

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

SARAH LA COSTE, Complainant

vs.

DONAT LA COSTE, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree/Pro/Confessed~~ 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 Sarah La Coste is forever divorced from the said Donat La Coste for and on account of

Cruelty

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the care, custody and control of the minor child of the marriage, namely Elaine La Coste, is awarded to Sarah La Coste, the complainant.

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 Donat La Coste the Respondent pay the cost herein to be taxed, for which execution may issue.

This 11th day of September, 1950.

Jeffair G. Marshall
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.

RECORDED

No. 7571 Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

SARAH LA COSTE

Complainant

vs.

DONAT LA COSTE

Respondent

DIVORCE DECREE

SARAH LA COSTE

vs.

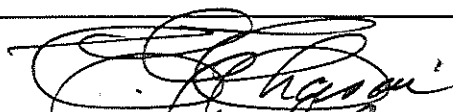
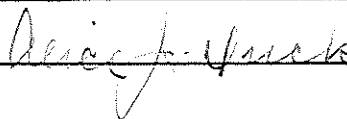
DONAT LA COSTE

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, andTestimony of Sarah La Coste and Nettie Baker Houlsonand in behalf of Defendant upon Answer and Waiver
Subscribed for Complainant

Register.

RECORDED

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

SARAH LA COSTE

vs.

DONAT LA COSTE

NOTE OF TESTIMONY

Filed in Open Court this 7th

day of September, 1947

Register.

Printed By The Baldwin Times

SUMMONS AND COMPLAINT

Baldwin Times

THE STATE OF ALABAMA,

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 2521.....

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon DONAT LA COSTE

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

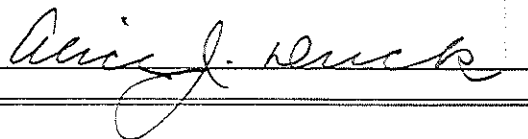
DONAT LA COSTE

....., Defendant

by SARAH LA COSTE

....., Plaintiff.....

Witness my hand this 7th day of August 19 50

 Clerk

No. 2521

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

SARAH LA COSTE

vs.

Plaintiffs

DONAT LA COSTE

Defendants

SUMMONS and COMPLAINT

Filed August 7, 1950

Clerk

C. G. CHASON

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

, 19

, Sheriff

I have executed this summons

this , 19

by leaving a copy with

Sheriff

Deputy Sheriff

SARAH LA COSTE,) (
 Complainant,) (IN THE CIRCUIT COURT OF
 -vs-) (BALDWIN COUNTY, ALABAMA
 DONAT LA COSTE,) (
 Respondent.) (IN EQUITY

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT
 COURT OF BALDWIN COUNTY, Sitting in Equity:

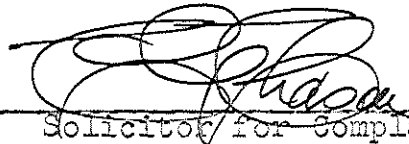
Your complainant, Sarah La Coste, respectfully represents
 and shows unto your Honor:-

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 one year next preceding the
 filing of this Bill of Complaint; that Donat La Coste is over the
 age of twenty-one years and is a resident of Baldwin County, Ala-
 bama.
2. That your complainant and respondent were lawfull married
 on or about, to-wit, April 5, 1921.
3. Your complainant avers and charges that the said respond-
 ent did assault, beat, hit and strike complainant; that said re-
 spondent has committed actual violence on her person attended with
 danger to her life or health; 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 con-
 vinced that he will commit an actual violence upon her person,
 attended with danger to her life or health.
4. Complainant shows that there was born unto your complain-
 ant and respondent of this marriage one child, Elaine La Coste,
 age seven years, which said child is in the custody and control of
 your complainant, and of which said child, complainant desires
 custody and control.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: Your complainant prays that Donat
 La Coste be made a party defendant to this cause by the usual
 process of this Honorable Court requiring him to 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; that upon a final hearing of this cause, that your complainant be granted a divorce from said respondent and that your complainant be granted the custody and control of the minor child hereinabove named. Should your complainant be mistaken in the relief prayed for, that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound, she will ever pray.



Solicitor for Complainant

SARAH LA COSTE,) (
Complainant,) (
-vs-) (
DONAT LA COSTE,) (
Respondent.) (
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the respondent in the above styled cause and waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, respondent says:

1. He admits the allegations contained in Paragraph 1 of said Bill of Complaint.
2. He admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. He admits the allegations contained in Paragraph 4 of said Bill of Complaint.
4. He denies each and every allegation contained in Paragraph 3 of said Bill of Complaint and demands strict proof thereof.

Donat LaCoste
Respondent

Sworn to and subscribed before me,
a Notary Public, on this the 28th
day of August, 1950.

Pearl L. Duncan
Notary Public, Baldwin County
State of Alabama

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

SARAH LA COSTE

Complainant

VS.

DONAT LA COSTE

Respondent

I, Lorna Underwood

as Register and Commissioner in chancery

have called and caused to come before me Sarah La Coste and Nettie Baker Houlsen

witness ES named in the Requirement for Oral Examination, on the 5th day of September
1945, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said Witness ES to speak the
truth, the whole truth, and nothing but the truth, the said Sarah La Coste and Nettie Baker
Houlsen doth depose and say as follows:

TESTIMONY OF SARAH LA COSTE:

My name is Sarah La Coste; I am 49 years of age and a bona fide resident citizen of Baldwin County, Alabama, having resided therein all my life; Donat La Coste is over the age of 21 years and is a resident of Baldwin County, Alabama; we were married on April 5, 1921, and lived together as man and wife until about six weeks ago; many times during our married life, he has beat me, committed other actual violence on my person attended with danger to my life or health; almost every day for the last number of years he has cursed me and threatened to kill me; a short time ago he beat me with a stick; I have been absued and threatened so much that I am afraid for my life if I continue to live with him; we have seven children of our marriage, but all are over the age of twenty-one, and are taking care of themselves, except for Elaine La Coste, who is seven years of age, and who has been in my custody and control since our separation; I have been working and supporting myself since about 1930 and am still able, with the help of my grown children, to maintain a suitable place in which to keep my minor child; I have, therefore, asked the Court to grant me custody and control of her.

Sarah La Coste.

TESTIMONY OF NETTIE BAKER HOULSEN:

My name is Nettie Baker Houlsen; I am over the age of 21 years and a resident of Baldwin County, Alabama; I am personally acquainted with Sarah La Coste and Donat La Coste; I have, on many occasions, heard Donat La Coste curse Sarah and threaten her with all kinds of physical harm; I have known of him beating her on a number of occasions, although I have not actually seen him do it, and have seen marks on her body where she had been beat with sticks and other like objects; they are both over the age of twenty-one years and have been residing in Baldwin County all of their lives; I believe Sarah La Coste to be a fit and proper person to have the custody and control of their minor child, Elaine La Coste.

Nettie Baker Houlsen

ORAL EXAMINATION.

I, Lorna Underwood, as Register and Commissioner hereby certify that the foregoing deposition S on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and C. G. Chason at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; 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 5th day of September, 19450.

Lorna Underwood (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

SARAH LA COSTE

vs. Complainant

DONAT LA COSTE

Respondent.

Oral Deposition

Filed _____, 1945

Register.

Recorded in

Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: LORNA UNDERWOOD

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 Sarah La Coste and Donat La Coste

as witnesses in behalf of Sarah La Coste in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Sarah La Coste is

Complainant
and Donat La Coste

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

Witness 2nd day of September, 194/50

Commissioner's Fee, \$ 5.00

Witness' Fees, \$

Ulice J. French
Register.

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

SARAH LA COSTE

Complainant

VS.

DONAT LA COSTE

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LORNA UNDERWOOD

WITNESSES:

SARAH LA COSTE

NETTIE BAKER HOULSEN

1852