

The State of Alabama }  
Baldwin County

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

Will King,

COMPLAINANT

VS.

Callie Mae King,

RESPONDENT

I, Ida M. Turnbull,

as ~~Register and~~ Commissioner

have called and caused to come before me

Will King and Rosetta Hail

witnesses named in the Requirement for Oral Examination, on the 16th day of November,

1935, at the office of Beebe & Hall,

in Baldwin County, Alabama, and having first sworn said witness ~~es~~ to speak the

truth, the whole truth, and nothing but the truth, the said Will King and

Rosetta Hail

doth depose and say as follows:

My name is Will King. I am the complainant in the case of Will King against Callie Mae King pending in the Circuit Court of Baldwin County, Alabama, in equity, for divorce. I am over the age of twenty-one years and a resident of Baldwin County, Alabama. Callie Mae King is over the age of twenty-one years and a resident of Baldwin County, Alabama. That each of us have lived in this County all of our lives. I am thirty-six years old and Callie is twenty-six.

Callie and I were married in Baldwin County on September 3rd, 1930, and we lived together as husband and wife until May, 1935, when Callie and I separated, and we have not lived together as husband and wife since. We separated at Loxley, in Baldwin County, Alabama. That the immediate cause of our separation was that Callie got to running around with other men and keeping company with them at any and all hours of the night, and I tried to talk to her about it and she got mad and said it was her business and she was going to do as she pleased and she left me. She came to Bay Minette and has lived in Bay Minette ever since. I have been living near Loxley. I am told that since she came to Bay Minette she has been keeping company with other men and has committed adultery with various other men whose names are unknown to me.

Will King

179

THE STATE OF ALABAMA, }  
Baldwin County.

No. 179 Circuit Court, In Equity

Will King Complainant

vs.

Callie Mae King Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of 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 the Complainant is forever divorced from the Defendant.

It is further ordered that the said parties be, and they are hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Will King pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may be issued against the said

Callie Mae King

It is further ordered, adjudged and decreed that said Will King shall not again marry except to said Callie Mae King until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Callie Mae King during the said pendency of appeal

This 29th day of November 1935

F. W. Hare  
Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, }  
Baldwin County.

Circuit Court, In Equity.

I, Robert S. Duck Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the 29th day of November 1935 in the cause of

Will King Complainant

vs.

Callie Mae King Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the Fourth

day of December 1935

Robert S. Duck

Register

WILL KING,  
Complainant,  
vs.  
CALLIE MAE KING,  
Respondent.

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

CALLIE MAE KING, respondent in the above styled cause, hereby waives notice of application to take testimony in the foregoing cause; waives notice of the time and place of taking same; waives the right of cross-examination and consents that said cause may be set down for hearing upon motion of solicitor for complainant without notice to her.

Dated this the 15 day of November, 1935.

Callie Mae King  
Respondent.

WILL KING,  
Complainant,  
vs.  
CALLIE MAE KING,  
Respondent.

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

Comes CALLIE MAE KING, respondent in the above styled cause, and answering complainant's bill of complaint, and each and every paragraph and allegation thereof, says that the matters therein alleged are untrue, and she demands strict proof of the same. And having fully answered, respondent prays she may go hence with her reasonable costs.

*Callie Mae King*  
Respondent.

THE STATE OF ALABAMA, }  
Baldwin County.

No. \_\_\_\_\_ Circuit Court, In Equity

*Will King* ..... Complainant

*Callie Mae King* ..... Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of 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 the Complainant is forever divorced from the Defendant.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

It is further ordered that the said *parties* be, and ~~they are~~ is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said *Will King* pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may be issued against the said

*Callie Mae King*

It is further ordered, adjudged and decreed that said *Will King* shall not again marry except to said *Callie Mae King* until sixty days after this date, and that if an appeal is taken within sixty days

he shall not marry again except to said *Callie Mae King* during the said pendency of appeal

\_\_\_\_\_  
\_\_\_\_\_

This *29th* day of *November* 193*5*

*J. W. Hare*  
Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, }  
Baldwin County.

Circuit Court, In Equity.

I, \_\_\_\_\_ Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the \_\_\_\_\_ day of \_\_\_\_\_ 193\_\_\_\_\_ in the cause of \_\_\_\_\_

Complainant

vs.

Defendant  
as appears of record in said Court.

Witness my hand and the seal of said Court, this the \_\_\_\_\_ day of \_\_\_\_\_ 193\_\_\_\_\_

Register

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

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon Callie Mae King

of Baldwin County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

Will King

against said Callie Mae King

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 2nd day

of November 1935

Robert S. Duck Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register. 7.

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

To Mrs Ida M Turnbull.

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 Will King. And Rosetta Hail

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

is Complainant

and Callie Mae King.

is Defendant,

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

Witness 16th day of November. 1935

*Rubens Duck*

REGISTER

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

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

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

Comes WILL KING and humbly complaining against CALLIE  
MAE KING, respectfully shows unto your Honor:

FIRST:

That your complainant is over the age of twenty-one years  
and a resident of Baldwin County, Alabama; that the said Callie Mae  
King is over the age of twenty-one years and a resident of Baldwin  
County, Alabama; that your complainant and the said Callie Mae  
King have resided in said State and County all of their lives.

SECOND:

That your complainant and the said Callie Mae King were  
married in Baldwin County, Alabama, on September 3, 1930, and lived  
together as man and wife until May, 1935, when your complainant  
and the said Callie Mae King separated and have not lived together  
as husband and wife since; that at the time of said separation  
they were living near Loxley, in Baldwin County, Alabama.

THIRD:

That the immediate cause of your complainant and the  
said Callie Mae King's separation was that your complainant re-  
monstrated with the said Callie Mae King about her conduct in  
keeping company with other men at any and all hours of the night,  
and that the said Callie Mae King left your said complainant at  
said time and place and has since then resided in Bay Minette,  
Alabama; that since her coming to Bay Minette, Alabama, the said  
Callie Mae King has committed adultery with various persons whose  
names are unknown to your complainant.

WHEREFORE, your complainant prays this Honorable Court  
will take jurisdiction of the cause made by this bill of complaint,  
and cause the said Callie Mae King to be made a party hereto, and  
require her to plead, answer or demur to the same within the time



and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon a final hearing of the cause made by this bill of complaint this Honorable Court will make and enter an order and decree forever dissolving the bonds of matrimony existing between the said complainant and the said Callie Mae King. And your complainant prays for such other, further or different relief as in equity and good conscience he shall be entitled to receive.

*Will King*  
*Beebe Hall*  
\_\_\_\_\_  
Solicitors for Complainant.

The said Callie Mae King is required to answer each and every allegation contained in this bill of complaint, from Paragraph FIRST to THIRD inclusive, but not under oath, oath is hereby expressly waived.

*Beebe Hall*  
\_\_\_\_\_  
Solicitors for Complainant.

RECORDED  
NO. 179  
6-21-28

The State of Alabama  
BALDWIN COUNTY  
CIRCUIT COURT

Will King

vs. Complainant

Callie Mae King

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Mrs Ida M Purnbull

WITNESSES:

RECORDED  
6-25-37

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Serve on \_\_\_\_\_  
Circuit Court of Baldwin County  
IN EQUITY

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

*Willie King*

VS.

*Carrie Mae King*

*Becke v. King*  
Solicitor for Complainant

Recorded in Vol. \_\_\_\_\_ Page \_\_\_\_\_

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 1935

*W. H. Williams*  
SHERIFF

Executed this 11-2 day of \_\_\_\_\_

1935

by leaving a copy of the within Summons with

*Callie Mae King*

Defendant

*M. H. McIlhenny*  
Sheriff

By *C. W. Anderson*  
Deputy Sheriff

RECORDED

*Welch*

2-18-14

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY  
Baldwin County, Ala.

VS.

DECREE OF DIVORCE

Filed in office this

*20* *th*

day of

*Nov*

193*5*

*Robert J Welch*

REGISTER

H. O. M.

MOORE PRINTING CO., BAY MINETTE, ALA.

Filed this

*30* *th* *Nov* *1935*

*Richard Welch*

CLERK

179

RECORDED  
Duck  
6-258

Wm King

N<sup>o</sup> 12  
Callen & Co King

Dinner

Drifts' Answer

Filed May 16, 1938  
Patent & Duck

Register

Filed this day 10

Clerk-Register

179

RECORDED  
INDEXED  
6-25-78

Will King

RD

Carrie Mae King

Alvance

Manager of  
Dept.

Fried ~~Mar~~ 16, 1933

Michael  
Central District

Reprints

No. 179

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY  
Baldwin County, Ala.

Will King

vs.

Callie Mae King

DECREE OF DIVORCE

Filed in office this 30th

day of November 1935

*Charles D. Dyer*  
REGISTER

E. O. M.

ORAL EXAMINATION

I, IDA M. TURNBULL, as ~~Register~~ Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down in writing by me in the words of the witness ~~es~~ and read over to them and they 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 ~~es~~ or had proof made before me of the identity of said witness~~es~~; 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 16th day of November, 1935.

Ida M. Turnbull (L. S.)

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

The State of Alabama  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Will King,  
COMPLAINANT

VS.

Callie Mae King,  
RESPONDENT

ORAL DEPOSITION

Filed Nov. 22, 1935

Robert S. Buck, Register  
RECORDED IN 7.

Record \_\_\_\_\_

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

Register \_\_\_\_\_



RECORDED  
INDEXED  
NO. 179  
6-21-28

The State of Alabama  
BALDWIN COUNTY  
CIRCUIT COURT

Will King

Complainant

vs.

Callie Mae King

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Mrs Ida M Parrault.

WITNESSES:

RECORDED  
INDEXED  
6-25-27

Serve on \_\_\_\_\_

Circuit Court of Baldwin County  
IN EQUITY

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

SUMMONS

*Willie Karp*

VS.

*Lucie M. Karp*

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Received in office this \_\_\_\_\_

day of \_\_\_\_\_, 1935

*W. H. Perkins*

SHERIFF

Executed this 11-2 day of \_\_\_\_\_

1935

by leaving a copy of the within Summons with

*Callie Mae King*

Defendant

*M. H. McIlhenny*

Sheriff

By *Carl N. Anderson*

Deputy Sheriff

*Beckie Karp*  
Solicitor for Complainant

RECORDED  
Welch  
2-18-14

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY  
Baldwin County, Ala.

VS.

DECREE OF DIVORCE

Filed in office this

20<sup>th</sup> 14

day of

Nov.

1935

Robert J. Welch  
REGISTER

F. O. M.

MOORE PRINTING CO., BAY MINNETTE, ALA.

Filed this 20<sup>th</sup> Nov 1935  
Robert J. Welch  
Clerk of Circuit Court

179  
RECORDED  
Duck  
6-258

Miss King  
N<sup>o</sup> 12  
Callie Mae King

---

Dinner

---

Drifts' Answer

---

Filed May 16, 1938  
Patent & Duck

Register

Filed this 20y 19

Client-Register

179  
RECORDED  
INDEXED  
6-258

Will King

PO

Carrie Mae King

Alma

Manager of  
Dept.

Filed ~~Mar~~ 16, 1933

Miss King  
Richard Owen

Requests

No. 179

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**CIRCUIT COURT, IN EQUITY**  
Baldwin County, Ala.

Will King

vs.

Callie Mae King

**DECREE OF DIVORCE**

Filed in office this 30th

day of November 1935

*Robert M. King*  
REGISTER

F. O. M.

ORAL EXAMINATION

I, IDA M. TURNBULL, as ~~Register~~ Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down in writing by me in the words of the witness ~~es~~ and read over to ~~them~~ and ~~they~~ 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 ~~es~~ or had proof made before me of the identity of said witness ~~es~~; 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 16th day of November, 1935.

Ida M. Turnbull (L. S.)

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

The State of Alabama  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

WILL KING,

COMPLAINANT

VS.

Callie Mae King,

RESPONDENT

ORAL DEPOSITION

Filed Nov. 22, 1935

Robert S. Buck, Register  
RECORDED IN 7.

Record \_\_\_\_\_

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

Register \_\_\_\_\_

*Will King*

vs.

*Callie Mae King*

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,

*and depositions of Will King  
and Resetta Hill*

and in behalf of Defendant upon

*Robert S. D.*



8550 REQUEST FOR DECREE IN VACATION.

MOORE PTO CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. \_\_\_\_\_ Term, 192\_\_\_\_\_

*Will King* \_\_\_\_\_, Complainant  
vs.

*Callie Mae King* \_\_\_\_\_, Defendant

To *Robert S. Fuch* \_\_\_\_\_, Register :

*answers and waiver of notice*  
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 *Bebe 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 vacation.

*Bebe Hall* \_\_\_\_\_  
Solicitor for Complainant.

**RECORDED**

*Duck*

No. ....

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THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

VS.

REQUEST FOR DECREE IN  
VACATION

FILED *Nov. 22* 19*35*

*Robert S. Duck*

Register *7*

RECORDED IN ..... RECORD

VOL. .... PAGE .....

Register

RECORDED

*Duck*

6-20-19

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

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

VS.

**NOTE OF TESTIMONY**

Filed in Open Court this 22

day of Nov. 1935

*Robert S Duck*

REGISTER

BEEBE & HALL  
LAWYERS  
BAY MINETTE, ALA.

Will King,  
Complainant,  
vs.  
Callie Mae King,  
Respondent.

DEPOSITIONS OF  
WILL KING and ROSETTA HALL  
IN BEHALF OF COMPLAINANT.

Filed Nov 22 7

Robert S. Davis

Ref

John M. Mumford  
Comptroller