

2894

BARBARA LAVENE KNIGHT
COMPLAINANT
VS
WILLIAM F. KNIGHT
RESPONDENT

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

NOW comes the Respondent William F. Knight, and respectfully represents and shows unto Your Honor as follows:

1.

That on September 16, 1952, a decree of divorce was granted by your Honor in the above styled cause granting to the Complainant a divorce from the Respondent.

2.

That in and by the terms of said decree the Complainant, Barbara Lavene Knight, was awarded the care, custody and control of the daughter, Barbara Jane Knight, subject to certain conditions.

3.

That the Complainant, Barbara Lavene Knight took the said child with her to Mobile where she resided momentarily with a sister of the Complainant; that the Complainant abandoned the minor child, Barbara Jane Knight, and left her with her sister Mary Williams, who lives in Mobile.

4.

That the Said Mary Williams wrote to the mother of the Respondent to ask the Respondent to come to Mobile and get the child as the Complainant Barbara Lavene Knight was not living a proper life and that she had refused to let her remain in the home with her.

5.

That the Respondent immediately upon getting word went to Mobile and got the said minor child and brought her to Bay Minette where she is now living in the home of the mother of the Respondent.

6.

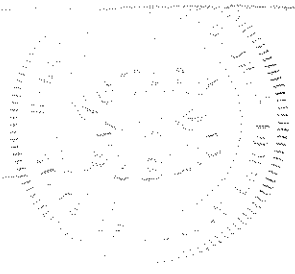
That the mother of the Respondent, Mrs. Mary B. Knight, is a suitable, fit and proper person, and is willing to care for the child for the Respondent.

WHEREFORE, the premises considered, your Petitioner prays that the decree heretofore rendered in this cause be amended and modified so as to award the permanent care, custody and control of the said minor child, Barbara

Jane Knight to the Respondent, your Petitioner, William F. Knight.

William F. Knight

Sworn to and subscribed before me on this the 29 day of December, 1952.



Henry J. Wilkins, Jr.
Notary Public, Baldwin County, Alabama

557 August 24

28914

BARBARA LAVETT KIGHT
COMPLAINANT

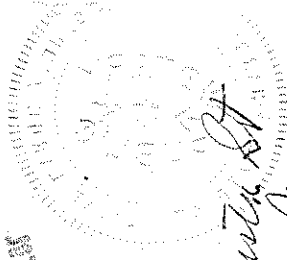
VS

WILLIAM F. KIGHT
RESPONDENT

FILED

1-6-53

Alice J. Cook, Register



557 August 27
Mobile, Ala

BARBARA LAVIERNE KNIGHT
Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

-VS-

IN EQUITY

WILLIAM F. KNIGHT
Respondent,

NO. 2894

ORDER

WHEREAS the Respondent in the above mentioned cause has filed a petition praying that the Court will modify the decree rendered on the 16th. day of September, 1952;

It is hereby ORDERED, ADJUDGED, AND DECREED, that this petition be set for hearing at 2:00 PM on the 15th day of *January, 1953* at the Court House in Bay Minette, Alabama, and that a copy be served on the Complainant, Barbara Lavene Knight, notifying her of this hearing.

Done this the 8th day of *January, 1953*.

Telclair J. Mashburn, Jr.
TELCLAIR J. MASHBURN, JR.
JUDGE OF THE CIRCUIT COURT,
Baldwin County, Alabama

CD 47
7702894
449

10/1
[Handwritten signature]

BARBARA LAVENE KNIGHT
COMPLAINANT

557 Augusta
Mobile, Ala

-VS-

WILLIAM F. KNIGHT
RESPONDENT

NO. 2894

O R D E R

Filed 1-8-53
A. J. [Signature]

Received 9th Day of January 1953
and on 12th Day of January 1953
I served a copy of the within order
on Barbara Lavene Knight
by service on _____

W. H. HOLCOMBE, Sheriff

By R. H. Matthews D.S.

Received in Sheriff's Office
this 9th day of January, 1953
TAYLOR WILKINS, Sheriff

Barbara Lavene Knight

vs.

William F. Knight

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Plaintiff upon the original Bill of Complaint, Answer and waiver of Respondent, agreement of both parties, and testimony of Barbara Lavene Knight and Elizabeth Pollard

and in behalf of Defendant upon

[Handwritten signature]

[Handwritten signature]

Register.

11

No. 2894

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Barbara Lavene Knight

vs.

William F. Knight

NOTE OF TESTIMONY

Filed in Open Court this 16

day of Sept, 1942

Archie J. Leach
Register.

BARBARA LAVERNE KNIGHT

COMPLAINANT

VS

WILLIAM F. KNIGHT

RESPONDENT

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

Now comes Mrs. Mary B. Knight, the paternal grandmother of Barbara Jane Knight, and respectfully represents and shows unto Your Honor as follows:

1.

That on September 16, 1952, a decree of divorce was granted by this Honorable Court in the above styled cause to the Complainant from the Respondent.

2.

That in and by the terms of said decree the Complainant, Barbara Laverne Knight, was awarded the care, custody and control of the daughter, Barbara Jane Knight, subject to certain conditions.

3.

That the Complainant, Barbara Laverne Knight, took the said child with her to Mobile where she resided momentarily with a sister of the Complainant; that the Complainant abandoned the minor child, Barbara Jane Knight, and left her with her sister, Mary Williams, who lived in Mobile.

4.

That the said Mary Williams asked the mother of the Respondent, your Petitioner, to ask the Respondent to come to Mobile and get the child as the Complainant, Barbara Laverne Knight, was not living a proper life and that she was not living in the home with her and very seldom came to see the child.

5.

That the Respondent, immediately upon getting word, went to Mobile and got the said minor child and brought her to Bay Minette to your Petitioner's home.

6.

That on January 8, 1953, the Respondent filed a petition in this Honorable Court to have the original decree amended and modified so as to award the permanent care, custody and control of the child, Barbara Jane Knight, to the Respondent. The Petitioner also averred that the mother of the Respondent, your Petitioner, Mrs. Mary B. Knight, was the suitable, fit and proper person and was willing to care for the child for the Respondent.

7.

That on January 15, 1953, the case was set down for a hearing on the aforesaid petition and then and there the court awarded temporary custody to the paternal grandmother, Mrs. Mary E. Knight, your Petitioner.

8.

That thereafter the said child, Barbara Jane Knight, remained at the home of your Petitioner under her care and control until June 7, 1954, at which time the Complainant asked your Petitioner to allow her to take the child on a short visit to Mobile. The Complainant was allowed to take the child with the understanding that she would be returned within a few days to the home of your Petitioner. The Complainant has failed and refuses to return the said child, Barbara Jane Knight, to your Petitioner, its paternal grandmother, Mrs. Mary E. Knight, in whose custody the child was awarded by this Honorable Court.

9.

That your Petitioner has been informed and believes that the said child has not and is not being properly cared for since the Complainant has taken the child from your Petitioner's home.

10.

Further that your Petitioner has been informed and believes the child is now in poor health and is not being properly cared for by a physician or the Complainant, and that the Complainant is not a fit and proper person to care for the said child. And further that the health and safety of the child is endangered.

11.

That it is to the best interest of the child Barbara Jane Knight that she be returned to your Petitioner, Mary E. Knight.

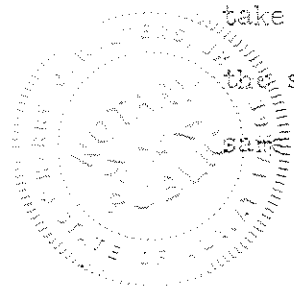
12.

That your Petitioner believes that the Complainant will secrete and remove the said child from the State of Alabama.

WHEREFORE, the premises considered, your Petitioner prays that this Honorable Court will issue an order directing the Sheriff of any County to take into his custody the said minor child, Barbara Jane Knight, and deliver the same to the Sheriff of Baldwin County, Alabama, and that he deliver the same to the said paternal grandmother, Mrs. Mary E. Knight.

Sworn to and subscribed before me on this the 13 day of July, 1954.

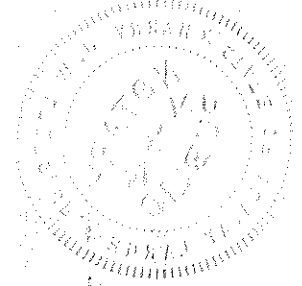
Mary E. Knight
Walter J. Wilton
Notary Public, State of Alabama at Large



Received in this Office
this 13 day of July, 1954
TAYLOR WILKINS, Sheriff

MD 2894

926



EXECUTED
This 13 day of July, 1954
by serving a copy of the within on
Barbara Baverne Knight
W. H. HOLCOMBE, Sheriff
By W. E. Caniff D. S.

FILED
JUL 13 1954

ALICE J. DOCK, Register

Complainant's address is
Les Williams
556 Augusta St.
Mobile, Ala.

[Handwritten notes and signatures in the bottom right corner, including a signature that appears to be 'Alice J. Dock']

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Barbara Lavene Knight

Complainant

VS.

William F. Knight

Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Barbara Lavene Knight and Elizabeth Pollard

witness^{es} named in the Requirement for Oral Examination, on the 16 day of September
19452, at the office of Hubert M. Hall
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 Barbara Lavene Knight and Elizabeth
Pollard doth depose and say as follows:

My name is Barbara Lavene Knight. I am 19 years of age and a resident of Baldwin County, Alabama. I am the wife of the Respondent, William F. Knight, who is a resident of Baldwin County, Alabama, and over twenty-one years of age.

We married in Lucedale, Mississippi, on February 9, 1950, and we lived together as husband and wife until Sunday September 7, 1952, at which time because of the treatment of the Respondent I abandoned living with him.

The Respondent while we were living together as husband and wife threatened and abused me and threatened to do actual violence to my person which would necessarily endanger my life and health. The conduct of the respondent was such as to render it absolutely impossible for he and I to live together as husband and wife. I have considered the matter and I am to the positive conclusion that we cannot make a go of it as husband and wife.

The Respondent and I have one child, Barbara Jane Knight, now 19 months of age. We are not in accord to whom the custody of the child should be awarded and for that reason have agreed to submit the matter to the court for a decree as to the custody of the said child.

Barbara Lavene Knight

My name is Elizabeth Pollard. I am a maternal Aunt of the Complainant. I have known the Complainant all of her life. The Complainant has told me about the conditions surrounding her living with the Respondent as his wife, and after considering everything and from my own personal observation I am of the opinion that it is to the best interest of both that they be granted a divorce and each be permitted to go her or his respective way.

Mrs. Elizabeth Pollard

ORAL EXAMINATION.

I, Evelyn Watts, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition 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 Hubert M. Hall

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 16 day of September, 194 52.

Evelyn Watts (L. S.)

NO. 2494 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Barbara Lavene Knight

vs. Complainant

William F. Knight

Respondent.

Oral Deposition

Filed _____, 194 _____

Register.

Recorded in

Record

Vol. _____ Page _____

Register.

BARBARA LAVENE KNIGHT
COMPLAINANT
VS
WILLIAM F. KNIGHT
RESPONDENT

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

Now comes the Respondent in his own proper person and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to residences, ages and marriage but denies all allegations as to cruelty and demands strict proof of the same.

The Respondent admits that the parties hereto have a child, Barbara Jane Knight, 19 months old, but denies that the Complainant is a suitable, fit and proper person to have her care, custody and control and on the contrary says that he is the proper person to have the care, custody and control of said minor child.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

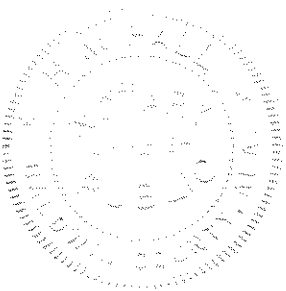
William Francis Knight

STATE OF ALABAMA
BALDWIN COUNTY

I, [Signature], a Notary Public, in and for said County, in said State, hereby certify that William F. Knight, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that being informed of the contents of said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 12 day of September, 1952.

[Signature]
Notary Public, Baldwin County, Alabama



RECORDED

702594

BARBARA LAVENE KNIGHT

COMPLAINANT

VS

WILLIAM F. KNIGHT

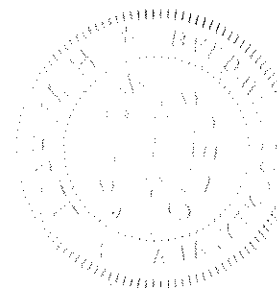
RESPONDENT

ANSWER AND WAIVER

FILED

SEP 16 1952

ALICE J. DUCK, Register



COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Evelyn Watts

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 Barbara Lavene Knight and Elizabeth Pollard

as witnesses in behalf of Complainant. in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Barbara Lavene Knight

Complainant.
and William F. Knight

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

Witness 16 day of Sept, 1952

Alvin A. ...
Register.

Commissioner's Fee, \$ _____
Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Barbara Lavene Knight

Complainant—

vs.

William F. Knight

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Evelyn Watts

FILED

SEP 16 1962

WITNESSES:

Barbara Lavene Knight Register

Elizabeth Pollard

BARBARA HAVERNE KNIGHT

COMPLAINANT

VS

WILLIAM F. KNIGHT

RESPONDENT

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

This cause coming on to be heard upon the sworn petition of Mrs. Mary B. Knight, the paternal grandmother of Barbara Jane Knight, a minor, and that it appearing to the court that the said custody of the child has been awarded to Mrs. Mary B. Knight, by this court and it further appearing to the court that it is to the best interest of the child that she be returned to the paternal grandmother, Mrs. Mary B. Knight.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the Sheriff of Baldwin County, Alabama, or any sheriff of any county in which the minor child, Barbara Jane Knight, can be found, forthwith take the said child into their care and custody and deliver her to the Sheriff of Baldwin County, Alabama, who should deliver her to the paternal grandmother, Mrs. Mary B. Knight.

IT IS FURTHER ORDERED that a copy of this order should be the authority of any sheriff of any county to whom these orders be committed for the actions in the premises.

Done in Bay Minette, Alabama, this _____ day of July, 1954.

JUDGE

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Barbara Lavene Knight, Complainant

vs.

William F. Knight, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso 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 Barbara Lavene Knight is forever divorced from the

said William F. Knight for and on account of

Cruelty. IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Complainant Barbara Lavene Knight, be and she is hereby awarded the care, custody and control of the daughter, Barbara Jane Knight, with the provision that the father shall have the right to visit the child at all reasonable and proper times and shall have the right to have the child visit him in his home on two week-ends a month and that after Barbara Jane Knight reaches the age of five years the father shall have the right to have said child spend the summer vacation with him, the court to retain jurisdiction.

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 William F. Knight the Respondent pay the cost herein to be taxed, for which execution may issue.

This 16th day of September, 1952.

Jeffrey J. Masbury, Jr. 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.

No. 2894 Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Barbara Labene Knight

Complainant

vs.

William F. Knight

Respondent

DIVORCE DECREE

FILED
SLP
MAR 18 1952

ANSWER AND CROSS BILL

BARBARA LAVERNE KNIGHT

COMPLAINANT

VS

WILLIAM F. KNIGHT

RESPONDENT

NO. 2894

IN EQUITY

BALDWIN COUNTY, ALABAMA,

IN THE CIRCUIT COURT OF

Comes now Mrs. Mary B. Knight, and for answer to the Complainant's

petition says:

1. She admits the allegations in Section 1.

2.

She admits the allegations in Section 2.

3.

She admits the allegations in Section 3.

4.

She ~~admits~~ the allegations in Section 4.

admits

5.

She denies the allegations in Section 5.

6.

She denies the allegations in Section 6.

7.

She denies the allegations in Section 6.

8.

She admits the allegations in Section 8.

9.

She admits the allegations in Section 9, except that when the Petitioner left the Knight home on 7 June, 1954, it was understood that she would take

a short visit to her kinsmen and return the infant to the Knight home at that time.

10.

The Respondent denies the allegations of Section 10 and says that the

Petitioner was contacted several times prior to July 13, 1954, and requested to bring Barbara Jane back to the Knight home.

11.

She denies the allegations of Section 11. She says she is 53 years old and in excellent health. That she lives in a comfortable home and in a christian environment.

12.

The Respondents admits that the petitioner is the mother of Barbara Jane Knight; neither admits or denies the amount of Complainant's salary; but specifically denies that she has a suitable home in which to rear Barbara Jane Knight. The Respondent avers that the Petitioner is not a suitable person to be entrusted with the care of Barbara Jane, that she has not shown the child the proper attention or affection and that she lives an immoral life.

Now having fully answered Complainant's petition, the Respondent comes now and by way of cross petition says:

A.

That on January 15, 1953, this Honorable Court awarded temporary custody of Barbara Jane Knight, to her paternal grandmother, Mrs. Mary B. Knight, your cross petitioner.

B.

That Mrs. Mary B. Knight is a fit and proper person to be entrusted with the care, custody and control of Barbara Jane, that she maintains a comfortable christian home in an excellent community. That the infant has spent a great portion of her life in the Knight home and is well adjusted to it. That she is physically and financially able to care for the child.

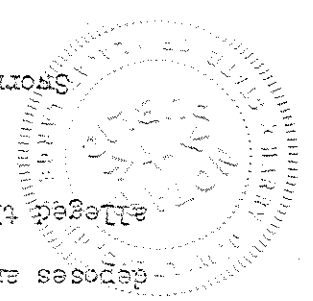
C.

The cross Petitioner avers that the Complainant has not given Barbara Jane the love and attention she needs. That when the Petitioner had custody of Barbara Jane she left her with other members of her family and with strangers for long periods of time. That the Complainant's associates are unruly, she uses vulgar language in the presence of Barbara Jane and she leads an immoral life.

ALICE L. BRICK, Registrar
7-18-54
FILED

Walters & Brantley
by: Jackson M. Brantley
Solicitor for Respondent and
Cross Petitioner.

Mary B. Knight
Notary Public, Baldwin County, Alabama
Sworn to and subscribed before me this 16 day of August, 1954.



alleged therein are true and correct.
deposes and says: I have read the foregoing cross petition and the facts
the foregoing petition and who is known to me and who, being first duly sworn,
and State, personally appeared Mrs. Mary B. Knight, whose name is signed to
Before me, Harry J. Walters, Jr., a Notary Public, in and for said County

BALDWIN COUNTY
STATE OF ALABAMA

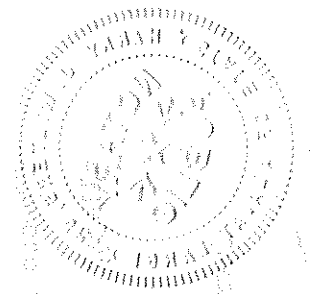
Mary B. Knight
Petitioner

and different relief to which she may be in the premises entitled.
Barbara Jane Knight. Cross Petitioner prays for such other, further, general
tioner, Mrs. Mary B. Knight, the permanent care, custody and control of
the final hearing of this cause, will enter an order giving your Cross Peti-
Premises considered, your Cross Petitioner prays that your Honor, upon
law and the practice of this Honorable Court.
demur to the same within the time and under the penalties prescribed by
respondent to this bill of complaint requiring her to plead, answer or
Honor will by proper process make the said Barbara Lavene Knight party
WHEREFORE, the premises considered, your Complainant prays that your
of the custody of Barbara Jane.
their homes, and status in life or otherwise that would warrant a change
That there has been no change in the Complainant and the Respondent,

Received 18 day of Aug 1954
and on _____ day of _____
I served a copy of the within _____
on _____
By service on _____
By TAYLOR WILKINS, Sheriff

28 7/1/54

BARBARA LAVERNE KNIGHT
COMPLAINANT
VS
WILLIAM F. KNIGHT
RESPONDENT



Received _____ day of _____
and on 19 day of Aug 1954
I served a copy of the within _____
on _____
By service on J. J. Markbunge
By Taylor Wilkins, Sheriff
D.S.

ANSWER AND CROSS BILL

*Serve on
Hon. J. J. Markbunge*

FILED.
AUG 18 1954
ALICE I. DUCK, Register

BARBARA LAVERNE KNIGHT

PLAINTIFF

WILLIAM P. KNIGHT

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

This cause coming on to be heard upon the sworn petition of Mrs. Mary B. Knight, the paternal grandmother of Barbara Jane Knight, a minor, and that it appearing to the court that the said custody of the child has been awarded to Mrs. Mary B. Knight, by this court and it further appearing to the court that it is to the best interest of the child that she be returned to the paternal grandmother, Mrs. Mary B. Knight.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the Sheriff of Baldwin County, Alabama, or any sheriff of any county in which the minor child, Barbara Jane Knight, can be found, forthwith take the said child into their care and custody and deliver her to the Sheriff of Baldwin County, Alabama, who should deliver her to the paternal grandmother, Mrs. Mary B. Knight.

IT IS FURTHER ORDERED that a copy of this order should be the authority of any sheriff of any county to whom these orders be committed for the actions in the premises.

Done in Bay Minette, Alabama, this 13 day of July, 1954.

Hubert M. Hall
JUDGE

Received on the 13th day of July, 1954
TAYLOR WILKINS, Sheriff

926

Received the 13th day of July, 1954 the said Barbara Jane Knight, a minor from W. E. Combs, Deputy Sheriff of Mobile County, Ala. and I turned the said Barbara Jane Knight over to her Grandmother Mrs. Mary B. Knight.

BY: W. E. Combs
D.S. W. H. NHOLOCOMBE, SHERIFF

Received on the 13th day of July, 1954 and on the 13th day of July, 1954 I executed the within Writ by taking into my possession Barbara Jane Knight, a minor and delivering said minor into the custody of Pete Sellers, Deputy Sheriff of Baldwin County, Alabama.

SHERIFF'S RETURN

ALICE J. MACK, Registrar

FILED
JUL 13 1954

1954
Taylor Wilkins

BARBARA LAVERNE KNIGHT,
Complainant,
VS.
WILLIAM F. KNIGHT,
Respondent.

IN THE
CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA. IN EQUITY.
NO. 2894 $\frac{1}{2}$

This cause coming on to be heard is submitted for a decree upon the petition of Barbara Laverne Knight, seeking the custody of the minor child, Barbara Jane Knight, now three and one half years old, the answer and cross petition of Mary B. Knight, the paternal grandmother of the said minor, and the cross petition seeking the permanent custody of the said child, and testimony of witnesses taken ore tenus.

The Court finds that on September 16, 1952, a decree of divorce was granted in the case of Barbara Laverne Knight, Complainant, vs. William F. Knight, Respondent, in which the care, custody and control of Barbara Jane Knight, subject to certain conditions, was awarded to the Complainant, Barbara Laverne Knight. That subsequent thereto, on to-wit: January 15, 1953, a decree was rendered awarding the temporary custody of said minor child to Mrs. Mary B. Knight.

The Court, in arriving at a proper decree as to the custody of said minor child, Barbara Jane Knight, has taken into consideration the testimony of all of the witnesses, the conditions and environment of the respective homes, the care and attention the minor child needs, ever bearing in mind the fact that under normal circumstances the mother of the minor child should have the custody, care and control thereof, and after considering all of the evidence and exercising the right to observe the respective parties, is of the opinion and to the conclusion that it is to the best interest of the minor, Barbara Jane Knight, that she be left in the home of her paternal grandmother, Mary B. Knight, whom the Court finds to be a suitable, fit and proper person to have the care, custody and control of said minor child.

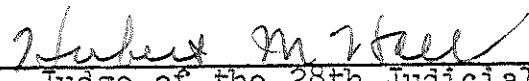
IT IS, THE REFORE, ORDERED, ADJUDGED AND DECREED by the Court that Mary B. Knight is a suitable and fit and proper person to have the custody of said minor, Barbara Jane Knight, and that it is to the best interest of said minor that said Mary B. Knight be, and she is hereby awarded the permanent care, custody and control of said minor child, Barbara Jane Knight.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that this Court retain jurisdiction of this matter, with the right to modify this decree from time to time as it should deem to the best interest of the said minor child.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Barbara Laverne Knight have the right to visit with the said child, Barbara Jane Knight, from time to time under reasonable and normal conditions, and shall have the right to the custody of said child the third weekend of each month, beginning Friday afternoon at 4 P.M. and ending Sunday afternoon at 4 P.M., and also for ten days each summer, beginning on June 25th. at 4 P.M. conditioned that the said Barbara Laverne Knight shall call for and deliver said child back into the custody of Mary B. Knight.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Petitioner, Barbara Laverne Knight, be taxed with the cost herein accrued, for which execution may issue.

Dated this 1st day of September, 1954.


Judge of the 28th Judicial Circuit
of Alabama.

BARBARA LAVERNE KNIGHT,
Complainant,
VS.
WILLIAM F. KNIGHT,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.
NO. 2894

O R D E R.

WHEREAS, the Complainant in the above styled cause has filed a petition praying that the Court modify the decree rendered in this cause on to-wit: the 15th day of January, 1953.

It is hereby ORDERED, ADJUDGED AND DECREED that this Petition be set down for hearing at 2 PM on the 17th day of August, 1954, at the Court House at Bay Minette, Alabama, and that a copy be served on MRS. MARY B. KNIGHT, notifying her of this hearing.

Done this 3 day of August, 1954.

Hubert M. Hall
Hubert M. Hall, Judge of the
Circuit court of Baldwin County,
Alabama, in Equity Sitting.

BARBARA LAVENE KNIGHT
COMPLAINANT
VS
WILLIAM F. KNIGHT
RESPONDENT

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

WHEREAS the parties hereto are husband and wife and have concluded that they can no longer lived together as husband and wife; and

WHEREAS they have one child, Barbara Jane Knight, now 19 months of age; and

WHEREAS the parties hereto cannot agree as to whom the custody of said child should be awarded.

NOW, THEREFORE, it is agreed by and between the parties, acting in their own behalf that the matter of the custody of said minor child, Barbara Jane Knight, shall be submitted to the Judge of this Court, and he after hearing such evidence as may be presented shall enter such decree as to the custody of the child as shall seem meet and proper in the premises.

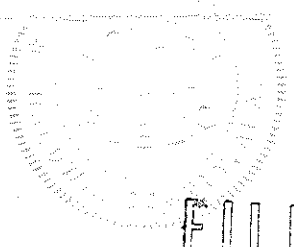
Barbara Lavene Knight
William Francis Knight

STATE OF ALABAMA
BALDWIN COUNTY

I, Hugh Paul, a Notary Public, inand for said County, in said State, hereby certify that Barbara Lavene Knight and William F. Knight, whose name is signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that, being informed of the contents of said conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 14 day of September, 1952.

Hugh Paul
Notary Public, Baldwin County, Alabama



FILED

9-16-52

ALICE J. GUCK, Register

RECORDED

702894

BARBARA LAVENE KNIGHT

COMPLAINANT

VS

WILLIAM F. KNIGHT

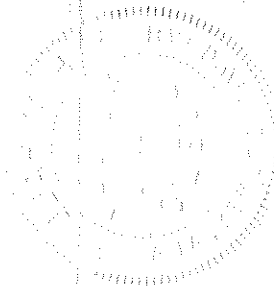
RESPONDENT

AGREEMENT

FILED

SEP 16 1952

ALICE J. DUCK, Register



STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILLIAM F. KNIGHT, 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 BARBARA LAVENE KNIGHT, as Complainant and against William F. Knight, as Respondent.

WITNESS my hand this the 16 day of September, 1952.

Register

BARBARA LAVENE KNIGHT	∅	
		IN THE CIRCUIT COURT OF
COMPLAINANT	∅	BALDWIN COUNTY, ALABAMA,
VS	∅	IN EQUITY
WILLIAM F. KNIGHT	∅	
RESPONDENT	∅	

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

Your Complainant, Barbara Lavene Knight, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a resident of Baldwin County, Alabama, nineteen years of age; that the Respondent is also a resident of Baldwin County, Alabama, and over twenty-one years of age;

2.

That your Complainant and the Respondent married in Lucedale, Mississippi on February 9, 1950, and that they lived together as husband and wife until on to-wit, September 7, 1952, when for the reasons hereinafter set out they could no longer live together as husband and wife.

3.

That on, to-wit, September 7, 1952, and on various occasions prior thereto and on various occasions prior thereto, the Respondent threatened and abused your Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to render it absolutely impossible for your Complainant to longer live with him.

4.

That there was born to the marriage between your Complainant and the Respondent one child, Barbara Jane Knight, 19 months old; that your Complainant is the suitable, fit and proper person to have her care, custody and control.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said William F. Knight 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 a final hearing hereof Your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that the Complainant be awarded the custody, care and control of the minor child, Barbara Jane Knight; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

[Signature]
Solicitor for the Complainant
Barbara Louene Knight
Complainant

FILED

9-16-52

ALICE J. DUCK, Register

702894 RECORDED

BARBARA LAVENE KNIGHT

COMPLAINANT

VS

WILLIAM F. KNIGHT

RESPONDENT

SUMMONS AND COMPLAINT

FILED

SEP 16 1952

ALICE J. DUCK, Register

BARBARA LAVERNE KNIGHT
Complainant,
Vs.
WILLIAM F. KNIGHT
Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.
NO. _____

P E T I T I O N .

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Comes now BARBARA LAVERNE KNIGHT, Petitioner and Complainant
in the above styled cause and Mother of BARBARA JANE KNIGHT, an
infant of the age of three and one-half years, and respectfully
represents and shows unto your Honor and this Honorable Court as
follows:

1. That on September 16, 1952, a decree of divorce was granted to your Complainant from William F. Knight, who is now deceased, in this Honorable Court.
2. That in and by the terms of said decree, your Petitioner was awarded the care, custody and control of the infant daughter, BARBARA JANE KNIGHT, WHO, at that time, was 19 months of age.
3. That on, to-wit: the 15th day of January, 1953, on Petition of the deceased, WILLIAM F. KNIGHT, THIS Honorable Court made and entered an order giving temporary custody of the said BARBARA JANE KNIGHT to the paternal grandmother, MRS. MARY B. KNIGHT.
4. That on, to-wit: the 2nd day of May, 1954, your Petitioner Respondent and the ~~COMPLAINANT~~ agreed to a reconciliation; that your Petitioner quit her job in Mobile, came to Bay Minette with the deceased, WILLIAM F. KNIGHT, and stayed in the Knight Home until, on, to-wit: the 5th day of May, 1954.
5. That on, the aforesaid 5th day of May, 1954, your Petitioner and the deceased, WILLIAM F. KNIGHT, left Bay Minette, taking with them the infant daughter, Barbara Jane Knight, to go to his job in Abbeville, Louisiana, with the intention of remarrying when they reached that city;
6. That nothing was said at that time about returning the infant child to its paternal grandmother, MRS. MARY B. KNIGHT, but that it was the understanding and intention of all the parties that

from that date, the 5th day of May, 1954, the said infant, BARBARA JANE KNIGHT, should make her home permanently with her Mother, your Petitioner, and Father.

7. That immediately after their return to Louisiana, and before they had an opportunity to remarry, the said WILLIAM F. KNIGHT was drowned and his body has not yet been recovered.

8. That shortly thereafter your Petitioner returned to Mobile and stayed with her family for a few days; that she then went to Bay Minette and stayed with the Knight Family for about two weeks; that, during all of that time, she had with her the infant, BARBARA JANE KNIGHT.

9. That she left the Knight home in Bay Minette on, to-wit: the 7th day of June, 1954, carrying her baby with her; that, at that time, nothing was said about her keeping her baby for only a few days.

10. That the first knowledge your Petitioner had that she was supposed to return her child to MRS. MARY B. KNIGHT, the paternal grandmother, was when the Sheriff of Mobile County served on her the Order of this Court of the 13th day of July, 1954.

11. That Mrs. Mary B. Knight is an elderly lady who has reared a family, and that it is not to the best interest of the said minor to be in her custody and control.

12. That your Petitioner is the natural mother of the child; that she loves her child; that she is able to provide for the child; that she has a suitable home; that she has a job earning, on the average, \$45.00 per week; and that it would be to the best interest of the said infant, BARBARA JANE KNIGHT, for your Petitioner to be given the permanent care, custody and control of said infant.

WHEREFORE, THE PREMISES CONSIDERED, your Petitioner prays that this Honorable Court will take jurisdiction of this Petition; that it will fix a suitable day for a hearing on the same; that it will give MRS. MARY B. KNIGHT notice of this Petition and the date set for hearing the same, and will notify her to have the said BARBARA JANE KNIGHT present in Court on that date; and that, on a hearing of this Petition, your Honor will make and enter an Order, Judgment or Decree giving to your Petitioner, BARBARA LAVERNE KNIGHT, the permanent Care, Custody and Control of the said infant, BARBARA JANE KNIGHT. And your

BOOK 215 PAGE 234

BOOK 015 PAGE 205

Petitioner prays for such other, further, different or general relief as in equity and good conscience she may be entitled to receive, and, as in duty bound, she will ever pray, etc.

Barbara Laverne Knight
P E T I T I O N E R.

STATE OF ALABAMA, 0
 0
COUNTY OF BALDWIN. 0

Before me, T. J. Mashburn, Jr., a Notary Public in and for said County and State, personally appeared BARBARA LAVERNE KNIGHT, whose name is signed to the foregoing Petition and who is known to me and who, being first duly and legally sworn, deposes and says: "I have read the foregoing petition and the facts alleged therein are true and correct."

Further deponent says not.

Barbara Laverne Knight

Sworn to and subscribed before me this 22nd day of July, 1954.

T. J. Mashburn, Jr.
Notary Public, Baldwin County, Alabama.

FILED
7-30-54
ALICE J. DICK, Register