## The State of Alabama, Baldwin County

### CIRCUIT COURT, IN EQUITY

	J. WILSON		, Complainant
	VS.		
DERL S	. WILSON	anner programment of the control of the	, Respondent
This cause coming on to be he	eard was submitted t	The state of the s	A CONTRACTOR OF THE PROPERTY O
Answer and Waive	Cand T	estimony as noted b	y the Register, and upon co
deration thereof, the Court is of th		* *	
id bill.		er General	
It is therefore ordered, adjudg	ged and decreed by t	he Court that the bo	ends of matrimony heretofo
xisting between the Complainant as	nd Defendant be, and	l the same are hereb	y dissolved, and that the sa
Sarah J. Wilson			is forever divorced from the
id Derl S. Wilson			for and on account
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the Complainant, Sara	h J. Wilson,	shall have th	ne care, custody a
control of the minor	children. Car	l Wilson. ag	e about 4: Edna
Mae Wilson, age about	and a grant of the second of t	gar and a second control of the second contr	
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No.\_\_\_\_Page\_\_\_\_

## THE STATE OF ALABAMA BALDWIN COUNTY

In Circuit Court, In Equity

SARAH J. WILSON

Complainant

vs.

DERL S. WILSON

Respondent

## DIVORCE DECREE

FILED JUN 19 1958

ALICE J. DBCK, Register

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SARAH J. WILSON

COMPLAINANT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

VS

IN EQUITY.

DERL S. WILSON

RESPONDENT

Now comes the Respondent and accepted service of the summons and complaint in this cause.

次

The Respondent admits the allegations as the ages, marriage and residence, but denies all other allegations contained in the bill of complaint, 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.

Derl S Wilson

STATE OF Alakanea
COUNTY OF Elenase

Given under my hand and seal on this the 20 day of May, 1958.

Saul Marry Notary Public, Sale-at Marge

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SARAH J. WILSON

COMPLAINANT

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DERL S. WILSON

RESPONDEME

ANSWER AND WATVER

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# THE STATE OF ALABAMA Baldwin County

Circuit Court

TO: LOIS WILSON

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 Saxah J. Wilson and Mae Bell Johnson

a witness in behalf of Sarah J. Wilson in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Sarah J. Wilson

, Complainant

and Derl S. Wilson

Respondent

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

Witness

124 day of

Jimo

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Register.

Commissioner's Fee, \$

Witness' Fees, \$

# THE STATE OF ALABAMA Baldwin County

### CIRCUIT COURT

SARAH J. WILSON

Complainant

VS.

DERL S. WILSON

Defendant

#### COMMISSION TO TAKE DEPOSITION

#### COMMISSIONER:

LOIS WILSON

#### WITNESSES:

SARAH J. WILSON
MAE BELL JOHNSON

STATE OF ALABAMA BALDWIN COUNTY

and the second

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon DERL S. WILSON, 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 SARAH J. WILSON, as Complainant and against DERL S. WILSON, as Respondent.

WITNESS my hand this the	
	Register.
* * * * * * * * * * * * * * * * * *	*************
SARAH J. WILSON	* IN THE CIRCUIT COURT OF *
COMPLAINANT	* BALDWIN COUNTY, ALABAMA.
VS	* IN EQUITY. * (
DERL S. WILSON	* CASE NO.
respondent	*

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

Your Complainant, Sarah J. Wilson, respectfully represents unto Your Honor and this Honorable Court as follows:

1,

That your Complainant is over the age of 21 and a resident of Alabama, and has been more than two years next preceding; The Respondent is over the age of 21 and a resident of Alabama presently residing at Elmore, Alabama, Board of Corrections, Draper Correctional Center.

2.

That your Complainant and the Respondent married at Brewton,
Alabama, on March 6, 1953 and lived together as husband and wife in
Alabama until on to-wit October 6, 1956.

3.

That on to-wit October 6, 1956, while your Complainant and the Respondent were living together as husband and wife in Baldwin County, Alabama, the Respondent woluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

There were born as fruits of this marriage between the

Complainant and the Respondent Thræchildren: Carl Wilson, age about 4; Edna Mae Wilson, age about 3; Daniel Ray, age about 2; and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Derl S. 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 further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; and that a decree be made awarding to the Complainant the care, custody and control of the minor children, Carl Wilson, age about 4; Edna Mae Wilson, age about 3; and Daniel Ray Wilson, age about 2; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Solicitor for the Complainant.

SARAH J. WILSON

COMPLAINANT

٧S

DERL S. WILSON

RESPONDENT

JUMMONS AND COMPLAINT

FILED
JUN 9 1958
ALICE J. DECK, Register

#### THE STATE OF ALABAMA

Baldwin County.

## Circuit Court of Baldwin County, Alabama (In Equity)

SARAH SARAH	<u>J, WILSON</u>		Complainant		
in diamond	1	VS.			
DERL S	. WILSON		Ţ	Respondent	4.
I, Lois Wilson					
as Register and Commissione			Wilcon and	7 74-0 7037	
have called and caused to cor	ne before me <u> </u>	Can Can C a	VVIII CILL	. Mac Seri	r oomson
witness esnamed in the Rec	_		ation, on the $\Box$	4리day of	June
in Bay Minette	, Alabama, an	nd having fi	rst sworn said	Witness @S	to speak the
truth, the whole truth, and no	thing but the tru	th, the said	Sarah J.	Wilson a	and Mae
Bell Johnson	doth depose a	nd say as f	ollows:		

That my name is Sarah J. Wilson, I am over the age of 21, and have been a resident of the State of Alabama all my life. The Respondent Derl S. Wilson, is also over the age of 21 and has been a resident of Alabama all his life. We were married on March 6, 1953 at Brewton, Alabama and lived together as husband and wife until on or about October 6, 1956. The Respondent having abandoned me without fault on my part. The Respondent had not provided for nor supported me or our three children for more than three years next preceding. There was born as fruits of our marriage Carl Wilson, age about 4, Edna Mae Wilson, age about 3 and Daniel Ray Wilson, age about 2. I have had their care, custody and control since birth and respectfully submit to this Court that I am a fit, suitable and proper person to have their permanent care, custody and control and ask that such be granted me. There is no property to be divided. I know that I shall never live together again with the Respondent as his wife and respectfully ask for a divorce.

Sarah J. Wilson

That my name is Maebell Johnson, I know both parties to this cause. They are both over the age of 21 and have been residents of the State of Alabama since birth. They were married at Brewton, Alabama on or about March 6, 1953 and lived together in Alabama as Husband and wife until on or about October 6, 1956 at which time the Respondent abandoned the Complainant. They have not lived together as husband and wife since that occasion and I do not believe they will ever live together again. They have three children born as fruits of their marriage, Carl age about 4, Edna Mae age about 3 and Daniel Ray age about 2 years. The Complainant has had the care custody and control of these children since their birth and I respectivilly recommend her as a fit, suitable and proper person to have their permanent care, custody and control.

mar Bell Johnson

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I, Lois Wilson	as Register and Commissioner hereby certify that
the foregoing deposition S 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 C. LeNoir Thompson	
at the time and place herein mentioned; that I	have personal knowledge of personal identity of
said witness <u>es</u> or had proom made before me	of the identity of said witness es; that I am not of
counsel or 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 enve	elope to the Register of said Court.
Given under my hand and seal, this 14thday	of <u>June</u> , 195 8
and the second of the second o	Join Wilson (L. S.)
	SS NO

Filed Wy & E Register.  Register.  Record  Vol. Page Register.  Record	Oral Deposition	vs. Complainant	IN CIRCUIT COURT, IN EQUITY SARAH J. WILSON	NO PAGE THE STATE OF ALABAMA BALDWIN COUNTY

WANDA MAE STANTON WILSON

Complainant

VS

JAMES LEONARD WILSON

Respondent

IN THE CIRCUIT COURT BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: 43000

Comes now Respondent in the above styled cause and accept services a copy of the Complainant's bill of complaint and waives further notice and waives all further notices of taking of testimony and submission, and for answer to the bill and each paragraph thereof, says:

- 1. Respondent admits to the allegations containing in paragraph 1.
- 2. Respondent admits to the allegations to paragraph 2.
- 3. Respondent denies the allegations containing in paragraph 3 and demands strict proof thereof.
- 4. Respondent denies the allegations containing in paragraph 4 and demands strict proof thereof.

Sworn to and subscribed before me this the 3/18 day of

Mae, 1958.

JUN 10 1958 ALICE J. DUCK, Register

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THE STATE OF ALABAN  Baldwin County	ЛA
IN EQUITY Circuit Court of Baldwin C	ouniv
WANDA HAE WILSON	
COMPLAINANT	
vs,	
JAMES L. WILSON	· .
RESPONDENT	
NOTE OF TESTIMONY	
iled in Open Court this	
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JUN 10 1958  ALICE J. DUCK, Register Regist	
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#### THE STATE OF ALABAMA

Baldwin County.

## Circuit Court of Baldwin County, Alabama (In Equity)

wanda mae wilson			Complainar	ıt	
JAMES L. WILSON  I. RUTH K. HOWELL	VS.		Respondent	*	
as Register and Commissioner have called and caused to come before me Broughton	Wanda Mae	Stanton	Wilson and	Minnie	
witnessnamed in the Requirement for (195, at the office of, Alabama, a	nd having fi	ation, on th	said Witness_	f June to spe	eak the
truth, the whole truth, and nothing but the truth, the Broughton doth depose			ae Stanton	Vilson a	nd

My name is Wanda Mae Stanton Wilson and I am the Complainant in this case. I am over 21 years of age and live in Baldwin County, Alabama. I have lived in Baldwin County for many years with my husband, James L. Wilson. I was married to James L. Wilson on September 26, 1943 and lived with him as husband and wife until April 6, 1958. During our marriage we had 5 children; Harold age 13, Robert Irwin, age 11, Waymond age 8, Nancy age 6 and John age 5. During our life together my husband frenquently got drunk and beat and cursed me and pulled my hair. On April 6 he threatened to beat me and said he would beat very bad. He hit me with his hand and walker out. We have not lived together as husband and wife since that time. I am unable to support the children completely but can take good care of them if I have a little help. My husband is able to work and earms good wages of about \$70.00 per week. I have no way to take care of the children.

### Wanda man Starton Wilson

My name is Minnie Broughton. I live at Cross Roads in Baldwin County, Alabama. I know that my daughter, Wanda Mae Stanton Wilson was married to James L. Wilson in 1943. They have 5 children. While they have been married he fireatened her very badly and have beaten her up several times. Early in the month of April, after the 6th of April, my daughter Wanda Mae Stanton Wilson came to me and complained that her husband had gotten drunk and beat and threatened her and that she was afraid that he would kill her or beat her up some more. She is a good mother and is able to care for their children. She does not have much money and is unable to earn more than about \$35.00 per week.

minnie Broughten

I, Ruth K. Howell , as:	Begister and Commissioner hereby certify that
the foregoing deposition_on Oral Examination wa	as taken down by me in writing in the words
of the witness and read over to them are	ad they signed the same in the presence of
myself	
at the time and place herein mentioned; that I have	ve personal knowledge of personal identity of
said witnessor had proom made before me of	the identity of said witness_; that I am not of
counsel or 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 envelop	e to the Register of said Court.
Given under my hand and seal, thisday of	
	Ruth 7. Howell (L. S.)

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	Page	JUN 10 1958  ALICE J. DUCK, Register  Recorded in	Dep	4.5	vs.	NOSIIM AW W	N CIRCUIT COURT, IN	THE STATE OF ALABA	PAGE
	Record  Record  Register	, 195 , Register.	osition	Respondent.	Complainant		EQUITY	ALABAMA DUNTY	

# THE STATE OF ALABAMA Baldwin County

Circuit Court

TO:

RUTH K. HOWELL

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

WANDA MAE WILSON and Minni Broughton

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

, Complainant

and

James L. Wilson

Respondent

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

Witness

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June

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Register.

Commissioner's Fee, \$

Witness' Fees, \$

WANDA MAE WILSON

COMPLAINANT

VS

JAMES L. WILSON

RESPONDENT

IN THE CIRCUIT COURT
BAIDWIN COUNTY, AIABANA
IN EQUITY

NUMBER:	

#### FINAL DECREE

This cause coming on to be heard was submitted upon Bill of Complaint, 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 Wanda Mae Wilson is forever divorced from the said James L. Wilson for and on account of CRUELTY.

It is further ordered, adjudged and decreed that the said minor children, Harold Wilson, age 13, Robert Irwin Wilson, age 11, Waymond Wilson, age 8, Nancy Wilson, age 6, and John Wilson, age 5, being and same are hereby placed in the custody of the said Wanda Mae Wilson, Complainant, subject to reasonable privileges and visitations by Respondent.

It is further ordered, adjudged and decreed that the said James L. Wilson, Respondent, contribute to the support of said minor children the sum of \$55.00 per month, to be paid in monthly installments to Complainant.

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 Complainant pay the cost herein to be taxed, This // day of // 1958. for which executed may issue.

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WANDA MAE WILSON

Complainant

VS

JAMES L. WILSON

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: 145000

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

Comes now your Complainant, Wanda Mae Wilson, and humbly complaining against James L. Wilson, Respondent, respectfully shows unto your Honor:

Ι

.-.-.-.

That your Complainant and Respondent are each over the age of 21 years and are bona fide residents of Baldwin County, Alabama and that they have been residents of Baldwin County, Alabama for more than 2 years next preceeding the filing of this bill of complaint.

II

That they were married on September 26, 1943 and lived together as husband and wife until March 23, 1956; that there were born to them five children whose names and ages are as follows: Harold Wilson, age 13, Robert Irwin Wilson, age 11, Waymond Wilson, age 8, Nancy Wilson, age 6, and John Wilson, age 5; and that Complainant is a fit and proper person to have custody of said children.

III

That on to-wit April 6, 1958 and many times prior thereto and since said marriage, the said James L. Wilson committed actual violence to her person by stricking her with his hands attended with danger to her life and health or from his conduct and threats toward her at said time there was and is grave danger that he would commit such violence.

IV

That Respondent is an able bodyed man and is able to support the said children by giving them \$55.00 per month.

WHEREFORE your Complainant prays that this Honorable Court will take the jurisdiction of the cause made by this bill of complaint and make the said James L. Wilson, party Respondent hereto, and by appropriate process require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this Complainant, giving her custody of the said children and allowing a reasonable sum for support for the said children and Complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive in the premises.

Wanda Mae Wilson
Complainant

Sworn to and subscribed before me this 9th day of June, 1958.

Votary Public. State of Alabama at

WANDA MAE WILSON

COMPLAIMANT

VS

JAMES L. WILSON

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIH COUNTY, ALABAMA

IN EQUITY

NULBER:

COMPIAINT

FILED JUN 10 1958 ALICE J. DUCK, Register

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