violence to the person of the Complainant, and on several occasions did actual violence to her by striking her, which necessarily endangered 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 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.

WHEREFORE the premises considered, Your Complainant prays that your Honor will by proper process make the said I. N. CLEMMONS party respondent to this bill of complaint, requiring him to plead, answer or demur to the same within the time and under the penalties of law, and the practice of this Honorable Court.

Your Complainant further prays that upon a final hearing hereof your Honor will give and grant unto your Complainant a decree of divorce forever barring the bonds of matrimony existing between her and the Respondent; that you Honor will give and grant unto her such other, further, different or general relief as she may in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBEG HALL

BY 

Solicitors for the Complainant.

Minnie Clemmons,  
Complainant,  
vs  
I. N. Clemmons,  
Respondent

In The Circuit Court of  
Baldwin County, Alabama,  
In Equity

And now comes the Respondent and for answer to the Complainant's Bill of Complaint and to each allegation therein contained says:

He denies each and every allegation contained in the bill of complaint and demands strict proof of the same.

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 agrees that this cause be submitted forthwith for final decree without further notice.

Witnesses:

*[Handwritten signature]*

*I. N. Clemmons*  
Respondent

1195

Minnie Clemmons  
is

J. N. Clemmons

Answers to questions

7 recd

9-19-44

R.S. Muehl  
Ray

~~1192~~  
1192

Served 9-11 1944  
by serving copy of within Summons and  
Complaint on

I. N. Clemons

MINNIE CLEMONS,

VS

I. N. CLEMONS.

W.R. Stewart Sheriff  
BY Th. S. by Nell Deputy Sheriff

SUMMONS AND COMPLAINT

Filed for file 1944  
W.R. Stewart  
Deputy



The State of Alabama,  
Baldwin County.

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

MINNIE CLEMMONS

Complainant.

VS.

I. N. CLEMMONS

Respondent.

I, V. A. Price

as Register and Commissioner

have called and caused to come before me Minnie Clemmons and Verna Gross

witness named in the Requirement for Oral Examination, on the 18th day of September 1944  
192, 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 Clemmons

doth depose and say as follows:

My name is Minnie Clemmons. I am a bona fide resident of Baldwin County, Alabama, and am over twenty-one years of age. I have been a bona fide resident of Baldwin County, Alabama, for more than three years next preceding the filing of the bill of complaint in this cause.

The Respondent and I married at Defuniak Springs, Florida, in May 1926, and we lived together as husband and wife until in May 1944.

The Respondent in May 1944 and at various other time prior thereto cursed, threatened and abused me and on several occasions did actual violence to my person, which necessarily endangered my life and health. 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 violence to me person which would necessarily endanger my life and health.

the conditions and the conduct of the Respondent is such that I know that it is absolutely impossible for us to ever again live together.

*Minnie Clemmons*

Verna Gross, a witness for the Complainant, being first duly sworn says:

My name is Verna Gross. I live at Bay Minette, Baldwin County, Alabama.

I am personally acquainted with the Complainant and the Respondent in this cause, and have had occasion to around and near them quite often. I have often heard the Respondent curse, threaten and abuse the Complainant. I know of my own personal

ORAL EXAMINATION.

I, V. A. Price, as Register and Commissioner hereby certify that the foregoing deposition<sup>s</sup> on Oral Examination was taken down in writing by me in the words of the witness<sup>es</sup> and read over to them and they signed the same in the presence of myself H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness<sup>es</sup> or had proof made before me of the identity of said witness<sup>es</sup>; 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 18 day of September 1944

V. A. Price (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

**Oral Deposition**

Filed 9-19 1944

R. S. Dineen Register.

Recorded in \_\_\_\_\_ Record

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

Register

knowledge that the conduct of the Respondent is such as to give the Complainant every reasonable apprehension to believe, and I know that she does actually believe that she is afraid that if she continues to live with the Respondent he will carry out his threats and do actual violence to her person, which will necessarily endanger her life and health.

Vernie M. Gross

STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. \_\_\_\_\_ Term, 194\_\_\_\_\_

Minnie Clemmons

, Complainant

Vs.

I. N. Clemmons

, Defendant

To Hon. R. S. Duck \_\_\_\_\_, Register

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Beebe & Hall

\_\_\_\_\_ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vaca-

**The State of Alabama,**

Baldwin County

**CIRCUIT COURT, IN EQUITY**

Vs.

**REQUEST FOR DECREE IN  
VACATION**

Filed 9-19<sup>th</sup>, 1944

R. S. Duck  
Register.

Recorded in \_\_\_\_\_ Record

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Register.

Minnie Clemmons

THE STATE OF ALABAMA,  
BALDWIN COUNTY

VS.

I. N. Clemmons

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 the Respondent and testimony of Minnie Clemmons and  
Verna Gross

and in behalf of Defendant upon

*R.S. Dush*

Register.

No. \_\_\_\_\_

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

VS.

NOTE OF TESTIMONY

Filed in Open Court this 19<sup>th</sup>

day of Sept 1944

R. S. Ulrich  
Register.