


as his wife and lived with him as his wife in an apartment rented to them by Mrs. C. C. Page at New Llano, Louisiana; that this occurred between the dates of June 4, 1944 and July 9, 1944 while the Complainant was overseas; that such acts of adultery were committed without the knowledge or consent of your complainant and he has not lived with her as man and wife since such acts were committed.

PRAYER FOR PROCESS AND RELIEF.

The premises considered your Complainant prays that your Honor will cause the usual writ of process to issue to the said Iona Hand making her a party defendant to this Bill of Complaint and requiring her to plead, answer or demur to the same within the time required by law and the rules of this Honorable Court; Your Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce forever dissolving the bonds of matrimony heretofore existing between the Complainant and the Respondent. Should your Complainant be mistaken in the relief prayed for that there be granted to him such other, further and different relief as in Equity may seem just and meet and your Complainant will ever pray.


Solicitors for Complainant.

JAMES DAVID HAND,
 Complainant,
 VS.
 IONA HAND,
 Defendant.

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

Deposition of Clifford Garrison, a witnesssworn
 on the 18th day of September, 1944, at Leesville, Louisiana,
 in Vernon Parish, Louisiana, under and by virtue of a
 Commission issued out of the Circuit Court of Baldwin County, Ala-
 bama, in Equity, in a certain cause therein pending between James
 David Hand, as Complainant, and Iona Hand, as Respondent. The
 said Clifford Garrison being duly sworn to say the truth, the whole
 truth and nothing but the truth, doth depose and say as follows:-

To the First Interrogatory he saith:

Clifford Garrison is my name, I am 25 years of age, reside at Murray,
 Kentucky, and am stationed at Camp Polk, Louisiana.

To the Second Interrogatory he saith:

Yes, I am personally acquainted with Iona Hand, and I did know her from
 June 4, 1944, to July 9, 1944.

To the Third Interrogatory he saith:

Yes, Iona Hand did live with me as my wife at New Llano, Louisiana,
 in an apartment rented from Mrs. C. C. Page between June 4, 1944,
 and July 9, 1944. Iona Hand did sign the register at this apartment
 house as my wife.

I met Iona Hand in the latter part of 1942 at Mobile, Alabama, and I
 did live with her at various places as husband and wife. I saw her
 for the last time on July 8, 1944. We were intimate numerous times
 during our acquaintance and up to July 8, 1944.

To the Fourth Interrogatory he saith:

Iona Hand did abandon me on July 8, 1944, at or near Leesville,
 Louisiana.

Clifford Garrison

STATE OF LOUISIANA,

PARISH OF VERNON,

I, the undersigned Commissioner named in said
 Commission hereby certify that I am personally acquainted with the
 said witness, Clifford Garrison, and know him to be the identical

person named in said Commission; that he was sworn and examined as above stated and that his evidence was taken down by me as near as might be in his own language and was subscribed by him in my presence on this the 18th day of September, 1944, at the place above stated.

Sh. L. Shady

Commissioner.

STATE OF LOUISIANA,

PARISH OF VERNON,

I, Sh. L. Shady, Commissioner named in the aforementioned Commission, hereby certify that I am not of counsel or of kin to any of the parties to this cause, nor in any manner interested in the results thereof.

WITNESS my hand and seal this 18th day of September, 1944.

Sh. L. Shady

Commissioner.

THE STATE OF ALABAMA, }
Baldwin County }

CIRCUIT COURT

TO ERIN S. MONTGOMERY:

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

Charles C. Hand

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

James David Hand

Complainant

and

Iona Hand

Defendant,

on oath to be by you administered, upon Charles C. Hand

to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 19th day of September, 1944.

R.S. Funch

REGISTER

Commissioner's Fee \$

Witness' Fees, \$

JAMES DAVID HAND,
Complainant,

Vs.

IONA HAND,
Defendant.

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

Deposition of Mrs. C. C. Page, a witness sworn
on the 18th day of September, 1944, at Leesville, Louisiana
in Vernon Parish, Louisiana, under and by virtue of
a Commission issued out of the Circuit Court of Baldwin County,
Alabama, in Equity, in a certain cause therein pending between
James David Hand, as Complainant, and Iona Hand, as Respondent.
The said Mrs. C. C. Page first being duly sworn to say the truth,
the whole truth and nothing but the truth, doth depose and say as
follows:-

To the First Interrogatory she saith:

Mrs. C. C. Page, New Llano, Louisiana, I am 45 years of age.

To the Second Interrogatory she saith:

Yes, I am acquainted with Clifford Garrison. He and a woman who he
introduced to me as his wife rented an apartment from me from June 4,
1944, to July 9, 1944. The woman with Clifford Garrison signed the
register as the wife of Clifford Garrison.

To the Third Interrogatory she saith:

Yes, I did rent an apartment at New Llano, Louisiana, to Clifford
Garrison and a woman who represented herself to be his wife. The woman
signed the register as the wife of Clifford Garrison. As far as I know
Clifford Garrison and this woman lived together as man and wife from
June 4, 1944, through July 9, 1944, and they did occupy the same bed room
as far as I know.

STATE OF LOUISIANA,

PARISH OF VERNON

Mrs C C Page

I, the undersigned Commissioner named in said

Commission hereby certify that I am personally acquainted with the said Witness, Mrs. C. C. Page, and know her to be the identical person named in said Commission; that she was sworn and examined as above stated and that her evidence was taken down by me as near as might be in her own language and was subscribed by her in my presence on this the 18th day of September, 1944, at the place above stated.

Thb. Shady
Commissioner.

STATE OF LOUISIANA,
PARISH OF VERNON,

I, Thb. Shady, Commissioner named in the foregoing mentioned Commission, hereby certify that I am not of counsel or of kin to any of the parties to this cause, nor in any manner interested in the results thereof.

WITNESS my hand and seal this 18th day of September, 1944.

Thb. Shady
Commissioner.

JAMES DAVID HAND,
Complainant,

VS.

IONA HAND,
Defendant.

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

Comes the Defendant in the above styled cause
and for answer to the Complaint filed in said cause, says:-

FIRST:

She denies the allegations of the complaint and
demands strict proof thereof.

Defendant waives notice of the taking of the
testimony in said cause and notice of submission of the same,
and agrees that such testimony may be taken and the cause
submitted as soon as the Complainant desires to do so without
further notice to her.

Iona Hand
Defendant.

WITNESS:

M. H. Lawrence
C. J. Smith

THE STATE OF ALABAMA, }
Baldwin County

CIRCUIT COURT

TO W. C. WOOD

Attorney at Law, First National Bank Building,

Leesville, Louisiana.

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

Clifford Garrison

and

Mrs. C. C. Page

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

James David Hand

Complainant

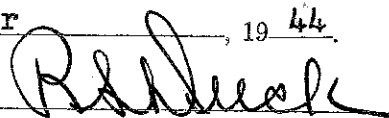
and

Iona Hand

Defendant,

on oath to be by you administered, upon Interrogatories Annexed annexed to this Commission to take and certify the deposition^s of the witness^{es} and return the same to our Court, with all Convenient speed, under your hand.

Witness 15th day of September, 19 44



REGISTER

Commissioner's Fee \$

Witness' Fees, \$

5611

No. Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

JAMES DAVID HAND,

vs. Complainant.

TONA HAND,

Respondent.

DIVORCE DECREE

NO. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JAMES DAVID HAND,

Complainant

VS.

TONA HAND,

Defendant

Commission To Take Deposition

COMMISSIONER:

ERIN S. MONTGOMERY

Witnesses:

Charles C. Hand

ANSWERS TO INTERROGATORIES
AND CERTIFICATE OF COMMISSIONER

JAMES DAVID HAND,

Complainant

VS.

IONA HAND,

Respondent.

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

FILED SEPTEMBER 19, 1944.

J.S. Pluck
Register.

NO. _____

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

JAMES DAVID HAND,

Complainant

VS.

TONA HAND,

Defendant

Commission To Take Deposition

COMMISSIONER:

Witnesses:

1145 -

Hand

D.

Hand

Hand
Sept 14 1944
R. J. [unclear]
[unclear]

ANSWER TO INTERROGATORIES
AND CERTIFICATE OF COMMISSIONER

JAMES DAVID HAND,

Complainant,

VS.

IONA HAND,

Respondent.

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

FILED SEPTEMBER 19, 1944.

R.S. Wicks
Register.

COMMISSION AND INTERROGATORIES

JAMES DAVID HAND,

Complainant,

VS.

IONA HAND,

Respondent.

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

FILED SEPTEMBER 15, 1944.

W. S. Wicks
Register.

BILL OF COMPLAINT.

1190

were committed.

JAMES DAVID HAND, Complainant.

Complainant.

IONNA HAND, Defendant.

Defendant.

VS. PRAYER FOR PROCESS AND RELIEF IN EQUITY. IN THE CIRCUIT COURT OF BARDWELL COUNTY, ALABAMA.

FILED SEPTEMBER 14, 1944.

Register.

and he has not lived with her as man and wife since such acts committed without the knowledge or consent of your complainant the Complainant was overreached; that such acts of adultery were occurred between the dates of June 4, 1944 and July 9, 1944 while to them by Mrs. C. C. Page at New Llano, Louisiana; that this as his wife and lived with him as his wife in an apartment rented

will ever pray. relief as in Equity may seem just and meet and your Complainant that there be granted to him such other, further and different should your Complainant be mistaken in the relief prayed for heretofore existing between the Complainant and the Respondent. an absolute divorce forever dissolving the bonds of matrimony of this cause that your Honor will grant unto your Complainant Court; Your Complainant further prays that upon a final hearing within the time required by law and the rules of this Honorable Complainant and requiring her to lead, answer or demur to the same the said Complainant making her a party defendant to this Bill of that your Honor will cause the said writ of habeas corpus to issue to The premises considered your Complainant prays

Solicitors for Complainant.

as his wife and lived with him as his wife in an apartment rented to them by Mrs. C. C. Page at New Llano, Louisiana; that this occurred between the dates of June 4, 1944 and July 9, 1944 while the Complainant was overseas; that such acts of adultery were committed without the knowledge or consent of your complainant and he has not lived with her as man and wife since such acts were committed.

AS PRAYER FOR PROCESS AND RELIEF

The premises considered your Complainant prays that your Honor will cause the usual writ of process to issue to the said Respondent making her a party defendant to this Bill of Complaint and requiring her to plead, answer or demur to the same within the time required by law and the rules of this Honorable Court; Your Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce forever dissolving the bonds of matrimony heretofore existing between the Complainant and the Respondent. Should your Complainant be mistaken in the relief prayed for that there be granted to him such other, further and different relief as in Equity may seem just and meet and your Complainant will ever pray.

By Paul A. Rouse
Solicitors for Complainant.

BILL OF COMPLAINANT

TO THE HONORABLE THE COURT OF THE DISTRICT OF LOUISIANA
IN THE MATTER OF THE BILL OF COMPLAINANT
AND RESPONDENT
AND PRAYER FOR PROCESS AND RELIEF

1102

JAMES DAVID HAND,
Complainant,
VS.
IONA HAND,
Defendant.

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

TO THE HON. F. W. HARE, JUDGE OF THE 21ST JUDICIAL CIRCUIT

Comes your Complainant James David Hand humbly complaining of the Defendant Iona Hand in a matter of divorce as will hereinafter appear and shows unto your Honor and unto this Court as follows:-

FIRST:

That the Complainant is twenty-three years of age and is a resident citizen of Bay Minette in Baldwin County, Alabama, and has resided here all of his life; that the Defendant is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama, residing at Bay Minette.

SECOND:

That your Complainant and the Respondent were married on heretofore to-wit, September 5, 1941 and lived together as man and wife until on account of the matters hereinafter complained of he was compelled to bring this suit; that your Complainant was a member of the Armed Forces of the United States at the time the he married the Respondent, and he and the Respondent lived together near the camp at which he was stationed until he was sent overseas.

THIRD:

That since your Complainant has been overseas he has learned that the Respondent has committed acts of adultery with Clifford S. Garrison, a soldier who is assigned to the 919th Heavy Ordnance Maintenance Company and is now stationed at Camp Polk, Louisiana; that the said Respondent committed various acts of adultery with the said Clifford S. Garrison; that she registered

THE STATE OF ALABAMA }
Baldwin County }

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

JAMES DAVID HAND, COMPLAINANT

vs.

IONA HAND, RESPONDENT

I, ERIN S. MONTGOMERY

as ~~Registered~~ Commissioner

have called and caused to come before me

Charles C. Hand

witness named in the requirement for Oral Examination, on the 19th day of September

1944, 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 Charles C. Hand

doth depose and say as follows:

I, ERIN S. MONTGOMERY 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 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 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 19th day of September 1944.

Erin S. Montgomery (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

JAMES DAVID HAND,

COMPLAINANT

vs.

IONA HAND,

RESPONDENT

ORAL DEPOSITION

Filed September 19, 1944.

P. S. Wacke, Register.

RECORDED IN _____ Record _____

Vol. _____ Page _____, Register _____

TESTIMONY OF CHARLES C. HAND.

My name is Charles C. Hand. I am 64 years of age and a resident citizen of Baldwin County, Alabama, residing at Bay Minette. I am the father of James David Hand who is the Complainant in that suit for divorce filed by him in the Circuit Court of Baldwin County, Alabama, in Equity, against Iona Hand as Defendant. I am personally acquainted with Iona Hand and have known her for several years. James David Hand is 23 years of age and a resident citizen of Bay Minette in Baldwin County, Alabama, and has resided here all of his life. Iona Hand is over the age of 21 years and is a resident citizen of Baldwin County, Alabama, residing in Bay Minette. James David Hand married Iona Hand on or about September 5, 1941 and they lived together as man and wife until on or about January 15, 1942. James David Hand was a member of the Armed Forces of the United States at the time he married the said Iona Hand. They lived together as man and wife near the Camp at which he was stationed until he was sent overseas about January 15, 1942. He has been overseas since that time and they have not lived together as man and wife since January 15, 1942. Iona Hand has admitted to me that she lived as man and wife with Clifford Garrison in an apartment rented to her and the said Clifford Garrison by Mrs. C. C. Page of New Llano, Louisiana on or about June 4, 1944 to July 9, 1944.

Charles C. Hand

JAMES DAVID HAND,

VS.

IONA HAN D,

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, Summons,
Waiver Filed by Defendant; Interrogatories Propounded to Mrs.
C. C. Page and Clifford Garrison; Answers to Interrogatories by
Mrs. C. C. Page and Clifford Garrison; Certificate of Commissioner,
taking testimony; and Testimony of Charles C. Hand

and in behalf of Defendant upon Answer and Waiver

R. S. [Signature] Register.
My part a Sharon
Solicitor for Comp.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. 1193

CIRCUIT COURT BALDWIN COUNTY

Sept

TERM, 1944

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You are hereby commanded to summon

Dora Ward

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

Dora Ward

~~Defendant~~
Plaintiff

by

Jane Dora Ward

Carpenter
Plaintiff

Witness my hand this

14

day of

Sept

1944

R. D. [Signature]

Clerk.

No. _____

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

JAMES DAVID HAND,

VS.

IONA HAND,

NOTE OF TESTIMONY

Filed in Open Court this 19th
day of September 1944.

R.S. Muck
Register.

LEESVILLE, LA.

September 18,

194 4

M.

IN ACCOUNT WITH
WOOD & WOOD
ATTORNEYS-AT-LAW
FIRST NATIONAL BANK BUILDING

To Professional Services

Sept. 18, 44

Depositions of Clifford Garrison and Mrs. C. C. Page
in matter entitled "James G. Hand vs. Iona Hand"

\$10.00

*Paid Sept 18, 1944
Mr. Wood*