

EDNA GRAY

vs.

W. B. GRAY

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, _____

Decree pro confesso on personal service against Respondent and Testimony
of Complainant.

and in behalf of Defendant upon _____

H.M. HALL

Heirich. Luck.
Register.

No.

THE STATE OF ALABAMA .
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

EDNA GRAY

vs.

W. B. GRAY

NOTE OF TESTIMONY

Filed in Open Court this 13th

day of June, 1949

Wesley J. Weir
Register.

Printed By The Baldwin Times

STATE OF ALABAMA §
BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon W. B. GRAY, 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 EDNA GRAY, as Complainant and against W. B. GRAY, as Respondent.

WITNESS my hand this the 8th day of April, 1949.

Archie J. Leach
Register

=====

EDNA GRAY	§	IN THE CIRCUIT COURT OF
COMPLAINANT	§	BALDWIN COUNTY, ALABAMA
VS.	§	IN EQUITY
W. B. GRAY	§	
RESPONDENT	§	
	§	

TO HON. TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Your Complainant Edna Gray, respectfully represents and shows
unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide
residences of Baldwin County, Alabama, and over twenty-one years of
age.

2.

That your Complainant and the Respondent married in Lucedale,
Mississippi, on December 12, 1948, and lived together as husband
and wife until April 1, 1949.


3.

That on April 1, 1949, the Respondent committed actual violence
on the person of your Complainant by striking her, which necessarily
endangered her life and health; that the conduct of the Respondent
was such as to give your Complainant every reasonable apprehension
to believe that if she continued to live with the Respondent he

would commit further 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 W. B. Gray party respondent to this bill of complaint, 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 final hearing hereof your Honor will make and enter a decree forever barring the bonds matrimony existing between your Complainant and the Respondent; 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 Complainant

Received in Sheriff's Office
this 11 day of April 1949
TAYLOR WILKINS, Sheriff

NO 2264

5-2-49

Executed 5-2-49
By serving a copy
of the within writ
on W. B. Gray
Taylor Wilkins Sheriff
by Leigh Headman

EDNA GRAY

COMPLAINANT

VS.

W. B. GRAY

RESPONDENT

Filed 4-8-49
Dee. J. Couch
Register

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

EDNA GRAY

Complainant

VS.

W. B. GRAY

Respondent

I, LOUISE MORRIS

as Register and Commissioner

have called and caused to come before me Edna Gray

witness named in the Requirement for Oral Examination, on the 10 day of June 1949, at the office of H. M. Hall in Baldwin County, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said Edna Gray doth depose and say as follows:

My name is Edna Gray. I am over twenty-one years of age, and a bona fide resident of Baldwin County, Alabama. The Respondent W. B. Gray, is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama.

The Respondent and I married at Lucedale, Mississippi, on December 12, 1948. We lived together as husband and wife in Baldwin County until April 1, 1949. The Respondent on April 1, 1949, committed actual violence to my person by striking me several times. He had often before that time threatened and abused me, which on several occasions had actually struck me. That said acts of actual violence 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 my person which would necessarily endanger my life and health. The conduct of the Respondent toward me is such as to render it impossible for me to live with him as his wife.

Edna Gray

ORAL EXAMINATION.

I, LOUISE MORRIS, 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 H. M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness—or had proom 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 10—day of June, 1942.

Louise Morris (L. S.)

NO. _____	PAGE _____
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY.	
EDNA GRAY	
vs.	Complainant
W. B. GRAY	
Respondent.	
Oral Deposition	
Filed <u>6-13</u> , 194 <u>2</u>	
<u>Reigel. Leuch</u> , Register.	
Recorded in _____	
Record _____	
Vol. _____	Page _____
_____, Register.	

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: LOUISE MORRIS

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 EDNA GRAY

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

_____, Complainant

and W. B. GRAY

_____, Respondent

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

Witness 10 day of June, 194 9

Amos J. Luck
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

EDNA GRAY

Complainant

VS.

W. B. GRAY

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

EDNA GRAY

, Complainant

vs.

W. B. GRAY

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Personal service 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 Edna Gray is forever divorced from the said W. B. Gray 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 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 Edna Gray the Complainant pay the cost herein to be taxed, for which execution may issue.

This 13th day of June, 1949.

Walter J. Mosley, Jr.
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. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

EDNA GRAY

Complainant

vs.

W. B. GRAY

Respondent

DIVORCE DECREE

FILED

JUN 15 1949

ALICE J. DUCK, Register

2267