

LOUIA ROBERTS WILSON

vs.

WOODROW WILSON

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 _____

Register.

No. 2372

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

LOULA ROBERTS WILSON

vs.

LOUIS ROBERTS WILSON

NOTE OF TESTIMONY

Filed in Open Court this

day of 194.....

OCT 18 1949

WILLIE J. DUCK, Register.

Printed By The Baldwin Times

LOULA ROBERTS WILSON
COMPLAINANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

VS.

IN EQUITY

WOODROW WILSON
RESPONDENT

Now comes the Respondent and accepts service of summons and complaint in this cause.

The Respondent admits the allegations as to ages, residence and marriage, but denies all other allegations contained in the bill of complaint, and demands 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 further notice.

Woodrow Wilson

STATE OF ALABAMA
BALDWIN COUNTY

I, J. M. See, a Notary Public, in and for said County, in said State, hereby certify that Woodrow Wilson, 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 said conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 15 day of October, 1949.

J. M. See
Notary Public, Baldwin Co. Alabama.

COMMISSION TO TAKE DEPOSITIONS

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 LOULA ROBERTS WILSON

as witnesses in behalf of LOULA ROBERTS WILSON in a cause pending in our Circuit Court in Baldwin County, of said State, wherein LOULA ROBERTS WILSON

Complainant
and WOODROW WILSON

Respondent

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

Witness 15 day of October, 194

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 2372

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

LOULA ROBERTS WILSON

Complainant

vs.

WOODROW WILSON

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

FILED
WITNESSES:

OCT 18 1949

ALICE J. DUCK, Register

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

LOULA ROBERTS WILSON

Complainant

VS.

WOODROW WILSON

Respondent

I, LOULA ROBERTS WILSON

as Register and Commissioner

have called and caused to come before me H. M. Hall

witness named in the Requirement for Oral Examination, on the 15 day of October
1949, at the office of H. M. Hall

in _____, Alabama, and having first sworn said Witness _____ to speak the
truth, the whole truth, and nothing but the truth, the said Loula Roberts Wilson

doth depose and say as follows:

My name is Loula Roberts Wilson. I am over twenty-one years of age, and a bona fide resident of Baldwin County, Alabama. The Respondent Woodrow Wilson, is over twenty-one years of age, and a bona fide resident of Baldwin County, Alabama.

The Respondent and I married at Perdido, Alabama, on July 3rd, 1930. We lived together as husband and wife, in Baldwin County, Alabama, until on to-wit, October 1, 1949.

The Respondent for the past _____ years has often threatened and abused me and threatened to do actual violence to my person which would necessarily endanger my life and health. This condition has grown worst from time to time, until now it is absolutely impossible for my to live with him. The conduct of the Respondent is such as to give me every reasonable apprehension to believe and I do actually believe that if I continued to live with him he will carry out his threats and do actual violence to my person which will necessarily endanger my life and health.

The Respondent and I have six children, three of whom are small and the other three are old enough and big enough to take care of themselves. The Respondent and I have agreed that I will have the custody, care and control of the three small children: Georgia Mae Wilson, age 8; Mary Lou Wilson, age 7, and Peggy Ann, age 4. I am fully capable, able and willing to care for these children.

I have for some time considered the matter of a separation and what was to the best interest of the children, and all parties involved and am now to the conclusion that it is to the best interest of all that the Respondent and I separate and secure a divorce.

Loula Roberts Wilson

Alex Walker, a witness for the Complainant, being first duly sworn, deposes and says: My name is Alex Walker. I live, and have lived for some time near, where Mrs. Loula Roberts Wilson and her husband live. I have on several occasions heard the complainant and the respondent fussing, and have on several occasions heard him threaten and abuse her. I have known the complainant and the respondent for some six years, and during the past year year, conditions have grown worst from time to time.

I have often heard them, and it is my opinion based upon my own personal knowledge and observation that the conduct of the respondent is such as to give the complainant every reason to believe that he will carry out his threats toward her and do her bodily harm.

Alex Walker

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 15 day of October, 194 9.

Louise Morris (L. S.)

NO. 2377 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

LOUIA ROBERTS WILSON

vs. Complainant

WOODROW WILSON

Respondent.

Oral Deposition

Filed _____, 194 _____

, Register.

Recorded in

FILED

Record

Vol. OCT 18 1949 Page _____

FILED

Register.

STATE OF ALABAMA ()
BALDWIN COUNTY ()

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Woodrow Wilson, 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 Loula Roberts Wilson, as Complainant and against Woodrow Wilson, as Respondent.

WITNESS my hand this 15th day of October, 1949.

Reese J. Houch
Register

LOULA ROBERTS WILSON	()	IN THE CIRCUIT COURT OF
COMPLAINANT	()	BALDWIN COUNTY, ALABAMA
VS.	()	IN EQUITY
WOODROW WILSON	()	
RESPONDENT	()	

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

Your Complainant Loula Roberts Wilson, respectfully represents
and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent married at Perdido, Alabama,
on July 3rd, 1930, and lived together as husband and wife, until on to-wit,
October 1, 1949.

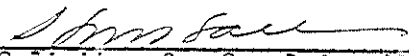
3.

That on October 1st, 1949, and on various occasions prior thereto,
the Respondent threatened and abused the Complainant, and often threatened
to do actual violence to her person which would necessarily endanger her
life and health. The conduct of the Respondent was such as to give the
Complainant every reasonable apprehension to believe and she does actually
believe that if she continued to live with the Respondent he would carry out
his threats and do actual violence to her person which would necessarily
endanger her life and health.

There was born to the marriage between your Complainant and the Respondent three children, Georgia Mae Wilson, age 8, Mary Lou Wilson, age 7, and Peggy Ann, age 4; that your Complainant is the suitable, fit and proper person to have their care, custody and control.

WHEREFORE the premises considered your Complainant prays that your Honor will, by proper process make the said Woodrow Wilson, 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 your Honor will upon a final hearing hereof, award to her a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent; that she be awarded the custody, care and control of the minor children; Georgia Mae Wilson, age 8, Mary Lou Wilson, age 7, and Peggy Ann, age 4; that she be granted such other, further, difference or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for Complainant.

702372

RECORDED

SUMMONS AND COMPLAINT

LOULA ROBERTS WILSON

COMPLAINANT

VS.

WOODROW WILSON

RESPONDENT

FILED

OCT 18 1949

ALICE J. DUCK, Register

DIVORCE DECREE

PRINTED BY MOORE FIG. CO.

The State of Alabama, Baldwin County

Circuit Court, In Equity

LOULA ROBERTS WILSON

, Complainant

vs.

WOODROW WILSON

, 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 LOULA ROBERTS WILSON is forever divorced from the said WOODROW WILSON for and on account of

CRUELTY

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court, That the Complainant be awarded the custody, care and control of the minor children: Georgia Mae Wilson, age 8; Mary Lou Wilson, age 7, and Peggy Ann, age 4.

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 LOULA ROBERTS WILSON

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

This 25th day of October, 1942.

Jeffair 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.

No. 2372 Page 23

The State of Alabama
Baldwin County

In Circuit Court, In Equity

LOULA ROBERTS WILSON

Complainant

vs.

WOODROW WILSON

Respondent

DIVORCE DECREE