

Eth	Youres	
	Complainant.	,

Vs.

Clayton Younce Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY.

To the Honorable Judges of the Circuit Court of Beldwin County, Sitting in Equity:

Your complainant, Ethel Younce, respectfully represents and shows unto your Honors:

- and is a resident of said State and County, and has been a bone fide resident of said State for more than two years next preceding the filing of this bill of complaint; that Clayton Younce is over the age of twenty-one years and resides in Baldwin County, Alabama.
- 2. That your complainant and respondent were lawfully married on or about, to-wit, October 21, 1928, at Summerdale, Alebama.
- Spondent did on or about the 5th day of June, 1948, and many times subsequent thereto assault, beat, hit and strike complainent; that said respondent has committed actual violence on her person attended with danger to her health or life; complainent avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

The premises considered, your complainant makes the said Clayton Youngs a party respondent to this bill of complaint, and in order that complainent may have the relief herein prayed for, may it please your Honors to cause the State's writ of subposes to be issued, directed to the said Clayton Youngs, commending him to enswer, plead or demur to this bill or complaint, within the time required by law; and that on a final hearing of this cause, that your Honors will enter a decree

divorcing your compleinant from sold respondent, granting the compleinant compleinant the right to resume her moiden near; and that your Sonors will grant such other, further and different relie; as unto your Monors may seem just and proper, and your compleinant will ever gray.

Arthur C Chause

Ethel Younce Complainent.

Vo.

Clayton Younge Respondent. TA THE CIRCUIT COURT OF BALDWIN COURTY, ALABAMA. IN EQUITY.

To the Monorable Judges of the Circuit Court of Beldwin County, Sitting in Equity:

Your compleinant, Ethel Tounce, respectfully represents and shows unto your Bosons:

- 1. That complainant is over the age of twenty-one years and is a resident of said State for more than two years next preceding the filing of this bill of complaint; that Clayton Younce is over the sage of twenty-one years and resides in Baldwin County, Alabama.
- 2. That your complainent and respondent were lawfully married on or about, to-wit, October 21, 1928, at Summerdale, Alabama.
- 3. Your completent evers and shores that the soid respondent did on or about the 5th day of June, 1948, and many
 times subsequent thereto assault, beat, hit and strike complainent; that said respondent has committed actual violence
 on her person attended with dancer to her health or life;
 complainent avers and charges that respondent has made numerous
 threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit
 an actual violence upon her person, attended with danger to her
 life or health.

Clayton Younce a party respondent to this bill of complaint, and in order that complainent may have the relief herein prayed for, may it please your Honors to cause the State's writ of subposes to be issued, directed to the said Clayton Younce, commanding him to enswer, plead or demar to this bill of complaint, within the time required by law; end that on a final heaving of this cause, that your Honors will enter a decree

divorcing your compleinant from said respondent, granting the compleinant the right to remerry, and granting the compleinant the right to resume her maiden name; and that your Konors will grant such other, further and different relief as unto your Honors may esem just and proper, and your compleinant will ever pray.

Lither C. Opperen

Ethel Younce Complainant.)	IN THE CIRCUIT COURT OF BALDWIN
)	IN THE CIRCUIT COCKE OF DAMPINE
Vs.))	COUNTY, ALABAMA. IN EQUITY
Clayton Younce Respondent.)	

This cause, coming on to be heard, was submitted for final decree upon the pleadings and proof as noted by the Register.

Upon consideration thereof, it is ordered, adjudged and decreed by the Court as follows:

- 1. That the bonds of matrimony heretofore existing between the complainant and respondent are dissolved, and the said Ethel Younce is forever divorced from the said Clayton Younce.
- 2. That both parties are hereby permitted to again contract marriage, subject to the provisions of paragraph four hereof.
- 3. That the costs of Court accrued herein be and the same hereby are taxed against the respondent, for the collection of which execution may issue, and if such execution is returned "no property found" then execution for costs may issue against the complainant.
- 4. That the complainant shall not marry again except to the respondent until sixty (60) days after this date, and if an appeal from this decree is taken within sixty (60) days from the date hereof complainant shall not marry again except to the respondent during the pendency of said appeal.

Ordered	and.	decreed,	this	the	day	of		1949
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Ethel Younce Complainant.	IN THE CIRCUIT COURT OF BALD	NIN
XS•) COUNTY, ALABAMA. IN EQUITY	
Cleyton Younce Respondent.		
This cause,	coming on to be heard, was submitted for	· 115

This cause, coming on to be heard, we submitted for final decree upon the pleadings and proof as noted by the Register.

Upon consideration thereof, it is ordered, adjudged and decreed by the Sourt as follows:

- tween the complainant and respondent are dissolved, and the said Ethel Younce is forever divorced from the said Clayton Younce.
- 2. That both parties are hereby permitted to again contract marriage, subject to the provisions of paragraph four hereof.
- 3. That the costs of Court secress herein be and the same hereby are taxed against the respondent, for the collection of which execution may issue, and if such execution is returned "no property found" then execution for costs may issue against the complainant.
- A. That the complainent shell not marry again except to the respondent until sixty (60) days after this date, and if an appeal from this decree is taken within sixty (60) days from the date hereof complainent shell not marry again except to the respondent during the pandency of said an eal.

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Circuit Judge, in Equity Sitting.

Ethel Younce								
Compleinant.	Property Security		The state	THE	And the second of the second	COURT	01 11	LDVIA
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Clayton Tounce	A STATE OF THE PARTY OF THE PAR			:	r			

Respondent.

This coust, coming on to be heard, we submitted for final decree upon the pleadings and proof as noted by the Register.

Upon consideration thereof, it is ordered, adjudged and decreed by the Court as follows:

- 1. That the bonds of matrimony heretofore existing betown the complainent end respondent are dissolved, and the said Ethel Youngs is forever divorced from the said Clayton Youngs.
- 2. That both parties are hereby permitted to again contract marriage, subject to the provisions of paragraph four bereof.
- 3. That the costs of Court corned herein be end the same hereby are taxed escinet the respondent, for the collection of which execution may issue, and if evolvencession is returned. "no property found" then execution for costs may issue equinst the complainant.
- the respondent until sixty (60) days after this data, and if an appeal from this decree is taken within sixty (60) days after this data, and if from the data hereof complainant shall not marry again except to the respondent during the pendency of said appeal.

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Circuit Jussy An Louity Sittings.

Ethel Wounce Compleinant:

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Clayton Younce Respondent. ONNER, ALABAMA. IN EQUITY

This cause, coming on to be heard, who submitted for final decrees upon the plandings and proof as noted by the Register.

Upon consideration thereof, it is ordered, adjudged and decreed by the Court as follows:

- 1. That the bonds of matrimony heretofore existing between the complainent and respondent are dissolved, and the said Stael Founds is forever divorced from the said Clayton Younds.
- tract marriage, subject to the provisions of paragraph four hereof.
- 3. That the costs of Court accreed herein be and the same hereby are taxed excinst the respondent, for the collection of which execution may issue, and if also execution is returned "no property found" then execution for costs may issue against the complement.
- A. That the compleinant shall not marry again except to the respondent until sixty (60) days after this date, and if an access from this decree is taken within sixty (60) days from the date hereof compleinant shall not marry again except to the respondent during the pendagty of said ap eal.

Ordered	and decreed,		And the	- the white philosophy of the manufacture of the property of the control of the c	OT	net (Sporyma bles mingraphs of the entropy common Arthritish (Arthritish Arthritish	1949.
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Circuit Index, in the states

Ethel Younce Complainant.

Vs.

Clayton Younce Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN SQUITY.

ANSWER TO BILL OF COMPLAIRT

Comes the respondent in the spove styled cause and files the Tollowing answer and waiver by the completent filed herein:

- l. Respondent admits each and every material allegation contained in Paragraph One of the Complainant's complaint herein.
- 2. Respondent admits each and every material allegation contained in Paragraph Two of the Complainant's complaint herein.
- 3. Respondent denies each and every meterial allegation in Peragraph Three of said bill of complaint and DEMANDS STRICT PROOF of all material allegations of said paragraph.

WAIVER

The respondent hereto waives any and all further notice or service of process in this cause and attributes that same may go hence to its final disposition without any notice to him or of any service of process. Respondent hereby specifically waives any and all other or further notice or service herein.

Witnesses

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ETREL YOUNGS Ocmpleinent.

Heritati gitti.

CLAYTON YOUNCA Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY

New comes the plaintiff and propounds interrog tories to ETHEL YOUNCE, a witness whose testimony, when taken, will be meterial evidence for the plaintiff on the trial of the above cause.

Interrogetories to LTHEL YOUNCE, with se:

First Interpogatory:

What occurred on the 5th day of June, 1948 in relation to your charge of physical gravely against the respondent?

CTTT OR ALABAMA,

Attorney for the Plaintiff.

PALIMIN CENT

for said State and County, personally appe rad Arthur C. Epperson who being by me first duly soom detoses and says: That he is agent and attorney for the plaintiff, Ethel Younce; that the witness whose testimony is to be taken is a woman; that the ditness, Ethel Younce, is a material witness for the plaintiff and her evidence to be secured by this deposition will be material evidence for the plaintiff on the trial of this cause.

Attorney for Plant Wife.

Sworn to and subscribed before me this lotteday of July, 1949

farl L. Dureau

The name of Catherine Mason, Foley, Alabama, is suggested as a fit and suitable person to take down the answers to the forescing interrogatories and it is requested that a commission taken to ser for that purpose.

Arthur C. Checonitition and the Photontiff.

ARTHUR C. EPPERSON

ATTORNEY AT LAW
POPPE BUILDING
FOLEY, ALABAMA

July 11, 1949

Mrs. Alice Duck Clerk, Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

In re: Ethel Younce

Complainant.

Clayton Younce

I am forwarding an oral deposition in the referred case with the commission to take deposition. Week before last when I was in your office I didn't see the judge, therefore I am still uncertain as to the necessity of my personal appearance before him to present this evidence and obtain a decree. If it is necessary please notify me of the date he has set for the hearing and I will be there. Thank you.

Yours truly,

Arthur C. Epperson

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THE STATE OF ALABAMA Baldwin County

Circuit Court

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ETHEL YOUNCE	
The state of the s	
Manager Committee Committe	
	mplainant
VS.	
CLAYTON YOUNCE	Ŝ
<u> </u>	
]	Defendant
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COMMISSIONER:	
CATHERINE MAS	ON
WITNESSES:	
ETHEL YOUNCE	

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Ethel Younce
Complainant.

IN THE CIRCUIT COURT OF BALDWIN

Vs.

Clayton Younce
Respondent.

To the Honorable Judges of the Circuit Court of Baldwin County, Sitting in Equity:

Your complainant, Ethel Younce, respectfully represents and shows unto your Honors:

- 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 Clayton Younce is over the age of twenty-one years and resides in Baldwin County, Alabama.
- 2. That your complainant and respondent were lawfully married on or about, to-wit, October 21, 1928, at Summerdale, Alabama.
- 3. Your complainant avers and charges that the said respondent did on or about the 5th day of June, 1948, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

The premises considered, your complainant makes the said Clayton Younce a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honors to cause the State's writ of subpoena to be issued, directed to the said Clayton Younce, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honors will enter a decree

divorcing your complainant from said respondent, granting the complainant the right to remarry, and granting the complainant the right to resume her maiden name; and that your Honors will grant such other, further and different relief as unto your Honors may seem just and proper, and your complainant will ever pray.

Athur C. Caperson Solicitor for Complainant

no 2309

Ethel younce

Clayton Jounce

Bill of Complant

FILED
JUN 29 1949
ALICE J. DUCK, Register

Ethel Younce Complainant.

۷s.

Clayton Younce Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY.

ANSWER TO BILL OF COMPLAINT

Comes the respondent in the above styled cause and files the following answer and waiver by the complainant filed herein:

- 1. Respondent admits each and every material allegation contained in Paragraph One of the Complainant's complaint herein.
- 2. Respondent admits each and every material allegation contained in Paragraph Two of the Complainant's complaint herein.
- 3. Respondent denies each and every material allegation in Paragraph Three of said bill of complaint and DEMANDS STRICT PROOF of all material allegations of said paragraph.

WAIVER

The respondent hereto waives any and all further notice or service of process in this cause and stipulates that same may go hence to its final disposition without any notice to him or of any service of process. Respondent hereby specifically waives any and all other or further notice or service herein:

Witnesses

\$1 8 Rogers

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ETHEL YOUNCE Complainant.

VS.

CLAYTON YOUNCE Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY

Now comes the plaintiff and propounds interrogatories to ETHEL YCUNCE, a witness whose testimony, when taken, will be material evidence for the plaintiff on the trial of the above cause.

Interrogatories to ETHEL YOUNCE, witness:

First Interrogatory:

What occurred on the 5th day of June, 1948 in relation to your charge of physical cruelty against the respondent?

STATE OF ALABAMA,

Attorney for the /Pyaintiff.

BALDWIN COUNTY.

Before me _______, a Notary Public in and for said State and County, personally appeared Arthur C. Epperson who being by me first duly sworn deposes and says: That he is agent and attorney for the plaintiff, Ethel Younce; that the witness whose testimony is to be taken is a woman; that the witness, Ethel Younce, is a material witness for the plaintiff and her evidence to be secured by this deposition will be material evidence for the plaintiff on the trial of this cause.

Attorney for Plaintiff.

Sworn to and subscribed before me this 6 th day of

· lez, 1949.

Notery Public.

The name of Catherine Mason, Foley, Alabama, is suggested as a fit and suitable person to take down the answers to the foregoing interrogatories and it is requested that a commission issue to her for that purpose.

Attorney for the Plaintiff.

THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

	ETHEL YOUNCE		,	Complainant	
	•	VS.			
	CLAYTON YOUNG	E		Respondent	
I ,	CATHERINE MASON				
•	Commissioner caused to come befor	C 111C	I. YOUNCE		
	ned in the Requirement coffice of Cather		nination, on th	ne llthday of J	ıly
in Foley		na, and having		id Witness to	o speak the
,	doth ‹	depose and say	as follows:		6 6 7

There has been different times when my husband and me would get into an argument and it most always would lead up to him striking me or kicking me. I know of once he threw a hammer at me which if it had of hit me would have been very serious. just closed the door in time and as it was it broke a hole in the screen. Those kind of arguments got to be pretty often and I was afraid to be close to him because he might hit me. My health began to get bad and the Dr. told me it was my nerves. told the Dr. what was happening between me and my husband. Dr. told me as long as things went on like that I would not get any better. I told my husband what the Dr. had said and he said there wasn't a dam thing wrong with me that I was just trying to find something to whine about and get him in debt. I was getting ready to go to bed when I told him this. We argued some and he said well if you don't want to stay in it you can go live with that bus driver you are always shining up to. I called him a liar but I was so mad I didn't care whether he would hit me or not. I started to get up from the bed out of his reach but he slapped me so hard I fell to the floor. I got up and he run around taking all of my clothes out of the closet and bureau and threw them out in the hall and said he was going to throw me out with them. I was afraid he might do me up right so I got out and I haven't had anything to do with him since.

Ethel Friend

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ister taken		have personal knowledge the identity of said witnes	r any m	e to the	of Jul	vs. Complainant
	Vounde	of 1	cause, o	envelop	day o	CLAYTON YOUNGE Respondent.
Examina	Fthel	ed; that fore me	to said	n in an	s	Oral Deposition
I,CATHERINE_MASON, as that the foregoing depositionon Oral Examination	of the witness——and read over to Emvself ——Catherine Meson	at the time and place herein mentioned; that I said witness—or had proom made before me of	f kin	enclose the said Oral Examination in an envelope to the Register	m under my hand and seal, this	Filed 7-12, 1947 Recorded in Record Vol. Page
I, the	of the wi myself	at the time said witness	sel (I er	Given	, Register.

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ETHEL YOUNG	<u> </u>	, Complainant
	vs.	
COT AVENOR VOID	ICP	
- GLALION IOU	ICE establisher projekter general en groepe en projekt (1977) — establisher projekter e	Respondent
This cause coming on t	to be heard was submitted	upon Bill of ComplaintXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
muswer and waiver	and Tes	timony as noted by the Register, and upon
r in said bill.		the Complainant is entitled to the relief prayed
It is therefore ordered, fore existing between the C	adjudged and decreed by omplainant and Defendan	the Court that the bonds of matrimony here- at be, and the same are hereby, dissolved, and
nat the said ETHEL YOUN	CE	is forever divorced from the
CIATEM YOUNGE		for and on account of
Cruelty		
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except to each other until sixt sixty days, neither party shall	y days after the rendition o again marry except to each t the Complainant and Resp	t neither party to this suit shall again marry f this decree, and that if appeal is taken within other during the pendency of said appeal. pondent be, and they are hereby permitted to this suit.
It is further ordered tha	at————————————————————————————————————	
he_Complainant	pay the cost herein to	be taxed, for which execution may issue.
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This day	of July	, 1949
	and the second s	Lidge Circuit Court, In Equity.
		- January Chemic Country In 1941-91
-		Register of the Circui
Ι,	Communication of Control	County, Alabama, do hereby certify that the ct copy of the original decree rendered by the Court in the above stated cause, which said de
	Witness my ha	nd and seal this theday
	of	, 19
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		Register of Circuit Court, In Equity.

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In Circ	uit Court, In Equity
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