### The State of Alabama, Baldwin County

### CIRCUIT COURT, IN EQUITY

BETTY G	• WILLIAMS	Complainant
	vs.	
THOMAS	B. WILLIAMS	Respondent
This cause coming on to be heard	d was submitted upon Bil	li of Complaint, Reconstruction Complaint, Reconstruction
answer and waiver	and Testimor	ny as noted by the Register, and upon con-
sideration thereof, the Court is of the opsaid bill.	oinion that the Complain	ant is entitled to the relief prayed for in
		t that the bonds of matrimony heretofore me are hereby dissolved, and that the said
Betty G. Williams		is forever divorced from the
		for and on account of
44.4		in the second of account of
Cruelty		
		:
. 27		White the state of
days, neither party shall again marry ex It is futher ordered that the Com again contract marriage upon payment of It is further ordered that	plainant and Respondent of the cost of this suit.  Thomas B. Williams	and that if appeal is taken within sixty g the pendency of said appeal.  t be, and they are hereby permitted to be taxed, for which executed may issue.  Judge Circuit Court, In Equity.
I,	Court of Baldwin Coun foregoing is a correct of Judge of the Circuit Co decree is on file and en	
	of	and seal this theday
		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

JUN 12 1958
ALICE J. DUCK, Register

# THE STATE OF ALABAMA Baldwin County

Circuit Court

TO:

DELTA H. GWALTNEY

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 Betty G. Williams and Carolyn Burke.

z witness in behalf of Betty G. Williams in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Betty G. Williams is

, Complainant

and Thomas B. Williams is

Respondent

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

Witness

// day c

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Register

Commissioner's Fee, \$

Witness' Fees, \$

## THE STATE OF ALABAMA Baldwin County

### CIRCUIT COURT

BETTY G. WILLIAMS,

Complainant VS.

THOMAS B. WILLIAMS,

Defendant

### COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

DELTA H. GWALTNEY.

WITNESSES:

Betty G. Williams, Carolyn Burks

BETTY G. WILLIAMS	
	THE STATE OF ALABAMA
	Baldwin County
vs.	-
THOMAS B. WILLIAMS	
	IN EQUITY
	Circuit Court of Baldwin County
	<b>-</b> ∥
This cause is submitted in behalf of	Complaint upon the original Bill of Complaint
	of Betty G. Williams and Carolyn Burke.
	of Peroy C. Affilians and Carolyn Burke.
nd in behalf of Defendant upon	
1 (1) 0:0	Olice J. Wark
Jems G. Hendrif	Register.

THE	STATE OF ALABAMA Baldwin County
	IN EQUITY
Circ	uit Court of Baldwin County
В	ETTY G. WILLIAMS
<del></del>	VS.
J	THOMAS B. WILLIAMS
No	te of Testimony
Filed in (	Open Court this
dan of	и ицЦШ , 19 <sub>1350</sub> , 19-

ALICE J. DUCK, Register, Register.

MOORE PRINTING CO., BAY MINETTE, ALA.

## THE STATE OF ALABAMA, BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama (In Equity)

BETTY G.	WILLIAMS	COMPLAINANT	
	vs.		nd law je
les la giltació la equençi englia THOMAS P.	WILI IAMS	RESPONDENT	
I, DELTA H. GWALTNEY			
percent distance of the second of the second			
as Registerxand Commissioner			
witnesses named in the requirement to 1958, at the office of James A. Hen		nation, on the 6th day	of June
in Robertsdale , Alabama	a, and having fi	irst sworn said witness <u>es</u>	_ to speak the
truth, the whole truth, and nothing but the	e truth, the said	Betty G. Williams	and
Carolyn Burke	doth dep	ose and say as follows:	nare arres

My name is Fetty G. Williams. I am over 16 years old and live in Seminole, Alabama, and have lived there for more than the past two years; Thomas E. Williams is over 21 years old and lives in Seminole, Alabama. Thomas and I were married on March 31, 1956, at Pascagoula, Mississippi, On March 22, 1958, Thomas beat me up pretty bad, and I still have bruises on me from this beating; I am convenienced that if I continue to live with him, he will commit violence on my person which would endanger my life and health; as a result of this beating, We have not lived together as husband and wife since, and we have not recognized each other as husband and wife, We had no children.

Betty Williams

My name is Carolyn Purke . I have known Betty G. Villiams for more than the past ten years. She is over 16 years old and lives in Seminole, Alabama, and have lived there for more than the past two years; Thomas F. Williams is over 21 years old and lives in Seminole, Alabama. Betty and Thomas were married on March 31, 1056, at Pascagoula, Mississippi. On March 22, 1958, Thomas beat her up pretty bad, and she still has bruises on her from this beating; I am convenienced that if she continue to live with him, he will commit violence on her person which would endanger her life and health; as a result of this beating, they have not lived together as husband and wife, and they have not recognized each other as husband and wife. They had no children.

Carolyn Burke

I, Delta H. Gwaltney	as Register and Commissioner hereby	certify
that the foregoing deposition on Oral Exami	ination was taken down in writing by me in the	words
of the witnesses and read over to them	andthey signed the same in the prese	nce of
myself and James A. Hendrix		
at the time and place herein mentioned; that I	I have personal knowledge of personal identity	of said
witnesses or had proof made before me of t	the identity of said witnesses; that I am	not of
counsel or of kin to any of the parties to said	cause, or any manner interested in the result the	nereof
I enclose the said Oral Examination	in an envelope to the Register of said Court.	mari yang Talahan
Given under my hand and seal, this_	6th day of <u>June</u> , 19 58	<b></b> -
1	Delta N. Gwaltney	(L. S.
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B.	HE ST.  IN CIRCI  BETTY G  THOMAS	
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L P	T COURT WILLIAMS VS. WILLIAMS	
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DEPOSITION	THE STATE OF ALABAMA,  BALDWIN COUNTY  IN CIRCUIT COURT, IN EQUITY  BETTY G. WILLIAMS  COMPLAINAN  VS.  THOMAS B. WILLIAMS  RESPONDEN	A THE CONTRACT OF THE PARTY OF
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BETTY G. WILLIAMS,	Ĭ	
Complainant,	Í	IN THE CIRCUIT COURT OF
vs.	Ĭ	BALDWIN COUNTY, ALABAMA
THOMAS B. WILLIAMS,	I	OF A
Respondent.	X	en e

#### ANSWER AND WAIVER

Comes now the Respondent, Thomas R. Williams, and for answer to the Bill of Complaint heretofore filed against him in said cause says as follows:

1. That he denies each and every allegation of the said Bill of Complaint and demands strict proof thereof.

And for further answer to the said Pill of Complaint the Respondent hereby accepts service of a copy and notice of the filing of the said Bill of Complaint and does hereby waiver any further notice to him of the day set for hearing, the taking of testimony or the submission for final decree of the above styled cause and does here consent that the same may be submitted and testimony taken without further notice to him.

Thomas B. Williams

Thomas B. Williams

Sworn to and subscribed before me

on this the 22 day of March, 1958.

Motory Public, Baldwin County, Alabama.

FILE DUCK, Register ALICE J. DUCK, Register

STATE OF ALABAMA )		
BALDWIN COUNTY )		
BETTY G. WILLIAMS,	)	
Complainant,	)	IN THE CIRCUIT COURT OF
<b>v</b> s.	)	BALDWIN COUNTY, ALABAMA
THOMAS B. WILLIAMS,	)	IN EQUITY.
Respondent.	)	

To the Honorable Judge of the Circuit Court of Baldwin County,

Sitting in Equity:

Comes now the Complainant, BETTY G. WILLIAMS, humbly complaining of the Respondent, THOMAS B. WILLIAMS, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, BETTY G. WILLIAMS, is over the age of 16 years and is a resident of Baldwin County, Alabama, and has been a bond fide resident of said State for more than two years next preceeding the filing of this Bill of Complaint; that the Respondent is over twenty-one years old and is a resident of Seminole, Alabama.

SECOND: That your Complainant and Respondent were lawfully married on or about, to-wit: March 31, 1956, at Pascagoula, Mississippi.

THIRD: Your Complainant avers and charges that the said Respondent did on or about the 22 day of March, 1958, and many times prior 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.

FOURTH: Your Complainant would further aver and show unto Your Honor that no children were born to the Union of the Complainant and Respondent; and that there is no property to be settled between the Complainant and Respondent.

### PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said
Thomas B. Williams be made party Respondent to this her Bill of Complaint and
that a summons be issued and served upon him as required by law and the rules
of this Honorable Court, and that he be required to plead, answer or demur to
the within Bill of Complaint within the time and under the penalties prescribed
by law and the rules of this Honorable Court.

#### PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said decree the Complainant will be granted the right to again contract marriage.

Complainant prays all other further and general relief to which she may be entitled, the premises considered and she will ever pray, etc.



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