

4267
DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Eva Wilson

, Complainant

vs.

William Wilson

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Answer and waiver~~ 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

Eva Wilson

is forever divorced from the

said

William Wilson

for and on account of

Cruelty

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 payment of the cost of this suit.

It is further ordered that Eva Wilson

the Complainant pay the cost herein to be taxed, for which executed may issue.

This 16 day of April 1958

Robert M. Stone
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. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Eva Wilson

Complainant

vs.

William Wilson

Respondent

DIVORCE DECREE

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, as such time and place as you may appoint, to call before you and examine Eva Wilson

a witness in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Eva Wilson is

and William Wilson is , Complainant

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

Witness day of April , 195 8
Alice J. Luck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Eva Wilson

Complainant

VS.

William Wilson

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

FILED

APR 16 1958

ALICE J. DUCK, Register

THE STATE OF ALABAMA,

Circuit Court of Baldwin County, Alabama

BALDWIN COUNTY

(In Equity)

Eva Wilson

COMPLAINANT

vs.

William Wilson

RESPONDENT

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Eva Wilson

witness named in the requirement for Oral Examination, on the 16 day of April

19 58, at the office of Tolbert M. Brantley

in Bay Minette

Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Eva Wilson

doth depose and say as follows:

My name is Eva Wilson. I am over the age of 21 years and live in the Rosinton community near Loxley, Baldwin County, Alabama. The Respondent is over the age of 21 years and lives in the same general area. We have both resided in Baldwin County during the past ten years. We were married to one another in Deretta, Louisiana, on June 22, 1946. Our entire married life has been one of unpleasantness and strife between us. We were separated from one another in September of 1957 and have not lived together as man and wife since that date. On or about January 15, 1958, the Respondent was in my home and while there became violently angry with me and knocked a lamp off a table and threw a chair across the room and told me at that time not to cross his path again, and used some profanity in telling me this. From his manner of conduct and action toward me I was reasonably convinced that had I not stayed out of his way and kept quiet that he would have committed actual violence upon my person attended with danger to my life or health.

I believe that if I continued to live with the Respondent that he will do actual physical harm to me which will endanger my life or health and I do not feel that we can continue to live together as man and wife with any degree of safety.

Eva Wilson

I, Evelyn Watts as ~~Register and~~ Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness_____ and read over to her and she signed the same in the presence of myself and Tolbert M. Brantley at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness_____or had proof made before me of the identity of said witness_____; 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 April, 19 58.

_____(L. S.)

No. _____	Page _____
THE STATE OF ALABAMA, BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
Eva Wilson	
COMPLAINANT	
vs.	
William Wilson	
RESPONDENT	
ORAL DEPOSITION	
Filed <u>APR 16 1958</u>	19 <u>58</u>
RECORDED IN	
ALICE J. DUCK, Register, Register.	
Vol. _____	Page _____
Record _____	

Eva Wilson

vs.

William Wilson

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, _____

answer and waiver of Respondent and testimony of Eva Wilson

and in behalf of Defendant upon _____

Walter & Brantley
by W. J. Brantley

Alice J. Duck

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Eva Wilson

vs.

William Wilson

NOTE OF TESTIMONY

Filed in Open Court this FILED
day of APR 16, 1948

ALICE J. DUCK, Register
Register.

Printed By The Baldwin Times

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

Now comes the Respondent, in his own proper person, and admits the allegations contained in the bill of complaint filed in the above styled cause as to ages, residences, and marriage, but denies all other allegations therein contained and demands strict proof of the same.

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 G. Wilson

STATE OF ALABAMA
BALDWIN COUNTY

I, Elmer G. Walters, Jr., a Notary Public, in and for said County, in said State, hereby certify that William Wilson, 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 the instrument, he executed the same voluntarily on the day the same bears date. Given under my hand and seal on this the 16th day of April, 1958.

Notary Public, Baldwin County, Alabama

EVA WILSON

COMPLAINANT

VS

WILLIAM WILSON

RESPONDENT

ANSWER AND WAIVER

FILED

APR 16 1958

ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons WILLIAM WILSON to appear and plead, answer or demur within thirty days from the service thereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by EVA WILSON, as Complainant, and against William Wilson, as Respondent.

Witness my hand this the _____ day of April, 1958.

Alice J. Luck
Register

EVA WILSON	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA,
VS	Ø	IN EQUITY
WILLIAM WILSON	Ø	
RESPONDENT	Ø	

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

Your Complainant Eva Wilson, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both over the age of twenty-one years and are bona fide resident citizens of Baldwin County, Alabama.

2.

That your Complainant and the Respondent married at Deretta, Louisiana, on June 22, 1946, and lived together as husband and wife in Baldwin County, Alabama, until in September 1957.

3.

That in to-wit, September, 1957, and on various occasions prior thereto, the Respondent cursed, 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 give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person which would necessarily endanger her life and health.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said William Wilson 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 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; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY: Harry J. Wilters, Jr.
Solicitors for the Complainant

4267

EVA WILSON

COMPLAINANT

VS

WILLIAM WILSON

RESPONDENT

BILL OF COMPLAINT

FILED

APR 16 1958

ALICE J. DUCK, Register

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY LAW OFFICER OF THE STATE OF ALABAMA:

You are hereby commanded to summon MARY GRICE, CHARLES D. GRICE, MARION L. GRICE, ANNIE GRICE DOHERTY AND ROBERT N. GRICE, to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, in Equity, at the place of holding same, then and there to plead, answer or demur to the Bill of Complaint filed against them by LORETTO McDONAGH MURRAY.

WITNESS my hand this 18 day of April, 1958.

141

W. J. D. D. D.
Register.

STATE OF ALABAMA)
 *
BALDWIN COUNTY)

TO ANY LAW OFFICER OF THE STATE OF ALABAMA:

You are hereby commanded to summon MARY GRICE, CHARLES D. GRICE, MARION L. GRICE, ANNIE GRICE DOHERTY AND ROBERT N. GRICE, to appear within thirty days from the service of this writ in the Circuit Court of Baldwin County, Alabama, in Equity, at the place of holding same, then and there to plead, answer or demur to the Bill of Complaint filed against them by LORETTO McDONAGH MURRAY.

WITNESS my hand this 18 day of April, 1958.

Reverend J. D. Smith
Register.

Loretto M^cDonagh Murray

Mary Grice et al

BILL OF COMPLAINT

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

The Complainant, Loretto McDonagh Murray, presents this Bill of Complaint against Mary Grice, Charles D. Grice, Marion L. Grice, Annie Grice Doherty and Robert N. Grice, and thereupon the Complainant complains and shows unto the Court and your Honor as follows:

1. The Complainant is over twenty-one years of age and is a resident of Cook County, Illinois.

Mary Grice and Charles D. Grice are each over twenty-one years of age and each reside in Baldwin County, Alabama.

Marion L. Grice is over the age of twenty-one years and a non-resident of the State of Alabama, whose residence and post office address is Skyland, North Carolina.

Annie Grice Doherty is over the age of twenty-one years and a non-resident of the State of Alabama, whose residence and post office address is 12 Liberty Place, Weehawken, New Jersey.

Robert N. Grice is over the age of twenty-one years and a non-resident of the State of Alabama, whose residence and post office address is 86 Edgemond Road, Asheville, North Carolina.

2. Complainant claims to own and is in the actual, quiet and peaceable possession of the following described real property situated in Baldwin County, Alabama, to-wit:

IN TOWNSHIP 3 SOUTH, RANGE 2 EAST:

Southwest Quarter of Northwest Quarter;
West half of Southwest Quarter, Section 2;

East half of East half, Section 3;

West half of Southeast Quarter of Southwest Quarter;
West half of East half of Southeast Quarter of Southwest Quarter;
East half of Southeast Quarter of Southeast Quarter of Southwest Quarter, Section 4;

Lot C, EXCEPT Southwest Quarter of Southwest Quarter of Southwest Quarter, Section 4;

All of Lot B West of Byrnes Lake;
Lot D, Section 8;

All of Southwest Quarter, EXCEPT Southwest Quarter of Southwest Quarter of Southwest Quarter, Section 9;

The James Callier Grant, Section 39, Township 3 South, Range 2 East, containing 337.53 acres;

The Thomas Byrne Grant, Section 40, Township 3 South, Range 2 East, containing 672.32 acres, EXCEPT the following described property:

Begin at the Southeast corner of the said Section 40 and run thence Northwardly along the East line thereof 1687 feet, more or less, to the point where the East line of the said Section 40 intersects the South line of Bayou Wiltz; thence Southwestwardly along Bayou Wiltz and following the meanders thereof to the point where the said Bayou intersects Byrnes Lake; thence Southwestwardly along Byrnes Lake and following the meanders thereof to the South line of the said Section 40; thence East along the South line of the said Section 40, 2193 feet to the point or place of beginning, which said excepted portion contains 55 acres, more or less,

3. The Respondents claim, or are reputed to claim some right, title or interest in, lien or encumbrance on the said lands; no suit is pending to enforce or test the validity of such title, interest in, lien or encumbrance on the said lands, and the Complainant brings this Bill of Complaint against the said Respondents to settle the title to the said lands and to clear up all doubts and disputes concerning the same. The Complainant here and now calls upon the said Respondents to set forth and specify their right, title or interest in, lien or encumbrance on the said lands, or any part thereof, and how and by what instrument the same is derived and created.

4. The Complainant is also in possession of and claims to own the timber growing on the above described lands.

On, to-wit, the 8th day of March, 1958, the Respondents, Mary Grice and Charles D. Grice, or one of them, had a survey made of a part of the above described property and on, to-wit, the 18th day of March, 1958, the Respondent, Mary Grice, who is the same person as M. Y. Grice, made an escape tax assessment in the Office of the Tax Assessor of Baldwin County, Alabama, which assessment covered a part of the above described lands.

On, to-wit, March 15, 1958, the Respondents, Mary Grice and Charles D. Grice, or one of them, sold timber to J. B. Jones, who caused timber to be cut and removed on, to-wit, March 26, 1958, from a part of the lands which are not claimed by the

Complainant, but which are included in the said escape assessment with that part of the lands which are included therein, which are claimed by the Complainant.

Complainant is informed and believes and on such information and belief alleges the fact to be that the Respondents, or some of them, will cut and remove timber which is growing on the above described lands unless they are restrained from so doing, and the Complainant further alleges that the present status of the property involved in this suit should be maintained until a final hearing is had in this suit.

PRAYER FOR PROCESS

Complainant prays that the said Mary Grice, Charles D. Grice, Marion L. Grice, Annie Grice Doherty and Robert N. Grice be made parties Respondent to this Bill of Complaint and that the usual process of this Honorable Court do forthwith issue to them.

PRAYER FOR RELIEF

The Complainant prays for the following separate and several relief:

1. That a temporary writ of injunction be issued restraining the Respondents and each of them from trespassing on the above described property, from cutting and removing timber therefrom and from changing the status quo of the said property pending a final hearing of this suit.

2. That upon a final hearing of this cause that this Court will make and enter a decree against the said Respondents, quieting Complainant's title to the said lands and adjudging and decreeing that the Complainant is the owner thereof in her own right; that the title thereto is in her forever quieting the Complainant's title against the Respondents and adjudging and decreeing that they, and each of them, are without right, title or interest in the said lands, and have and hold no encumbrance thereon.

3. Complainant further prays for such other, further and general relief as she may be equitably entitled to, the premises considered.


Solicitor for Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned authority, within and for said County in said State, personally appeared J. B. Blackburn, who, after being by me first duly and legally sworn, deposes and says: That he is Solicitor for the Complainant in the above entitled cause; that he has read over the foregoing Bill of Complaint and that the facts stated therein are true.

J. B. Blackburn

Sworn to and subscribed before

me on this the 17 day of

April, 1958.

Alice L. Miller
Notary Public, Baldwin County, Alabama.

filed April 18, 1958
Alice J. Clark, Registrar
Expirated April 22, 1958
on: Mary Price
Charles Price

TO ALICE J. DUCK, REGISTER OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Upon Complainant entering into bond with requisite
security in the sum of One Thousand Dollars (\$1,000.00), payable
and conditioned as provided by law, let an injunction issue
according to the prayer of the Bill of Complaint.

DATED this 18 day of April, 1958.

Hubert M. Hall
Judge.

4267

1. The first part of the report is a summary of the work done during the year.

2. The second part is a detailed account of the work done during the year.

3. The third part is a summary of the work done during the year.

4. The fourth part is a summary of the work done during the year.

5. The fifth part is a summary of the work done during the year.

6. The sixth part is a summary of the work done during the year.

7. The seventh part is a summary of the work done during the year.

8. The eighth part is a summary of the work done during the year.

9. The ninth part is a summary of the work done during the year.