

MINNIE LOU TUNSTALL,
Complainant,

vs.

SOLOMON TUNSTALL,
Respondent.

X
X
X
X
X
X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause, says:

1. That he admits the allegations of the first paragraph of the Bill of Complaint.
2. That he denies the allegations of the second paragraph of the Bill of Complaint and demands strict proof thereof.

The Respondent waives notice of the taking of testimony in said cause and notice of submission of said cause and agrees that the testimony may be taken and the cause submitted without further notice to him.

Respectfully submitted,

Solomon Tunstall
Solomon Tunstall

WITNESS:

Blanche White

4252

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IN THE CIRCUIT COURT OF

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IN EQUITY

FILED

MAY 13 1958

ALICE J. DUCK, Register

MINNIE LOU TUNSTALL)	
)	IN THE
COMPLAINANT)	
)	CIRCUIT COURT OF BALDWIN COUNTY,
VS.)	
)	ALABAMA. IN EQUITY
SOLOMON TUNSTALL,)	
)	June 2, 1958
RESPONDENT)	

TESTIMONY TAKEN IN OPEN COURT BEFORE HON. HUBERT M. HALL, JUDGE.

MINNIE LOU TUNSTALL, BEING FIRST DULY SWORN, TESTIFIED AS FOLLOWS:

Examination by Mr. Chason.

Q. Is this Minnie Lou Tunstall?

A. Yes sir.

Q. Are you the wife of Solomon Tunstall?

A. Yes sir.

Q. You are the Complainant in this suit for divorce against Solomon Tunstall?

A. Yes sir.

Q. Are you and Solomon Tunstall both over the age of 21 years?

A. Yes sir.

Q. Do you both reside in Baldwin County, Alabama?

A. Yes sir.

Q. How long have you been a resident of Baldwin County?

A. Ever since 1946.

Q. Where do you live?

A. Stockton, Alabama.

Q. When and where were you and Solomon Married?

A. At Bay Minette, in 1949.

Q. Where is your husband living now?

A. He's living in Bay Minette with Lee Johnson.

Q. At the time you filed this divorce suit you thought he lived at Tensaw?

A. Yes sir.

Q. Are you and your husband, Solomon Tunstall Separated?

A. Yes sir.

Q. How long have you been separated?

A. Three years.

Q. Do you remember the date of your separation?

A. Well it was the 12th day of June, 1955.

Q. Now at the time did Solomon Tunstall voluntarily abandon you without just cause or legal excuse?

A. Yes sir.

Q. Has he failed and refused to live with you since then?

A. Yes sir.

Q. You have not lived with Solomon Tunstall as his wife since May 12, 1955?

A. No sir.

Q. Has he supported you during that period of time?

A. No sir.

Q. Did he make any threats against you along about the time that you had to move out of the house?

A. Yes sir. He told me to move out; he wasn't going to support me no more.

Q. He told you to leave the home?

A. Yes sir.

Q. When he told you to do so, you left and you have not been back there since?

A. That's right.

Q. You and Solomon don't have any children, do you?

A. No sir.

Q. You're not wanting any support from him?

A. No sir.

Q. You just want your divorce?

A. Yes sir.

Minnie San Tunstall

C E R T I F I C A T E:

I hereby certify that the foregoing is a true and correct transcript of the testimony taken by me in this cause in open court on this day.

Louise Dusenbury
Official Court Reporter

4252