

THE STATE OF ALABAMA }
Baldwin County }

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

BEULAH STRONG

COMPLAINANT

vs.

CLIFTON C. STRONG

RESPONDENT

I, Louise Morris

as Register and Commissioner

have called and caused to come before me Beulah Strong

witness named in the requirement for Oral Examination, on the 17 day of May

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 Beulah Strong

doth depose and say as follows:

My name is Beulah Strong. I am a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age.

The Respondent Clifton C. Strong, is a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age.

The Respondent and I married in Copiah County, Mississippi in 1916. We lived together as husband and wife until on to-wit, in September 1948.

We were living in Baldwin County, Alabama, at the time of our separation. The Respondent in September 1948, and on occasions prior thereto threatened and abused me and threatened to take my life and to do other violence to my person which would necessarily endanger 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 violence to my person which would necessarily endanger my life and health.

The Respondent and I have only one child, a daughter, now married.

The Respondent and I have made a full, and complete settlement as to all of our property rights and all questions as to alimony or any other claims that I might have. We have made a division of the property whereby the Respondent conveyed to me certain property and I have conveyed to him certain property which is fully agreeable to both of us.

Beulah Strong

I, Louise Morris 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 her and she signed the same in the presence of myself and H. M. Hall

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 17 day of May, 1949.

Louise Morris (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EMULAH STRONG

COMPLAINANT

vs.

CLIFTON C. STRONG

RESPONDENT

ORAL DEPOSITION

Filed FILED 1949

MAY 20 1949, Register.

ALICE J. DOCK, Register

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 BEULAH STRONG

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

Complainant
and CLIFTON C. STRONG

Respondent

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

Witness 17th day of May, 194 9

Beulah Strong
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

BEULAH STRONG

Complainant _____

VS.

CLIFTON C. STRONG

Defendant _____

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LOUISE MORRIS

WITNESSES:

BEULAH STRONG

vs.

CLIFTON C. STRONG

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

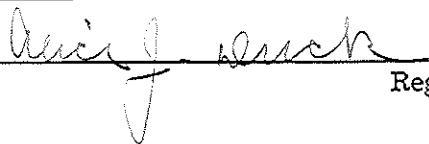
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____

~~Answer and waiver of Respondent and testimony of Complainant~~

and in behalf of Defendant upon _____

H. M. HALL



Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

BEULAH STRONG

vs.

CLIFTON C. STRONG

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

FILED

MAY 20

Register.

ALICE J. DUNCAN

Printed By The Baldwin Times

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon CLIFTON C. STRONG, 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 BEULAH STRONG, as Complainant, and against CLIFTON C. STRONG, as Respondent.

WITNESS my hand this 10th day of May, 1949.

Alice C. [Signature]
Register

BEULAH STRONG

COMPLAINANT

VS.

CLIFTON C. STRONG

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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

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

1.

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

2.

That your Complainant and the Respondent married at Utica Mississippi, in 1916, and lived together as husband and wife, until in September 1948.

3.

That in September 1948, the Respondent threatened and abused your Complainant and threatened to take her life, and to do other violence to her person which would necessarily endanger her life and health. That the conduct of the Respondent was such as to give your 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 actual violence to her person which would necessarily endanger

her life and health.

4.

That on October 6, 1944, your Complainant and the Respondent purchased from Jacob Lewis and Nora Lewis, the following described real property in Baldwin County, Alabama, together with the improvements thereon, and the fixtures in the store, located on said property to-wit:

West half of West half of Southwest quarter of Northwest quarter of Section 29, Township 7 South, Range 4 East;

that the title for convenience was taken in the name of the Respondent; that said deed appears of record in the office of the Probate Judge of Baldwin County, Alabama, in Deed Book 83 NS pages 588-9; that the Complainant furnished a greater part of the purchase price for the said property, and that she has since the purchase of said property made expensive improvements thereto.

5.

That your Complainant has no property or means of support other than the home and the store, located upon the said property; that the Respondent is an able bodied man, capable of supporting himself and your Complainant.

WHEREFORE the premises considered your Complainant prays that your Honor will by proper process make the said CLIFTON C. STRONG, party respondent hereto requiring him to plead, answer or demur hereto, within the time and under the penalties prescribed by law, and the practice of this Honorable Court; that your Honor will order a reference to ascertain a reasonable amount to be paid by the Respondent to the Complainant as alimony pendente lite and Solicitor's fees; that your Honor will ascertain and decree the interest of your Complainant in and to the property herein described.

Your Complainant further prays that upon a final hearing hereof your Honor will grant to her a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent; that your Honor will award to her such amount as shall seem meet and proper as permanent alimony; that a decree be made ascertaining the interest of your Complainant in and to the property herein described, to-wit:

The West half of West half of Southwest quarter of Northwest quarter of Section 29, Township 7 South, Range 4 East, to-

gether with the improvements thereon and the fixtures in
said store;

That a lien be established to protect the interest of your
Complainant in and to said property; that in the event the Respondent
does not pay to your Complainant the amount ascertained as alimony,
Attorney's fee, and interest in and to said property, that said prop-
erty be ordered sold and the proceeds thereof, or so much thereof
as may be necessary applied to the lien established by your Honor
in favor of your Complainant; that your Honor will give and grant
to your Complainant such other, further, different or general relief
as she may be in equity and good conscience entitled to receive and
as in duty bound she will ever pray.

Wm. H. Hall
Solicitor for Complainant.

The Respondent lives
at Foley.

no 2288

3-12-49

Received in Sheriff's Office
this 10 day of May, 1949
TAYLOR WILKINS, Sheriff

BEULAH STRONG

COMPLAINANT

VS.

CLIFTON C. STRONG

RESPONDENT

Executed 5-13-49 1949
by serving copy of within Summons and
Complaint on

Clifton C. Strong

Taylor Wilkins Sheriff

cc: *Blair Stenhouse* Deputy Sheriff

FILED

MAY 10 1949

ALICE J. DUCK, Register

BEULAH STRONG
COMPLAINANT
VS.
CLIFTON C. STRONG
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Now comes the Respondent in his own proper person and for answer to the Complainant's bill of complaint and each allegation therein says:

1.

He admits the allegations as to residences, ages and marriage.

2.

He denies all allegations as to cruelty and demands a strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses; and agrees that this cause be submitted for final decree without notice.

Clifton C. Strong

STATE OF ALABAMA
BALDWIN COUNTY

I, Wm. H. Hall, a Notary Public, in and for said County, in said State, hereby certify that Clifton C. Strong, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 17th day of May, 1949.

Wm. H. Hall
Notary Public, Baldwin County, Alabama.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BEULAH STRONG, Complainant

vs.

CLIFTON C. STRONG, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on 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 Beulah Strong is forever divorced from the said Clifton C. Strong 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 Beulah Strong the Complainant pay the cost herein to be taxed, for which execution may issue.

This 20th day of May, 1949.

Julian J. Mashburn, 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.

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No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

BEULAH STRONG

Complainant

vs.

CLIFTON C. STRONG

Respondent

DIVORCE DECREE

FILED

MAY 20 1949

ALICE J. DUCK, *Register*