

2380

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon James L. Glover 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 Lila S. Glover as Complainant, against James L. Glover, as Respondent.

Witness my hand this 27th day of October, 1949.

W. J. Rusk
Register.

LILA S. GLOVER,

Complainant,

vs.

JAMES L. GLOVER,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the Complainant, Lila S. Glover, and files this her Bill of Complaint for divorce against James L. Glover and shows unto your Honor and unto this Court as follows:

FIRST:

That both your Complainant and the Respondent are over the age of twenty-one years and resident citizens of Baldwin County Alabama, residing at Bay Minette. That your Complainant has been a resident citizen of Baldwin County, Alabama, for more than two years last past.

SECOND:

That your Complainant and Respondent were married on heretofore, to-wit, December 20, 1940, and they have lived together as man and wife until on account of the matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate and apart from him; that on, to-wit, September 17, 1949, the Respondent threatened the life of your Complainant and from his conduct the Complainant had reasonable apprehension that her life or health would be in danger if she continued to live with him; that your Complainant has not lived with such Respondent as his wife since that date.

THIRD:

That prior to her marriage to James L. Glover, your Complainant's name was Lila Mae Skinner and she desires that this Court restore her maiden name at the time of granting such divorce.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Complainant prays that the above named James L. Glover be made a party defendant to this cause by the usual writ or process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the

penalties prescribed by the rules of this Court and the statutes in such cases made and provided; your Complainant prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from said Respondent; that your Honor will also order and decree that her maiden name, Lila Mae Skinner, be restored and that she be allowed to use such name in the future; that your Honor will further order and decree that your Complainant be allowed to remarry if she sees fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further, different and general relief to which she may be entitled and as in duty bound she will ever pray.

Lila S. Glover
Complainant.

STATE OF ALABAMA

BALDWIN COUNTY,

Before me, John Chason, a Notary Public, in and for said State and County, personally appeared Lila S. Glover, who is known to me and who after being by me first duly and legally sworn, says:

That the allegations contained in the foregoing Bill of Complaint are true.

Lila S. Glover

Sworn to and subscribed
before me this 27 day of
October, 1949.

John Chason
Notary Public, Baldwin County,
Alabama.

LILA S. GLOVER,

VS.

JAMES L. GLOVER,

Complainant,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY

TESTIMONY TAKEN IN OPEN COURT
ON OCTOBER 28, 1949

Mrs. Lila S. Glover having been first duly and legally sworn by the Court testified as follows:

ON EXAMINATION

By Mr. John Chason, Attorney

Q. Is this Lila S. Glover?

A. It is.

Q. Are you the complainant in a suit for divorce filed in the Circuit Court of Baldwin County, Alabama in Equity against James L. Glover, the respondent?

A. I am.

Q. Are you and James L. Glover both over twenty-one years of age and resident citizens of Baldwin County, Alabama, residing at Bay Minette?

A. Yes sir.

Q. Have you been a resident citizen of Baldwin County, Alabama for more than two years last past?

A. I have.

Q. Did you and James L. Glover marry on December 20, 1940?

A. We did.

Q. Did you live together as man and wife up until September 17, 1949?

A. We did.

Q. Did you at that time separate from him and have you lived with him as man and wife since that time?

A. I have not.

Q. Now, on September 17, 1949 did James L. Glover threaten your life and from his conduct did you have reasonable apprehension

that if you continued to live with him your life or health would be in danger?

A. I did.

Q. What was your name before your marriage?

A. Lila Mae Skinner.

Q. Do you desire to have that maiden name restored?

A. I do.

Q. Did you and James L. Glover enter into a contract of purchase with W. R. Stuart to purchase the home in which you were living at the time of separation here in Bay Minette?

A. Yes sir.

Q. You do not remember the lot and block number of that property, do you?

A. No, I don't.

Q. Is that the only property that you or James L. Glover either own to the best of your knowledge?

A. It is.

Q. Now, did you and James L. Glover on October 26, 1949 enter into a property settlement by which you paid him fifteen hundred dollars in cash and released him from all claim of alimony and in that settlement did he convey to you his undivided interest in the property described in the contract and in all personal property located in the home or on the land?

A. He did.

Q. That property settlement did not include his automobile and personal effects?

A. No, it didn't.

Q. But the settlement did include everything else?

A. Yes.

Q. Have you paid him fifteen hundred dollars and has he delivered to you an assignment of that contract and conveyance of his interest in the personal property?

A. He has.

Q. That instrument by which you entered into this agreement has been recorded in Baldwin County?

A. Yes sir.

I hereby certify that the above and foregoing is a true and correct copy of the testimony of the Complainant in this cause as given in open court on this 28th day of October, 1949.

Ara S. Nelson
Court Reporter

Lila S. Glover,

Complainant

vs.

James L. Glover,

Respondent

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 and Testimony of Lila S. Glover

and in behalf of Defendant upon _____

David J. Tucker
Hyacinth Bassett Stone
 By *T. H. Tucker* Register.
Secretary for Complaint

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

vs.

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

FILED

OCT 28 1949

Register.

Printed by the **ALICE J. DUCK, Register**

LILA S. GLOVER,

Complainant,

vs.

JAMES L. GLOVER,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes James L. Glover, the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof, says:

FIRST:

That he admits the allegations of the first paragraph of the Bill of Complaint.

SECOND:

That he denies the allegations of the second paragraph of the Bill of Complaint and demands strict proof thereof.

THIRD:

That he admits the allegations of the third paragraph of the Bill of Complaint.

The Respondent hereby accepts service of a copy of the Bill of Complaint filed in the above styled cause and waives notice of the taking of testimony and submission of said cause and agrees that such testimony may be taken and such cause submitted without further notice to him.

James L. Glover

Sworn to and subscribed
before me this 27th day of
October, 1949.

Julian J. Maddox, Jr.
Judge
Register.

2380

ANSWER AND WAIVER

RECORDED

LILA S. GLOVER,

Complainant,

vs.

JAMES L. GLOVER,

Respondent.

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

Filed October 27th, 1949.

Jeffrey J. Mashburn, Jr.
Register.

FILED

OCT 27 1949

ALICE A. DUCK, Register

The State of Alabama, Baldwin County

Circuit Court, In Equity

LILA S. GLOVER

, Complainant

vs.

JAMES L. GLOVER

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confession~~
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 Lila S. Glover is forever divorced from the said James L. Glover for and on account of

- - - - CRUELTY - - - -

It is further Ordered, Adjudged and Decreed by the Court that the property settlement made between the parties by separate instrument is hereby accepted by the Court in lieu of all future claims by either party against the other.

It is further Ordered, Adjudged and Decreed by the Court that the Complainant is hereby granted the privilege of resuming the use of her maiden name LILA MAE SKINNER.

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 Lila S. Glover, the Complainant

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

This 28th day of October, 1949

Jeffrey J. Mathis
 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.

2380

No. _____ Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Complainant
vs.

Respondent

DIVORCE DECREE

FILED
OCT 28 1949
ALICE J. DUCK, Register