


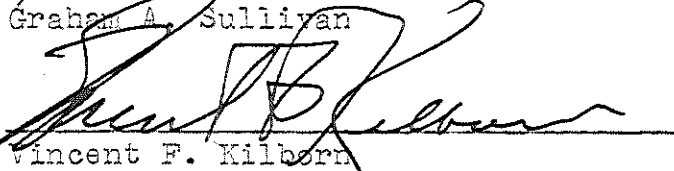
2547

John R. Brunson,  
Complainant,  
vs  
Victoria M. Brunson,  
Respondent.

In the Circuit Court of Baldwin  
County, Alabama.

In Equity No. \_\_\_\_\_

We, the undersigned Solicitors of Record in the above  
entitled cause hereby waive the issuance of a commission in the  
above matter and agree that the testimony taken by Roselle Crabtree,  
commissioner appointed by agreement between counsel, be submitted  
to this Honorable Court for final decree.

  
Graham A. Sullivan  
  
Vincent F. Kilborn

FILED  
JAN 21 1900  
CLERK OF COURT

THE STATE OF ALABAMA, COUNTY OF BALDWIN

JOHN R. BRUNSON,

Complainant,

vs

VICTORIA M. BRUNSON,

Respondent.

IN THE CIRCUIT COURT - IN EQUITY  
AT BAY MINETTE, ALABAMA.

NO. \_\_\_\_\_

DECREE OF DIVORCE

This cause is submitted for decree on the pleadings and testimony as shown by the note of submission on file, and on consideration, it is ordered, adjudged and decreed by the Court that the Complainant is entitled to relief, and that the bonds of matrimony heretofore existing between the Complainant and the Respondent be and the same are henceforth dissolved and annulled.

It is further ordered and decreed that the Complainant and Respondent be, and hereby are permitted to again contract marriage, subject to such provisions of the law as regulate the marriage of divorced persons, and in no event before the expiration of sixty days after the rendition of this decree.

It is further ordered that the Complainant pay the costs of this suit, for which execution may issue.

Dated September 23<sup>rd</sup>, 1958.

Felair J. Madhury, Jr.  
JUDGE -

RECORDED

Final Decree

*Consent of Parties*

1891 Dec 8

Filed 9.23.50  
Ange French  
Register

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

... ..

John R. Brunson,

No. \_\_\_\_\_ VS.

Victoria M. Brunson,

### ORDER OF SUBMISSION

This cause coming on to be heard, is submitted for decree on the pleadings and on the proof as noted.

Dated,

## NOTE OF EVIDENCE

At the hearing of this cause the following note of evidence was taken to wit:

FOR COMPLAINANT

FILED,

9-21-50

Register

Original Bill of Complaint  
Answer, Waiver and Agreement  
Depositions of John R. Brunson and H. W. Kirkland

Solicitor—for Complainant.

FOR RESPONDENT

Solicitor—for Respondent.

**RECORDED**

No. \_\_\_\_\_

John R. Brunson,

Vs.

Victoria M. Brunson,

**ORDER OF SUBMISSION  
NOTE OF EVIDENCE**

**FILED**

Terms, 19 \_\_\_\_\_

SEP 21 1950

, 19 \_\_\_\_\_

ALICE J. DUCA, Registrar

Ent. Min. No. \_\_\_\_\_, Page \_\_\_\_\_

John R. Brunson, the complainant, a witness in his own behalf, being first duly sworn, testified as follows:-

My name is John R. Brunson and I am the complainant in this divorce case now pending against Victoria M. Brunson in the Circuit Court of Baldwin County, Alabama. The respondent and myself are each over twenty-one years of age and each of us is a bona fide resident citizen of the State of Alabama and have been such continuously for a period of more than one year next immediately preceding the filing of the bill of complaint in this cause. I am the lawful husband of the respondent, we having been lawfully married to each other during the year 1935 at Mobile, Alabama. After our marriage we lived together as husband and wife in Mobile, Alabama until I was forced to separate from my wife because of her cruel treatment to me.

This is my second marriage to this same woman. We were first married in 1919 and were divorced in 1931. I did everything in my power to keep our home together at that time but my wife was dissatisfied and it was impossible for me to do anything to please her. She has cursed, threatened, abused and mistreated me ever since we were first married in 1919. I put up with all of this and made every possible effort to keep our home together and bring up our three sons in the proper manner. She went so far as to divorce me in 1931, remarried another man, divorced him and I again married her in 1935 in a further effort to provide a home for her and our children. I have seen no peace since that time. Practically every time I came home my wife would jump on me and scratch me, kick me, bite me, pinch me and beat about my face, head and body with her hands and fists. She cursed and threatened me constantly and told me over and over again on many, many different occasions that she was going to kill me. My wife is a mean woman and she is possessed with a violent and ungovernable temper. Her threats to me became so severe that I actually became afraid of her. In my business it was necessary for me to carry a gun and always when I went in the house I had to take my gun and remove all the cartridges and hide the gun and the cartridges in different places. She threatened me to such an extent that I became afraid to eat anything she cooked and I ate only foods that were already prepared and sealed. I am afraid of this woman because she has already done so much to me that I know if she is

H. W. Kirkland, a witness for the complainant, being first duly sworn, testified as follows:-

My name is H. W. Kirkland and I am over twenty-one years of age and a resident of Mobile, Alabama. I know John R. Brunson, the complainant in this divorce case and his wife, Victoria M. Brunson, the respondent. They are each over twenty-one years of age and each of them is a bona fide resident citizen of the State of Alabama and have been such continuously for a period of more than one year next immediately preceding the filing of the bill of complaint in this cause. I know that they are husband and wife and they lived together as such after their marriage in the State of Alabama.

I have known these people for several years and have been associated with Mr. Brunson in business and have worked with him. I have had occasion to go to their home on numerous different occasions and although I have never seen Mrs. Brunson hit or beat her husband he has told many times of the treatment which he received from her. Also on several occasions I have waited for Mr. Brunson in the car outside his home and have heard fights take place; this happened when were both Police Officers and I was in the scout car with Mr. Brunson and each of us would stop by our homes. Every time we went by his house there was trouble and I did not go into his house because I did not care to be implicated in any of their family arguments or troubles. I could hear the fight clearly from the car however but I do not know what she said to him for she is an Assyrian woman and was speaking to him in some other language that I could not understand what she was saying but I could certainly detect that she was extremely angry with him. Mr. Brunson told me that he was afraid of his wife and he told me that he would not dare leave his gun in the house where she could find it. He also told me that he was afraid to eat anything there. From my observation of these people it is my honest opinion that it would be to Mr. Brunson's best interests to stay away from this woman as he could probably prevent some serious trouble by doing so. I am not related to either party to this cause either by blood or marriage and have no interest in it. I know that Mr. Brunson is a sober, industrious and upright man of good character and I believe that he was a good husband and father.

  
H. W. Kirkland

given the opportunity she will kill me as she has threatened and attempted to do. In her fits of temper she would throw anything she could get her hands on at me and always embarrassed and humiliated me before my neighbors and friends. Some of the men I know who are respectable business men refused to come to my home to visit me and when I asked them why they would not come to my home they stated to me that they did not want to be involved in such carryings on as took place every time I went home and that they certainly did not want to witness a murder or probably be accidentally shot by my wife in her rages of temper.

I have certainly never given my wife any cause or reason whatsoever to treat me in the manner in which she has. I was at all times while we lived together a kind, dutiful, faithful and loving husband to her, faithfully performed my duties to her and our three sons and did everything in my power to make our marriage a success. She would not have it this way however and finally succeeded in driving me away from my home the second time. I was forced to separate from my wife because of the actual violence which she committed on my person and which was certainly attended with danger to my life or health. I do not ever intend to live with her again and I wish this court to grant me an absolute divorce from her and grant me permission to remarry in the event I so care.

John R. Brunner



CERTIFICATE

I, Roselle Crabtree, the commissioner agreed upon in this cause, hereby certify that I, after having first given Graham A. Sullivan as Solicitor for the Complainant and John R. Brunson and H. W. Kirkland, witnesses for the complainant proper notice, did cause and direct them to come before me in the office of Graham A. Sullivan, 307 Van Antwerp Building, Mobile, Alabama on September 16th. and 18th., 1950 respectively, and having had them made known to me, they were by me sworn to speak the truth, the whole truth and nothing but the truth, and in answer to interrogatories propounded to them by Graham A. Sullivan as Solicitor for the Complainant herein, they testified as is hereinabove set out, and their testimony was by me reduced to writing as nearly as might be in the identical language of said witnesses, and having been read over by them and to them by me, they in my presence subscribed their names to said testimony as correct as testified by them. The respondent having failed to answer, plead or demur and having waived notice of the taking of testimony was not present in person or by counsel, no cross-examination was had.

I do hereby certify that I am not of counsel nor of kin to any of the parties to this cause, and I am not in anywise interested in the result thereof.

Dated September 21st, 1950.

Roselle Crabtree

Commissioner -

John R. Brunson,  
Complainant,  
vs  
Victoria M. Brunson,  
Respondent.

In the Circuit Court of Baldwin  
County, Alabama.

In Equity

No. \_\_\_\_\_

TO THE HONORABLE JUDGES OF SAID COURT, SITTING IN EQUITY:-

1. Complainant avers that he and respondent are each over twenty-one years of age and that each of them is a bona fide resident citizen of the State of Alabama and have been such for a period of more than one year next immediately preceding the filing of this bill of complaint.

2. Complainant avers that he is the lawful husband of the respondent, they having been lawfully married to each other during the year 1935 at Mobile, Alabama.

3. Complainant avers that respondent has committed actual violence on his person attended with danger to his life or health or that from her conduct towards him there is reasonable apprehension of such violence, that he has separated from her bed and board for this reason and remains so separated.

PRAYER FOR PROCESS

Complainant prays that upon the filing of this bill of complaint that proper process issue to Victoria M. Brunson making her a party respondent and requiring her to appear and plead, answer order to the allegations thereof within the time required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant prays that upon the final hearing hereof that your Honors will grant to him an absolute divorce from the respondent and grant him permission to remarry in the event he should so care.

John R. Brunson  
Complainant

Richard S. Ullian  
Solicitor for the Complainant -

STATE OF ALABAMA

COUNTY OF MOBILE

This agreement between John R. Brunson and Victoria Brunson is as follows:

1) The parties are husband and wife and have separated. The husband has filed or is preparing to file in the Circuit Court of Baldwin County, Alabama a bill for divorce from the wife. The wife will file an answer and waiver of notice in such proceedings passively resisting the suit for divorce. The wife will surrender all claims for alimony against the husband on the terms hereof.

2) The husband surrenders, remises, releases and quits claims to the wife any and all his right, title, interest or claim to any property acquired by the two of them jointly, or individually, during the marriage between them, whether that property be real, personal or mixed and regardless of where located, excepting the personal clothing and firearms belonging to the husband which he retains and may remove within five days from this date.

3) The wife accepts the foregoing transfer to her in full settlement of all claims for alimony against the husband. The husband will pay all costs incurred in such divorce proceedings and all his own counsel fees.

4) This agreement is made subject to approval thereof by the Court and the provisions thereof may be incorporated into any court decree in the husband's said suit.

Executed in triplicate this 5<sup>th</sup> day of September, 1950.

Victoria M. Brunson (SEAL)

John R. Brunson (SEAL)

STATE OF ALABAMA  
COUNTY OF MOBILE

I, Francis Hart, a Notary Public in and for said State and County hereby certify that John B. Brunson, and Victoria Brunson, husband and wife, whose names are signed to the foregoing instrument and conveyance and who are known to me, acknowledged before me on this day that, being informed of the contents of the within instrument and conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal this 5<sup>th</sup> day of September, 1950.

Francis Hart  
Notary Public, Mobile County, Alabama.

JOHN R. BRUNSON

Complainant

No.

Vs.

VICTORIA BRUNSON

Defendant

IN THE CIRCUIT COURT OF BALDWIN  
~~MOBILE~~ COUNTY, ALABAMA  
IN EQUITY

ANSWER AND WAIVER

Comes the Defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegation of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

WITNESS:

*[Signature]*  
Attorney for Defendant

*Victoria M. Brunson*  
Defendant.

STATE OF ALABAMA

COUNTY OF MOBILE

I, \_\_\_\_\_, a NOTARY PUBLIC in and for said State and County, do hereby certify that Victoria Brunson, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, she executed the same voluntarily on the day same bears date.

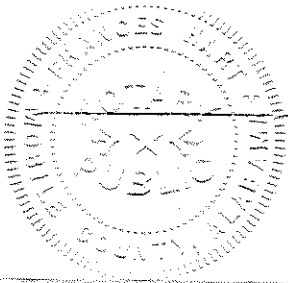
Witness my hand and seal this 5<sup>th</sup> day of September, 1950.

Filed, JAMES A. CRANE, REGISTER.

*Francis Hart*  
NOTARY PUBLIC

STATE OF Alabama

COUNTY OF Mobile



675204

2152

RECORDED

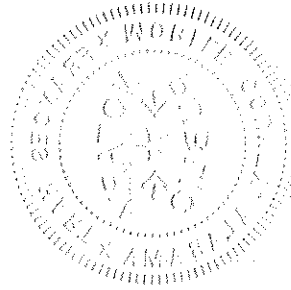
No. \_\_\_\_\_

VS.

ANSWER AND WAIVER

Filed \_\_\_\_\_, 19\_\_\_\_

Register.



FILED  
SEP 15 1950  
ALICE J. DUCK, Register