

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

MARY C. WILLIAMS

, Complainant

vs.

ARTHUR WILLIAMS

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Answer and Waiver~~

Answer and 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 C. WILLIAMS

is forever divorced from the

said

ARTHUR WILLIAMS

for and on account of

"CRUELTY"

It is further ORDERED, ADJUDGED AND DECREED by the Court that the Agreement made and entered into by the parties hereto on the 12th day of September, 1955, be, and it is hereby, made a part of, and incorporated in, this decree and both parties are hereby ordered and directed to keep and abide by the terms of said agreement.

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 ARTHUR WILLIAMS

the Respondent pay the cost herein to be taxed, for which execution may issue.

This 26th day of September, 1955.

Hubert M. Hall

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. 3619 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

SEP 26 1955

ALICE J. DUCK, Register

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

MARY C. WILLIAMS

Complainant

VS.

ARTHUR WILLIAMS

Respondent

I, JAMES R. OWEN

as ~~XXXXXX~~ Commissioner heretofore appointed

have called and caused to come before me MARY C. WILLIAMS

witness named in the Requirement for Oral Examination, on the 26th day of September

1955, at the office of Telfair J. Mashburn, Jr.

in Bay Minette

, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said MARY C. WILLIAMS

doth depose and say as follows: "My names is MARY C. WILLIAMS.

I am the complainant in this cause and I am over the age of twenty-one years. I am a bona fide resident citizen of Baldwin County, Alabama, and I have lived in the State of Alabama for more than two years next preceding the filing of the bill of complaint in this cause. The respondent, ARTHUR WILLIAMS, is over the age of twenty-one years and is a bona fide resident citizen of Alabama, residing in Mobile, Alabama. I was married to the respondent at Pascagoula, Mississippi, on the 18th day of April, 1941. We got along fine for a long time, but then my husband seemed to get tired of me. He struck me on more than one occasion and threatened me numerous times. On one occasion, he got an ice pick after me. I am fully convinced, from the way he has treated me in the last few months, that, if I continue to live with him as his wife, he will do further physical violence to my person which would be dangerous to my life or health. I was finally forced to leave him because of his treatment of me. We have no children. We have reached an agreement as to the division of our property, which agreement I believe to be fair and just to both parties." Further Deponent says not.

Mary C. Williams

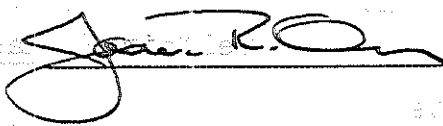
ORAL EXAMINATION

I, JAMES R. OWEN, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness and read over to her and she signed the same in the presence of myself

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 26th day of September, 1955

 (L. S.)

No. _____ Page _____

The State of Alabama
Baldwin County.

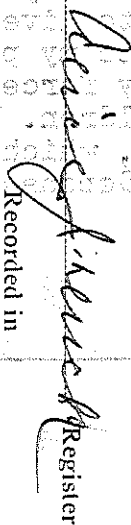
In Circuit Court, In Equity

vs. Complainant

Respondent

Oral Deposition

Filed 9-26, 1955


Recorded in _____
Register

Record

Page

Register

Complainant

VS.

ARTHUR WILLIAMS

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

Baldwin

Alabama, the place of trial of said cause, to-wit: MARY C. WILLIAMS

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

John J. MacLure
Solicitor for Complainant

NOTE:

Complainant suggests the name of JAMES R. OWEN

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

Jeffrey J. Maslowski
Solicitor for Complainant

DEMAND FOR ORAL EXAMINATION

MARY C. WILLIAMS

Complainant

vs.

ARTHUR WILLIAMS

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this 7th day of Sept

1951

Beie J. Smith Register
Moore Printing Co.

MARY C. WILLIAMS

vs.

ARTHUR WILLIAMS

THE STATE OF ALABAMA
Baldwin CountyIN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
Agreement between the parties, Answer and Waiver, and testimony
of MARY C. WILLIAMS.

and in behalf of Defendant upon Agreement between the parties and Answer and
Waiver.

*Superior J. Madhury, Jr.**Reinhold*

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

MARY C. WILLIAMS

vs.

ARTHUR WILLIAMS

NOTE OF TESTIMONY

Filed in Open Court this 26

day of Sept, 1943

Wm. J. French
Register.

Printed By The Baldwin Times

MARY C. WILLIAMS,
COMPLAINANT,
VS.

ARTHUR WILLIAMS,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

ANSWER AND WAIVER

Comes the respondent in the above styled cause and accepts of service of a bill/complaint; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree at any time, without further notice to him.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. He admits the allegations contained in paragraph 1 of said bill of complaint.
2. He admits the allegations contained in paragraph 2 of said bill of complaint.
3. He denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof of the same.

FILED

9-26 1953

ALICE J. BUCK, Register

Arthur Williams
RESPONDENT.

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MARY C. WILLIAMS

Complainant

VS.

ARTHUR WILLIAMS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

Subscribed and sworn to before me this 1st day of May 1964 at the County of Baldwin, State of Alabama.

MARY C. WILLIAMS

Subscribed and sworn to before me this 1st day of May 1964 at the County of Baldwin, State of Alabama.

MARY C. WILLIAMS

Subscribed

Commissioner

Subscribed

Witness

Subscribed and sworn to before me this 1st day of May 1964 at the County of Baldwin, State of Alabama.

Subscribed and sworn to before me this 1st day of May 1964 at the County of Baldwin, State of Alabama.

Subscribed and sworn to before me this 1st day of May 1964 at the County of Baldwin, State of Alabama.

MARY C. WILLIAMS,	0	IN THE CIRCUIT COURT OF
Complainant,	0	BALDWIN COUNTY, ALABAMA.
VS.	0	IN EQUITY. NO. _____
ARTHUR WILLIAMS,	0	
Respondent.	0	

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

Your complainant, MARY C. WILLIAMS, respectfully represents
and shows unto your Honor:

1. That complainant is over the age of twenty-one years and is
a resident of said State and County, and has been a bona fide resident
of said State for more than two years next preceding the filing of
this bill of complaint; that ARTHUR WILLIAMS is over the age of
twenty-one years and resides in Mobile County, Alabama.

2. That your complainant and the respondent were lawfully mar-
ried on or about, to-wit: the 18th day of April, 1941, at Pascagoula,
Mississippi.

3. Your complainant avers and charges that in the Fall of 1954,
and many times subsequent thereto, the respondent did assault, beat,
hit and strike complainant; that he attacked her with a ice pick;
that he has committed actual violence on her person attended with
danger to her health or life; and from his manner and conduct toward
her she is reasonably convinced that he will commit further actual
violence on her person, should she continue to live with him as his
wife, which would be dangerous to her life or health.

4. That there are no children as a result of this marriage.

5. That complainant and respondent have entered into an agreement
with reference to alimony and support, a copy of which is hereto at-
tached as Exhibit "A" and, by reference, made a part hereof. Com-
plainant avers that this is a reasonable and just agreement and prays
the Court in the event a decree of divorce is given in this cause
that the Court will decree that the parties keep and abide by the
terms of said agreement.

THE PREMISES CONSIDERED, your complainant makes the said ARTHUR
WILLIAMS a party respondent to this bill of complaint, and in order
that complainant may have the relief herein prayed for, may it please

your Honor to cause the State's writ of subpoena to be issued, directed to the said ARTHUR WILLIAMS, commanding him to answer, plead or demur to this bill of complaint within the time required by law. Your complainant prays that, on a final hearing of this cause, your Honor will make and enter a decree divorcing your complainant from the respondent, granting the complainant the right to remarry should she so desire, and ordering both the respondent and your complainant to keep and abide by the terms of the agreement attached hereto as Exhibit "A"; and your complainant prays for such other, further, different or general relief as unto your Honor may seem just and proper, and, as in duty bound, your complainant will ever pray, etc.

Jessie S. Madbury Jr.
SOLICITOR FOR COMPLAINANT.

EXHIBIT "A"

STATE OF ALABAMA, 0
COUNTY OF BALDWIN. 0

BOOK 018 PAGE 298

This agreement, made and entered into on this the 17 day of September, by and between ARTHUR WILLIAMS, hereinafter referred to as the "husband", and MARY C. WILLIAMS, hereinafter referred to as the "wife", WITNESSETH:

WHEREAS, the parties hereto are husband and wife, having intermarried at Pascagoula, Mississippi, on or about the 18th day of April, 1941; and,

WHEREAS, said parties have definitely concluded that under conditions now existing it is impracticable for them to live together as man and wife;

NOW, THEREFORE, in consideration thereof, and of the mutual agreements hereinafter made, they have mutually agreed to a complete separation under the following express terms and conditions:

1. The said parties shall entirely and completely separate as man and wife, live separate and apart, and neither party hereafter shall in any way harass, threaten, intimidate, or otherwise act in any way so as to embarrass or humiliate the other party.

2. The husband agrees to convey to the wife all of his right, title and interest in and to their home at Silverhill, in Baldwin County, Alabama, more particularly described as follows:

The east half of the northwest
quarter of the northwest quarter
of Section 9, Township 6 South,
Range 3 East,

including the household furniture and four head of cattle; it being understood and agreed that in consideration of the conveyance as aforesaid, he shall be, and hereby is, released from any further obligation of any kind or character by way of alimony, support or maintenance, court decree or otherwise, to contribute toward the support or maintenance of the said wife.

3. In the event the wife insists on her express determination to file a suit for divorce against the husband, it shall be thoroughly understood that the party of the second part denies and expects to continue to deny that she is in any way entitled to a divorce, and in the event the Court, upon hearing, should decide

that the wife is entitled to a divorce, then it is agreed and understood that this agreement and all of its terms shall be submitted to the court for its approval, and shall not be binding until and unless the court does approve the same.

4. Among the furniture herein conveyed to the wife is a electric refrigerator on which there is a balance owing, and which was bought in the name of the husband; it is expressly understood and agreed that the wife assumes, and agrees to pay, the said balance due.

This agreement has been made and executed by the parties hereto on the day and date hereinabove first set forth, in good faith, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.

FILED
9-26 1955
ALICE J. BUCK, Register

Arthur Williams (SEAL)

Mary C. Williams (SEAL)