

4466

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 Ameal Hale Brown and Gladys H. Brown

a witness in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Ameal Hale Brown is

, Complainant

and William Eugene Brown is

Respondent

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

Witness 5 day of

Feb.

, 195 9

Alice J. Luck

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Aneal Hale Brown

VS. Complainant

William Eugene Brown

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

Aneal Hale Brown
Gladys H. Brown

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

Ameal Hale Brown COMPLAINANT

vs.

William Eugene Brown RESPONDENT

I, Evelyn Watts

as ~~Register and~~ Commissioner

have called and caused to come before me Ameal H. Brown and Gladys H. Brown

witness es named in the requirement for Oral Examination, on the 31st day of January
1959, at the office of Wilters & Brantley

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 Ameal H. Brown and Gladys

H. Brown

doth depose and say as follows:

My name is Ameal Hale Brown. I and William Eugene Brown are both over the age of 21 years and residents of Baldwin County, Alabama. We were married at Pascagoula, Mississippi, on June 1, 1957, and we lived together in Baldwin County until September 1, 1957. On that date William cursed, threatened and abused me and threatened to do violence to me and if he had carried out his threats my life and health would have been endangered and I had every reasonable apprehension to believe and I did believe that if I continued to live with him he would do violence to me which would have endangered my life and health. He had beat me a number of times and cursed me prior to this.

Ameal H. Brown

My name is Gladys Brown and I have known Ameal and William Brown all during their married life and I know that they had a lot of trouble together and I do not believe they will ever get along. I think it would be the safest for both of them to be separated.

Gladys H. Brown

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 es and read over to them and they signed the same in the presence of myself and Harry J. Wilters Jr.

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof 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 31st day of January, 19 50.

Evelyn Watts (L. S.)

| | |
|---|--------------|
| No. _____ | Page _____ |
| THE STATE OF ALABAMA, BALDWIN COUNTY | |
| IN CIRCUIT COURT, IN EQUITY | |
| Amel Hale Brown | |
| COMPLAINANT | |
| vs. | |
| William Eugene Brown | |
| RESPONDENT | |
| ORAL DEPOSITION | |
| Filed _____ | 19 _____ |
| FILED | |
| FEB 5 1959 | |
| Attest to Duck, Register | Register. |
| RECORDED IN _____ | Record _____ |
| Vol. _____ | Page _____ |
| Register. | |

Ameal Hale Brown

vs.

William Eugene Brown

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 Ameal Hale Brown and

Gladys H. Brown

and in behalf of Defendant upon _____

William E. Brantley
by Henry Williams

Alice J. Clark
Register.

No. 12

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Areal Hale Brown

vs.

William Eugene Brown

NOTE OF TESTIMONY

Filed in Open Court this

day of

FILED

, 194

FEB 5 1959

ALICE J. DUCK, Register

Register.

Printed by the Baldwin Times

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon WILLIAM EUGENE BROWN 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 AMEAL HALE BROWN as Complainant and against William Eugene Brown, as Respondent.

WITNESS my hand this the 29 day of August, 1958.

Alice J. Smith
Register

| | | |
|----------------------|---|--------------------------|
| AMEAL HALE BROWN | 0 | IN THE CIRCUIT COURT OF |
| COMPLAINANT | 0 | BALDWIN COUNTY, ALABAMA, |
| VS | 0 | IN EQUITY |
| WILLIAM EUGENE BROWN | 0 | |
| RESPONDENT | 0 | |

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

Your Complainant, Ameal Hale Brown, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent married at Pascagoula, Mississippi, on June 1, 1957, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit, September 1, 1957.

3.

That on to-wit, September 1, 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 Eugene Brown party Respondent to this cause of action, 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; that your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Walters & Brantley

BY:

Sam J. Walters, Jr.
Solicitors for the Complainant

RECORDED

4466

Daphne

AMEAL HALE BROWN

COMPLAINANT

VS

WILLIAM EUGENE BROWN

RESPONDENT

ived 29 day of Dec 1958
on 31 day of Dec 1958

ved a copy of the within Bill Compt
William Eugene Brown

ervice on William Eugene Brown

TAYLOR WILKINS, Sheriff

By *Daphne* D. S.

Sherriff claims 54 miles at

Ten Cents per mile Total 5.40

TAYLOR WILKINS, Sheriff

BY *Alice J. Duck*

DEPUTY SHERIFF

BILL OF COMPLAINT

FILED

DEC 29 1958

ALICE J. DUCK, Register

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Ameal Hale Brown

, Complainant

vs.

William Eugene Brown

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Ex 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 Ameal Hale Brown is forever divorced from the said William Eugene Brown for and on account of Cruelty

It is futher 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 futher 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 futher ordered that Ameal Hale Brown the Complainant pay the cost herein to be taxed, for which executed may issue.

This 5 day of February 1959

Hubert M. Hare

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

Ameal Hale Brown

Complainant

vs.

William Eugene Brown

Respondent

DIVORCE DECREE

FILED

FEB 5 1959

ALICE J. DUCK, Register

AMEAL HALE BROWN

COMPLAINANT

VS

WILLIAM EUGENE BROWN

RESPONDENT

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 examined Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

William Eugene Brown

STATE OF ALABAMA
BALDWIN COUNTY

I, Evelyn Watts, a Notary Public, in and for said County, in said State, hereby certify that William Eugene Brown, 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 28 day of January, 1959.

Evelyn Watts
Notary Public

RECORDED

AMEAL HAILE BROWN

COMPLAINANT

VS

WILLIAM EUGENE BROWN

RESPONDENT

ANSWER AND WAIVER

FILED

FEB 5 1959

ALICE J. DUCK, Register

4466