

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

WINNIE NEWBURN BEATY

Complainant

vs.

ROY HUBERT BEATY

Respondent

DIVORCE DECREE

FILED

NOV 16 -1950

ALICE J. DUCK, Register

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Winnie Newburn Beaty

Complainant

VS.

Roy Hubert Beaty

Respondent

I, Lois Paul

as Register and Commissioner

have called and caused to come before me Winnie Newburn Beaty and Addie Pryor.

witnesses named in the Requirement for Oral Examination, on the 3 day of November 1945, at the office of C. LeNoir Thompson in Bay Minette, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said Winnie Newburn Beaty and Addie Pryor doth depose and say as follows:

That my name is Winnie Newburn Beaty, I am over the age of 21, a resident of Baldwin County Alabama and have been more than two years next preceding. My husband, Roy Hubert Beaty is also over the age of 21 and is at present a non-resident of the State of Alabama, in that he abandoned me and left and his whereabouts are now unknown. We were married in Pascagoula Mississippi on March 9, 1949 and lived together as husband and wife in Baldwin County Alabama until April 14, 1950 on or about this day the respondent became abusive and because when in the past he had been using dope of some kind, he abused and mistreated me, I was afraid of him and on this occasion when he grabbed me and started twisting my wrist and my arm and threatening me with such a beating as I had never had, professing it in profane language. I was in fear of my life and health and was afraid to live with him. When the respondent had recovered from his fit of rage he left me and I have not seen him since and I do not know of his whereabouts. The first of these occurrences took place about eight months after we were married and they continued then on frequent occasions until the instance stated following which he vanished. I saw no indication of the use of any drug of him at the time of our marriage and knew nothing of this use until October after our marriage in March but his use was indicated by nervousness before, and quite drugged effect afterwards. When he came out from under the effect of the dope he then went into a rage at the least provoking.

There are no children as fruits of this marriage and there is no property to be divided. I would like to resume my maiden name of Winnie Newburn.

Winnie Newburn Beaty

That my name is Addie Pryor, I know both parties to this cause and know they are both over the age of 21 and have resided in Alabama but I do not know where Roy Hubert Beaty is. They have no children of this marriage and I know that so far as generally known the respondent did not use drug or dope before they married. Some time during the winter after their marriage in March I learned that the respondent was using drugs or dope and I believe him to be dangerous after using drug or dope. I do not feel it safe for her to continue to live with this man.

Addie Pryor

ORAL EXAMINATION.

I, Lois Paul, 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. LeMoire Thompson 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 3 day of November, 1945.

Lois Paul (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

WINNIE NEWBORN BEATTY

vs. Complainant

ROY HUBERT BEATTY

Respondent.

Oral Deposition

Filed 11-15, 1945

Lois Paul Register.

Recorded in

Vol. _____ Page _____ Record _____

Register.

WINNIE NEWBURN BEATY

vs.

ROY HUBERT BEATY

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, AND
oral deposition of Winnie Newburn Beaty and Addie Pryor, and Decree
Pro Confesso.

and in behalf of Defendant upon proof of service by publication

C. L. Davis Thompson
Attorney

Alvin F. Duck

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

WINNIE HOWBURN BEATY

vs.

ROY HUBERT BEATY

NOTE OF TESTIMONY

Filed in Open Court this 15th

day of Nov, 1947

W. J. French
Register.

Printed By The Baldwin Times

STATE OF ALABAMA
BALDWIN COUNTY

You are hereby commanded to summon ROY HUBERT BEATY, 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 WINNIE NEWBURN BEATY, as Complainant, and against ROY HUBERT BEATY, as Respondent.

WITNESS my hand this 30 day of September, 1950.

Alice J. Quick
Register

WINNIE NEWBURN BEATY

Complainant

Vs

ROY HUBERT BEATY

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO HONORABLE TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Your Complainant, Winnie Newburn Beaty, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of twenty-one years of age and a bona fide resident of Baldwin County, Alabama; your Respondent is over the age of twenty-one years and a non-resident of the State of Alabama.

2.

That your Complainant and the Respondent married in Pascagoula, Mississippi on March 9, 1949 and lived together as husband and wife in Baldwin County, Alabama until on to-wit, April 14, 1950.

3.

Your Complainant avers and charges that the said Respondent did on or about the 14th day of April, 1950, 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

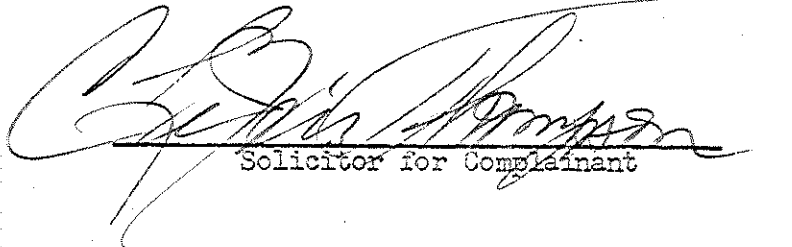
harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

4.

That said Respondent did after the marriage by these parties become addicted to the habitual use of opium, morphine, cocaine or other like drugs.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said ROY HUBERT BEATY, 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.

Your Complainant further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between your Complainant and Respondent, and that upon a final hearing of this cause, that your Complainant be awarded such other further, different or general relief as she may be in equity and good conscience entitled to receive, and the Complainant petitions the use of her maiden name, Winnie Newburn.


Solicitor for Complainant

Recorded 2538

WINNIE NEWBURN BEATY

Complainant

Vs

ROY HUBERT BEATY

Respondent

SUMMONS AND COMPLAINT

FILED

AUG 30 1950

MADE J. BUCK, Registrar

From the law office of
C. LeNoir Thompson
Bay Minette, Alabama

STATE OF ALABAMA)

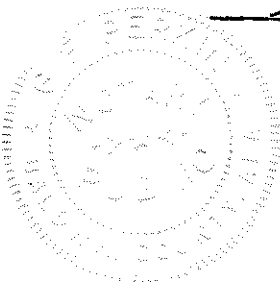
BALDWIN COUNTY)

Before me, the undersigned authority in and for the State of Alabama, Baldwin County, personally appeared Winnie Newburn Beaty, who is known to me and who being by me first duly sworn according to law on oath doth depose and say that she is the Complainant in a certain cause being filed in the Circuit Court of Baldwin County, Alabama; that the Respondent in said cause, Roy Hubert Beaty, is a non-resident of the State of Alabama and whose residence, after a search having been made with due diligence, is unknown according to the best information and belief of the Complainant and that your Complainant can not ascertain the particular place of residence and Post Office address of the Respondent after expending a reasonable effort, which has been made; that said Respondent is over the age of twenty-one years.

Winnie Newburn Beaty
Complainant

Sworn to and subscribed before me
this 1st day of August, 1950.

E. E. Perkins
Notary Public



THE STATE OF ALABAMA, }
Baldwin County }

CIRCUIT COURT, IN EQUITY

No. 2538

Term, 19

WINNIE NEWBURN BEATY

Complainant

Vs.

ROY HUBERT BEATY

Defendant

Motion is hereby made for a Decree Pro Confesso against

ROY HUBERT BEATY

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 3rd day of November, 1950.

746 Code

Solicitor.

Recorded

No. 2538

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

WINNIE NEWBURN BEATY

Complainant _____

Vs.

ROY HUBERT BEATY

Defendant _____

Motion for Decree Pro Confesso
On Publication

Filed 11-3, 1920

W. J. ...
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT, IN EQUITY

No. 2538, Term, 1950WINNIE NEWBURN BEATY

Complainant

Vs.

ROY HUBERT BEATY

Defendant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 31st day of August, 1950, in the Baldwin Times, a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 31st day of August, 1950 and

And it now further appearing to the Register Alice J. Duck, that the said

ROY HUBERT BEATY

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register

that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said ROY HUBERT BEATY

This 3rd day of November, 1950

Alice J. Duck, Register.

Recorded

No. _____ Page _____

THE STATE OF ALABAMA,
Baldwin County

CIRCUIT COURT, IN EQUITY

WINNIE NEWBURN BEATY

Vs.

ROY HUBERT BEATY

Decree Pro Confesso of Publication

Issued 11-3, 1930

Winnie Newburn Beaty
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

The Baldwin Times, Bay Minette, Ala.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Lois Paul

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 Winnie Newburn Beaty and Addie Proyer.

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Winnie Newburn Beaty

Complainant
and Roy Hubert Beaty

Respondent

on oath, to be by you administered, upon Lois Paul
to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 3rd day of November, 194 50.

Alvin F. Wink
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

WINNIE NEWBURN BEATY

Complainant

vs.

ROY HUBERT BEATY

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Lois Paul

WITNESSES:

Winnie Newburn Beaty

Addie Pryor

The **BALDWIN**
Times
ALABAMA'S BEST COUNTY'S- BEST NEWSPAPER
BAY MINETTE, ALABAMA

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA.
BALDWIN COUNTY.

NOTICE TO NON-RESIDENT
WINNIE NEWBURN BEATY, No. 2538
vs.
ROY HUBERT BEATY
The State of Alabama, Baldwin County.
Circuit Court, in Equity -- This the 30th
day of August, 1950.
In this cause it being made to appear
to the Clerk of this Court by the affida-
vit of Winnie Newburn Beaty that the
Defendant, Roy Hubert Beaty is a non-
resident of the State of Alabama, and
further, that, in the belief of said Affi-
dant the Defendant is over the age of 21
years; it is, therefore, ordered that pub-
lication be made in the Baldwin Times
a newspaper published in Bay Minette,
Baldwin County, Alabama, once a week
for four consecutive weeks, requiring Re-
spondent, the said Roy Hubert Beaty, to
answer or demur to the Bill of Complaint
in this cause by the 30th day of Septem-
ber, 1950, or after thirty days therefrom
a decree Pro Confesso may be taken
against him.
ALICE J. DUCK, Register.
C. L. Thompson, Attorney. 32-4tc.

Jimmy Faulkner, being duly sworn, deposes and says
that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper pub-
lished at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Winnie Newburn Beaty
vs. Roy Hubert Beaty

COST STATEMENT

163 WORDS @ 4 1/2 cents --- \$ 7 34

I hereby certify this is correct, due and unpaid (paid).

Jimmy Faulkner
Publisher.

Was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication Aug. 31, 1950 Vol. 61 No. 32

Date of 2nd publication Sept. 7, 1950 Vol. 61 No. 33

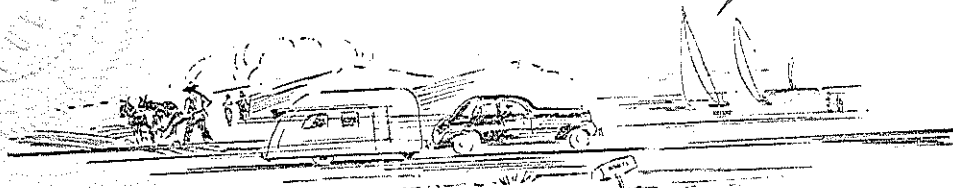
Date of 3rd publication Sept. 14, 1950 Vol. 61 No. 34

Date of 4th publication Sept. 21, 1950 Vol. 61 No. 35

Subscribed and sworn before the undersigned this 21 day of Sept, 1950

Dorothy Martin
Notary Public, Baldwin County.

Jimmy Faulkner
Publisher.



NOTICE TO NON-RESIDENT

TIMES PRINTING CO., BAY MINETTE

WINNIE NEWBURN BEATY

No. 2538

vs.

ROY HUBERT BEATY

The State of Alabama,

Baldwin County.

Circuit Court, in Equity

This the 30th day of

August, 1945

In this cause it being made to appear to the Clerk of this Court by the affidavit of Winnie Newburn Beaty

that the Defendant Roy Hubert Beaty

is a non-resident of the State of Alabama

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Respondent the said Roy Hubert Beaty

to answer or demur to the Bill of Complaint in this cause by the 30th day of September 1945, or after thirty days therefrom a decree Pro Confesso may be taken against him.

Register.