The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

WILLA_D	Ean Reid	, Complainant
	vs.	
SAMES	REID	, Respondent
		The state of the s
		ll of Complaint, Decree Pro Confesso on
Answer and Walver	and Testimo	ny as noted by the Register, and upon con-
		ant is entitled to the relief prayed for in
said bill.		
It is therefore ordered adjudged	and decreed by the Con-	t that the bonds of matrimony heretofore
		me are hereby dissolved, and that the said
$\mathcal{A}^{\mathcal{C}}$		
MILLA DEAN KE	<u> </u>	is forever divorced from the
said JAMES REID		for and on account of
cruelty. This cause c	oming to be hear	d was submitted woon an
	. 1957. entered	into between the parties and
public, and the same bei	ng considered an	d understood and the Court :
or the opinion that the	agreement should	
		nt the sum of ONE HUNDRED &
09/100 DOZZLĀS (\$200.cc)	-per monthⁱ for t	he support of the two chillds
namely: JERRY BART, age	4, and WILLIAM D	AVID. age 2½; that complains
shall have custody of the	e said JERRY BAR	I and WILLIAM DAVID REID, w
		m at weesoneble times.
		earty to this suit shall again marry except
		and that if appeal is taken within sixty
days, neither party shall again marry e	xcept to each other durin	g the pendency of said appeal.
It is futher ordered that the Com	iplainant and Respondent	t be, and they are hereby permitted to
again contract marriage upon payment		
		REID
theKespondeng	pay the cost herein to	be taxed, for which executed may issue.
This 30 =	August	10. 57
-		1921 •
er ja sa maninin saara sarahan angan ja mana ya mananan sarahan sa manan sa manan sa manan sa manan sa manan s		let miface
		Judge Circuit Court, In Equity.
I,	•	, Register of the Circuit
	Court of Baldwin Count	ty, Alabama, do hereby certify that the
		opy of the original decree, rendered by the
	decree is on file and en	urt in the above stated cause, which said rolled in my office.
	Witness my hand	and seal this theday
	of	, 19
		Register of Circuit Court, In Equity.
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No. Page....

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant
vs.

Respondent

DIVORCE DECREE

FILED

AUG 20 1957.

MAGE L. MICK; PROJECT

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No.
The State of Alabama,
IN EQUITY CIRCUIT COURT OF BALDWIN COUNTY
vs.
NOTE OF TESTIMONY
Filed in Open Court this
AUG 20 1957 Register.
ALIABOR PAGISET

THE STATE OF ALABAMA Baldwin County

Circuit Court

TO:

Kathryn Sute

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine

Willa Dean Reid

Gladys Peterson

a witness in behalf of Complainant

Circuit Court in Baldwin County, of said State, wherein

in a cause pending in our

the Complainant

WILLA DEAN REID

, Complainant

and

JAMES REID

Respondent

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

Witness 9th day of August

, 1957

Register

Commissioner's Fee, \$

Witness' Fees, \$

AGREEMENT

STATE OF ALABAMA,
BALDWIN COUNTY.

This agreement made and entered into on this the 1st day of August 1957, by and between JAMES REID, hereinafter referred to as the party of the first part, and WILLA DEAN REID, hereinafter referred to as the party of the second part:

Witnesseth:

Whereas, said parties hereto have been husband and wife for a period of four years, and as a result of such union have two children, JERRY BART, age 4, and WILLIAM DAVID, age $2\frac{1}{2}$, and whereas said parties have definitely concluded that under conditions now existing it is impracticable for them to live together as man and wife,

Now, therefore, in consideration thereof, and of the mutual agreements hereinafter made, they have mutually agreed to a complete separation under the following express terms and conditions:

- 1. The said parties shall entirely and completely separate as man and wife, live separate and apart, and neither party hereafter shall in any way harass, threaten, intimidate, or otherwise act in any way so as to embarrass or humiliate the other party.
- 2. The party of the second part shall have the custody and control of the two children named above with the right of the party of the first part to visit said children at all reasonable times.
- 3. That the party of the first part agrees to furnish support for the said two children of not less then \$100.00 per month.

It is further understood and agreed that under such conditions, the court thereafter shall reserve and maintain its right in the interest of the welfare of the children to make such changes in reference to the custody, control and support of the children as the court may determine, after proper hearing with due notice, is in the best interests of the children.

This agreement has been made and executed by the parties hereto on the day and date hereinabove first set forth, in good faith, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.

Willa Dean Reid

STATE OF ALABAMA,
BALDWIN COUNTY.

I, the undersigned, a notary public in and for said County and State, hereby certify that James Reid, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before me on this day that, being informed of the contents of the agreement, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 1st day of August, 1957.

Affix Seal:

Allien C Epperson Notary Public

July Elle 11/2

STATE OF ALABAMA,)
BALDWIN COUNTY.)

I, the undersigned, a notary public in and for said County and State, hereby certify that Willa Dean Reid, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before me on this day that, being informed of the contents of the agreement, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 1st day of August, 1957.

Affix Seals

AGREEMENT

WILLA DEAN REID

AND

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JAMES REID

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ANSWER AND WAIVER

STATE O	F ALABAMA,)	
BALDWIN	COUNTY.)	
WILLA D	EAN REID,	>
	Complainant	IN THE CIRCUIT COURT OF
٧.	and the second s	BALDWIN COUNTY, ALABAMA
james r	EID, Respondent) IN EQUITY

Somes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; 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 theretofore 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 denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof thereof.

4. He admits the allegations contained in paragraph 4 of said bill of complaint.

Respondent

Solicitor for Respondent

A proposation of the contract of

ALLEE L. BECK, Register

THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

•	Wilha Dean Reid		Complainant
	James Reid	VS.	Respondent
I,	Kathryn Sute		
•	and Commissioner and caused to come before me		lla Dean Reid and adys Petersen
	an opposition protession and the contract of t		
in Fol- truth, the w	еу , Alabama, and	d hav ruth,	Examination, on the

I married James Reid on March 14, 1953, at Pine Bluff, Arkansas. We moved to Baldwin County and have lived at Lillian, Alabama for over twenty months. On June 19th, and again on Saturday, July 20, 1957, my husband had been drinking, and he flew into a rage and beat me up so that I had black and blue marks all over my body. My husband has committed actual violence on my person, and because of his violent rage and the numerous times that he has struck and beat me, I fear for danger to my life and health.

GLADYS PETERSEN, FIRST BEING DULY SWORN, DEPOSES AND SAYS AS FOLLOWS:

My name is Gladys Petersen. I live near Lillian, Blabama. Willa Dean Reid and James Reid rent a house from us, which is about 150 feet from our house. Mr. and Mrs. Reid have lived in our house since Christmas of 1955. On several occasions I know Mr. Reid would get into a fight with his wife. Since they lived so nearby I knew that her husband was hitting her on the body and face. He admitted this to me later. Also, Mrs. Reid came to my house for protection. She was black and blue on her arms, shoulder and face. He also said that he was trying to "Knock some sense into her". Mrs. Reid was afraid to be home at night because she feared her husband.

Gladys Petersen

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I, <u>Kathryn Sute</u>	-, as Register and	Commissioner	hereby certify
that the foregoing deposition S on Oral Examina	tion was taken dov	vn by me in writ	ing in the words
of the witness es and read over to them	_and_they_sign	ed the same in	the presence of
myself and Forest A. Christian	α_ : ::::::::::::::::::::::::::::::::::	· · · · · · · · · · · · · · · · · · ·	
at the time and place herein mentioned; that	I have personal kr	nowledge of per	sonal identity of
said witness as or had proom made before me	of the identity_of_sa	uid witness ©S	that I am not of
counsel or of kin to any of the parties to said	cause, or any mann	er interested in	the result thereo

Given under my hand and seal, this 9th day of August, 194 57

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I enclose the said Oral Examination in an envelope to the Register of said Court.

Hatteyne Sete (L. S.)

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		Lio:	Respondent.	Complainant		EQUITY	АМА
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BILL OF COMPLAINT

STATE OF ALABAMA,)	
BALDWIN COUNTY.)	
WILLA DEAN REID,)
Complainant) IN THE CIRCUIT COURT OF
V.	BALDWIN COUNTY, ALABAMA
	IN EQUITY
JAMES REID, Respondent	

To the Honorable H. M. HALL, Judge of the Circuit Court of Baldwin County,

Sitting in Equity:

Your complainant, Willa Dean Reid, respectifully represents and shows unto your Honor:

- 1. That complainant is over the age of twenty-one years and is a resident citizen of said State and County, and has been a bona fide resident citizen of said State and County for more than one year next preceding the filing of this bill of complaint; that James Reid is over the age of twenty-one years and resides in Baldwin County, Alabama.
- 2. That you complainant and respondent were lawfully married on or about, to-wit, March 14, 1953, at Pine Bluff, Arkansas.
- 3. Your complainant avers and charges that the said respondent did on or about the 19th day of June, 1957, 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. There were born to said marriage two children, JERRY BART, age 4, and WILLIAM DAVID, age 2½; That your complainant is a person of good moral character, and is capable of keeping custody of said children; and that it will be to the best interest and welfare of the children to be in the custody of your complainant, their mother.
- 5. The parties have entered into an agreement for the maintenance, care, custody and support of the children, which agreement is attached hereto and marked Exhibit A.

The premises considered, your complainant makes the said James Reid a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said James Reid, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray, etc.

olicitor for Petitioner