

WILLIE VERN WRIGHT,

Complainant and Cross-Respondent,

-vs-

JAMES CAREY WRIGHT,

Respondent and Cross-Complainant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 3701

Comes the Respondent, James Carey Wright, and withdraws and declares void and of no force and effect, his Answer and Cross-Bill, and Amendments thereto, heretofore filed in said cause.

Respondent further shows unto the Court the following:-
That he waives notice of the filing of interrogatories in said cause, the right to cross same, waives notice of the taking of testimony and consents that the cause may be submitted for final Decree.

And for answer to the Bill of Complaint, Respondent says:-

1. He admits the allegations contained in Paragraph 1 of said Bill of Complaint.
2. He admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. He denies each and every allegation contained in Paragraph 3 of said Bill of Complaint and demands strict proof thereof.
4. He denies the allegation of Paragraph 4 of said Bill of Complaint and demands strict proof thereof.
5. He denies the allegation of Paragraph 5 of said Bill of Complaint and demands strict proof thereof.
6. He denies the allegation of Paragraph 6 of said Bill of Complaint and demands strict proof thereof.

J. C. Wright
Respondent

[Signature]
Attorney for Respondent

FILED

AUG 7 1956

ALICE J. DUCK, Register

WILLIE VERN WRIGHT,
 Complainant and Cross-
 Respondent,
 VS.
 JAMES CAREY WRIGHT,
 Respondent and Cross-
 Complainant.

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IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA.
 IN EQUITY. NO. _____

NOTICE OF TAKING OF DEPOSITION UPON ORAL EXAMINATION

TO: HONORABLE CECIL G. CHASON, FOLEY, ALABAMA, SOLICITOR FOR
 THE RESPONDENT AND CROSS-COMPLAINANT, JAMES CAREY WRIGHT:

Please take notice that at 2:00 o'clock p.m., Central Stand-
 ard Time, on Tuesday, the 21st day of August, 1956, the said
 WILLIE VERN WRIGHT, Complainant and Cross-Respondent in the above
 styled cause, will take the testimonies of W.E. PIPER, MICKEY
 SASSER, AND CHARLES DELK, whose addresses are, % Allied Secret
 Service, Inc., 130 North Anne Street, Mobile, Alabama, in the
 Office of the Court Reporter of the 28th Judicial Circuit of Ala-
 bama, in the Baldwin County Courthouse, at Bay Minette, Alabama,
 upon oral examination pursuant to an Act of the Legislature of the
 State of Alabama, designated as Act No. 375, Regular Session, 1955,
 approved September 8, 1955. The Oral Examination will continue
 from day to day until completed and you are invited to attend and
 to cross-examine if you so desire.

Telfair J. Mashburn, Jr.
 SOLICITOR FOR COMPLAINANT AND CROSS-
 RESPONDENT.

I, Telfair J. Mashburn, Jr., Solicitor for the Complainant
 and Cross-Respondent in the above styled cause, do hereby certify
 that I have served the above and foregoing notice of taking the
 deposition's of W.E. Piper, Mickey Sasser, and Charles Delk, upon
 oral examination, by mailing a copy thereof to HONORABLE CECIL G.
 CHASON, Solicitor for the Respondent and Cross-Complainant, JAMES
 CAREY WRIGHT, at his Office Address, Foley, Alabama, by United
 States Mail, Postage Prepaid, on this the 18th day of July,
 1956.

Telfair J. Mashburn, Jr.

FILED
 JUL 18 1956
 ALICE J. DUCK, Register

WILLIE VERN WRIGHT,
Complainant,
-vs-
JAMES CAREY WRIGHT,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY
NO. 3701

Comes the Respondent, James Carey Wright, and files this his Ammended Answer to the Ammended Bill of Complaint heretofore filed in said cause, and shows unto the court the following:-

1. That he admits the allegation of Paragraph One of the Ammended Bill of Complaint.
2. That he admits the allegations of Paragraph Two of the Ammended Bill of Complaint.
3. That he denies the allegations of Paragraph Three of the Ammended Bill of Complaint and demands strict proof thereof; that he also shows to the Court that Paragraph Three of the Ammended Bill of Complaint alleges the Respondent to have committed actual violence on the person of the Complainant on the 15th day of February, 1952, and also alleges that they lived together as husband and wife until the 15th day of August, 1955, therefore, Respondent shows that this suit is barred by the Equitable Doctrine of Laches.
4. Respondent admits that there was born of this marriage one child, James Wallace Wright, who is approximately three and one-half years of age, but denies that the Complainant is a fit and proper person to have the care, custody and control of this child and denies all allegations of Paragraph Four of the Ammended Bill of Complaint not herein specifically admitted and demands strict proof thereof.
5. Respondent admits that two Lots in Bear Point Estates are being or have been purchased, but denies that the Complainant has assisted in paying for said Lots, and denies that she owns any furniture and denies all of Paragraph Five of the Ammended Bill of Complaint not herein specifically admitted and demands strict proof thereof.
6. Respondent admits that the Complainant is gainfully employed, but denies that she is without funds and denies that she

is entitled to any sum for support or with which to pay her Solicitor of Record. Respondent denies all allegations of Paragraph Six not herein specifically admitted and demands strict proof thereof.

The Respondent having answered the Ammended Bill of Complaint of the Complainant, prays that this, his Answer, may be taken as a Cross Bill and Avers and shows unto the Court the Following:-

7. That Cross Complainant James Carey Wright and Cross Respondent Willie Vern Wright are both over the age of twenty-one years and are both bona fide resident citizens of Baldwin County, Alabama.

8. That Cross Complainant and Cross Respondent were married on or about, to-wit, April 16, 1950, and lived together as husband and wife until about the 15th day of August, 1955.

9. That the Cross Respondent, Willie Vern Wright, has since marriage committed adultery with one, Clarence Steadham, which said act or acts were not condoned by the Cross Complainant.

10. That there was born of this marriage one child, James Wallace Wright, age approximately three and one-half years, who is now in the custody and control of the Cross Respondent, however, Cross Complainant alleges that she is not a fit and proper person to have custody and control. In this connection Cross Complainant alleges that the Respondent spends very little time with the minor child; that almost every evening she is away from home in the company of the said Clarence Steadham; that she returns very late; that she brings into the home and into the presence of the minor child this man with whom she associates and is alleged to have committed adultery, setting thereby a very bad example and being detrimental to the best of the minor child; that her actions are such and have been such for sometime that it is clearly indicated that she lacks the love and affection which would be necessary to give said child a proper home; that, further, Cross Complainant believes that she will continue her association with the said Clarence Steadham, and that she is not a fit and proper person to associate with or have any part in the bringing up of the child of this marriage. Cross Complainant further alleges that he is a fit and proper person to have custody of said minor

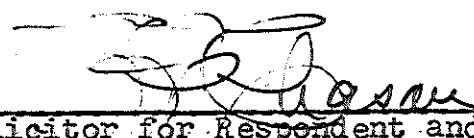
(second page)

child, and that he has a Christian home with good environment in which said child may be housed and reared.

11. Cross Complainant shows unto the Court that he has paid sums as were paid on the two Lots in Bear Point Estates in Baldwin County, Alabama; that he considers the furniture presently used by the Cross Respondent to be his property, and that inasmuch as he believes the marriage vows taken by the Cross Respondent to have been totally flaunted and disregarded, and inasmuch as the rings placed upon the finger of the Cross Respondent at the time of marriage were thereon placed with the understanding that the Cross Respondent would be a proper wife; Cross Complainant therefore claims ownership of these rings.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, the Cross Complainant prays that this, his Ammended Answer may be taken as a Cross Bill, and that Willie Vern Wright shall be made a party Cross Respondent, and that she shall be required to plead, answer, or demur to the same within the time required by law, and the Statutes in such cases made and provided, and that upon a final hearing of this Cross Complaint, Complainant prays that your Honor will make and enter a Decree divorcing your Complainant from said Respondent, granting to your Complainant the care, custody and control of the minor child of this marriage, namely, James Wallace Wright, and will deny the Cross Resppndent a right of re-marriage, and decree that the Lots of Bear Point Estates, the furniture, fixtures and equipment bought by the Cross Complainant during marriage, and the rings bought by the Cross Complainant immediately prior tomarrriage, and all property of the Cross Complainant, and direct that such items be turned over to him, and that conveyance be made to him for any interest Cross Respondent may have in the Bear Point Estate property, and that there should be granted to him such other, further, different and general relief to which he may be entitled, and as in duty bound, he will ever pray.


Solicitor for Respondent and Cross
Complainant

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|---------------------|---|--------------------------|
| WILLIE VERN WRIGHT, |) | |
| |) | |
| Complainant, |) | |
| |) | IN THE CIRCUIT COURT OF |
| VS. |) | BALDWIN COUNTY, ALABAMA. |
| |) | |
| JAMES CAREY WRIGHT, |) | IN EQUITY. NO. 3701 |
| |) | |
| Respondent |) | |

Comes the Respondent in the above styled cause and in answer to the Ammended Bill of Complaint heretofore filed therein denies separately and severally the allegation of each separate and several count, and demands strict proof thereof.

As further answer to the Ammended Bill of Complaint, Respondent shows that the Ammended Bill of Complaint alleges the Respondent to have committed actual violence on her person on February 15, 1952, and that they lived together as husband and wife until August 15, 1956, therefore Respondent shows that the suit is barred by latches.

As further answer to the Bill of Complaint heretofore filed, Respondent says that the Complainant is not a fit and proper person to have the care, custody and control of the minor child of this marriage.



 Solicitor for Respondent

3701

ANSWER

WILLIE VERNE WRIGHT,
Complainant
VS
JAMES CAREY WRIGHT,
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED
MAY 21 1956
ALICE L. DICK, Register



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WILLIE VERN WRIGHT,
Complainant,
VS.
JAMES CAREY WRIGHT,
Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

Comes WILLIE VERN WRIGHT, the complainant in the above styled cause and amends her bill of complaint heretofore filed in said cause so that, as amended, said bill of complaint reads as follows:

1. That your complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona fide resident of said State for more than ten years next preceding the filing of this bill of complaint; that the respondent is over the age of twenty-one years and resides in Baldwin County, Alabama;

2. That your complainant and the respondent were lawfully married on or about, to-wit: the 16th day of April, 1950, at Bay Minette, Alabama;

3. That on, to-wit: the 15th day of February, 1952, at a time when your complainant was pregnant with their child, the respondent assaulted, struck and beat your complainant with a heavy belt and belt buckle so badly as to cause her to almost have a miscarriage; that, at about the same time, he threatened to kill her with his pocket knife; that, on many occasions since that time, the respondent has cursed, abused and threatened to do physical violence to the person of your complainant; that, because of his actions and threats, your complainant has become reasonably convinced that, should she continue to live with him as his wife, he will carry out his threats and do further actual physical violence to her person which would necessarily endanger her life or health; that, because of his treatment of her, your complainant was forced to leave the bed and board of the respondent, on, to-wit: the 15th day of August, 1956, and she has not since that time returned to live with him as his wife.

4. That there was born of this marriage one child, JAMES WALLACE WRIGHT, a little boy, three and one-half years of age; that your complainant is a fit and proper person to have the care, custody and control of this child; and that the respondent is not a fit and

proper person to have the care, custody and control of said minor child; that the respondent became angry at the time your complainant became pregnant with said child; that he remained angry and displeased during the entire gestation period; that, at the time said child was born, the respondent abandoned your complainant and said child and remained away for about nineteen months; and that, with the exception of One Hundred and Five (\$105.00) Dollars, the respondent has never contributed to the support and maintenance of said child except as he was forced to do so by the Courts;

5. That your complainant and the respondent own two lots in Bear Point Estates, a Subdivision in Baldwin County, Alabama, and that your complainant has assisted in paying what has been paid on the purchase price of said lots; that they own certain furniture in a house which was provided for them by your complainant's Father;

6. That your complainant works but that she is without funds because she has been forced to expend all of her funds on her own living expenses, because of the refusal of the respondent to support her, and on the support and maintenance of their minor child; that the respondent is strong and able-bodied and has a good job with the Louisville & Nashville Railroad Company, earning approximately Four Hundred (\$400.00) Dollars per month; that he is financially able to contribute to the support of your complainant and their child; and that your complainant does not have a sufficient amount of money out of which to pay her Solicitor for prosecuting this suit and that she has employed Telfair J. Mashburn, Jr., Attorney at Law, Bay Minette, Alabama, as her Solicitor to prosecute this suit.

PRAYER FOR PROCESS

THE PREMISES CONSIDERED, your complainant makes the said JAMES CAREY WRIGHT a party respondent to this amended bill of complaint and, in order that she may have the relief hereinafter prayed for, may it please your Honor to cause service of this Amended Bill of Complaint to be had on the said respondent in accordance with the law and the practice of this Honorable Court, commanding him to plead, answer or demur to this Amended Bill of Complaint within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

Your complainant further prays that, on a final hearing of

this cause, your Honor will make and enter a decree divorcing your complainant from said respondent; granting to your complainant the care, custody and control of their minor son, JAMES WALLACE WRIGHT; fixing a reasonable sum for the respondent to pay to your complainant monthly for the support and maintenance of your complainant and her said minor child; awarding to your complainant title to their furniture and to the two lots they own at Bear Point Estates; and fixing a reasonable sum for the respondent to pay to your complainant's Solicitor for his services in this cause; and, if your complainant is mistaken in the relief in which she has asked, or to which she is entitled, then she prays for such other, further, different or general relief as, in equity and good conscience, she may be entitled to receive, and, as in duty bound, she will ever pray, etc.

Jeffrey A. Mashburn, Jr.
SOLICITOR FOR COMPLAINANT

I hereby certify that I have this 24th day of April, 1956, mailed a copy of this Amended Bill of Complaint to the Hon. Cecil Chason, Solicitor for the Respondent in a stamped envelope addressed to him at Foley, Alabama.

Jeffrey A. Mashburn, Jr.
Solicitor for the Complainant

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 3701

WILLIE VERN WRIGHT,
Complainant,

VS.

JAMES CAREY WRIGHT,
Respondent.

FILED

APR 21 1956

AMENDED BILL OF COMPLAINT.

WILLIE VERN WRIGHT,)
 Complainant,) IN THE CIRCUIT COURT OF
 VS.) BALDWIN COUNTY, ALABAMA.
 JAMES CAREY WRIGHT,) IN EQUITY. NO _____
 Respondent.)

Comes the Respondent in the above styled cause and demurs to the aspect of the Bill alleging grounds for divorce, being paragraph three thereof, and as grounds for demurrer separately and severally assigns the following:

1. That the Complainant is barred by laches from proceeding under an allegation based upon alleged cruelty occurring on the 15th day of February, 1952.

2. That said aspect of the Bill contains no equity.

3. Said aspect of the Bill is prolix and irrevelant.

Respondent now demurs to the aspect of the Bill seeking custody of the minor child, that being paragraph four thereof, and as grounds for demurrer separately and severally assigns the following:

1. There is no equity in the aspect of the Bill.

2. That said aspect of the Bill is prolix and irrelevant.

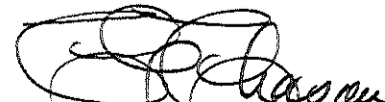
3. That said aspect of the Bill contains mere conclusions of the pleader.

Respondent now demurs to that aspect of the Bill seeking alimony, support, maintenance, and attorney's fee, being paragraphs five and six thereof, and as grounds for demurrer separately and severally assigns the following:

1. There is no equity in the aspect of the Bill.

2. This aspect of the Bill is prolix and irrevelant.

3. That the allegation "that your Complainant has assisted in paying what has been paid on the purchase price of the said lots" is vague and indefinite.


 Solicitor for Respondent

3701

DEMURRER

WILLIE VERN WRIGHT,

Complainant,

- vs -

JAMES CAREY WRIGHT,

Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

NO. _____

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FILED

FEB 29 1956

ALICE J. DUCK, Clerk

FILED

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 3701

Jan. TERM, 1956

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon

JAMES CAREY WRIGHT

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

JAMES CAREY WRIGHT

Defendant

by

WILLIE VERN WRIGHT

Plaintiff

Witness my hand this 19 day of Jan. 1956

Alice J. Neely, Clerk

BOOK 020 PAGE 176

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made 2/9/56

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...

No. 3701

Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT

WILLIE VERN WRIGHT

Plaintiffs

vs.

JAMES CAREY WRIGHT

Defendants

SUMMONS and COMPLAINT

Filed Jan. 19, 19 56

Alice J. Duck, Clerk

Telfair J. Mashburn, Jr.
Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

RECEIVED IN OFFICE

Jan. 19, 19 56

Taylor Wilkins, Sheriff

I have executed this summons

this 24 Jan, 19 56
by leaving a copy with

James Carey Wright

Sheriff claims 26 miles at

Ten Cents per mile Total \$ 2.60
TAYLOR WILKINS, Sheriff

BY Branger
DEPUTY SHERIFF

Taylor Wilk Sheriff

J. Branger Deputy Sheriff

Purdido

BOOK 150 PAGE 130

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|---------------------|---|--------------------------|
| WILLIE VERN WRIGHT, | 0 | |
| | 0 | |
| Complainant, | 0 | IN THE CIRCUIT COURT OF |
| VS. | 0 | BALDWIN COUNTY, ALABAMA. |
| JAMES CAREY WRIGHT, | 0 | IN EQUITY. NO. _____ |
| | 0 | |
| Respondent. | 0 | |

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

Comes your complainant, WILLIE VERN WRIGHT, and presents this her bill of complaint against the respondent, JAMES CAREY WRIGHT, and, thereupon complaining, respectfully represents and shows unto your Honor and this Honorable Court the following facts as a basis for the relief hereinafter prayed for:

1. That your complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona fide resident of said State for more than ten years next preceding the filing of this bill of complaint; that the respondent is over the age of twenty-one years and resides in Baldwin County, Alabama;

2. That your complainant and the respondent were lawfully married on or about, to-wit: the 16th of April, 1950, at Bay Minette, Alabama;

3. That, on, to-wit: the 15th day of February, 1952, at a time when your complainant was carrying their child, the respondent assaulted, struck and beat your complainant with a heavy belt and belt buckle so badly as to cause her to almost have a miscarriage; that at about that same time he threatened to kill her with his pocket knife; that, on many occasions since that time, the respondent has cursed, abused and threatened to do physical violence to the person of your complainant; that, because of his actions and threats, your complainant has become reasonably convinced that, should she continue to live with him as his wife, he will do further actual physical violence to her person which would necessarily endanger her life or health;

4. That there was born of this marriage one child, JAMES WALLACE WRIGHT, a little boy, three and one-half years of age; that your complainant is a fit and proper person to have the care, custody and control of this child; that the respondent is not a fit and

proper person to have the care, custody and control of said minor child; that the respondent became angry at the time your complainant became pregnant with said child; that he remained angry and displeased during the entire gestation period; that, at the time said child was born, the respondent abandoned your complainant and said child and remained away for about nineteen months; and that, with the exception of One Hundred and Five (\$105.00) Dollars, the respondent has never contributed to the support and maintenance of said child except as he was forced to do so by the Courts;

5. That your complainant and the respondent own two lots in Bear Point Estates, a Subdivision in Baldwin County, Alabama, and that your complainant has assisted in paying what has been paid on the purchase price of said lots; that they own certain furniture in a house which was provided for them by your complainant's Father;

6. That your complainant works but that she is without funds because she has been forced to expend all of her funds on her own living expenses, because of the refusal of the respondent to support her, and on the support and maintenance of their minor child; that the respondent is strong and able-bodied and has a good job with the Louisville & Nashville Railroad Company, earning approximately Four Hundred (\$400.00) Dollars per month; that he is financially able to contribute to the support of your complainant and their child; and that your complainant does not have a sufficient amount of money out of which to pay her Solicitor for prosecuting this suit and that she has employed Telfair J. Mashburn, Jr., Attorney at Law, Bay Minette, Alabama, as her Solicitor to prosecute this suit.

PRAYER FOR PROCESS

THE PREMISES CONSIDERED, your complainant makes the said JAMES CAREY WRIGHT a party respondent to this bill of complaint and, in order that she may have the relief hereinafter prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said JAMES CAREY WRIGHT, commanding him to plead, answer or demur to this bill of complaint within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

Your Complainant further prays that, on a final hearing of

this cause, your Honor will make and enter a decree divorcing your complainant from said respondent; granting to your complainant the care, custody and control of their minor son, JAMES WALLACE WRIGHT; fixing a reasonable sum for the respondent to pay to your complainant monthly for the support and maintenance of your complainant and her said minor child; awarding to your complainant title to their furniture and to the two lots they own at Bear Point Estates; and fixing a reasonable sum for the respondent to pay to your complainant's Solicitor for his services in this cause; and, if your complainant is mistaken in the relief for which she has asked, or to which she is entitled, then she prays for such other, further, different or general relief as, in equity and good conscience, she may be entitled to receive, and, as in duty bound, she will ever pray, etc.

J. J. A. Madhury, Jr.
SOLICITOR FOR COMPLAINANT

No. 3701

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

WILLIE VERN WRIGHT

Complainant—

vs.

James CAREY WRIGHT

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

JAMES RAY OWEN

WITNESSES:

WILLIE VERN WRIGHT,

Complainant and Cross-
Respondent,

VS.

JAMES CAREY WRIGHT,

Respondent and Cross-
Complainant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 3701

NOTICE OF TAKING OF DEPOSITION UPON ORAL EXAMINATION

TO: HONORABLE CECIL G. CHASON, FOLEY, ALABAMA, SOLICITOR FOR
THE RESPONDENT AND CROSS-COMPLAINANT, JAMES CAREY WRIGHT:

Please take notice that at 1:30 P. M. o'clock, Central Standard Time, on Tuesday, the 19th day of June, 1956, the said WILLIE VERN WRIGHT, Complainant and Cross-Respondent in the above styled cause, will take the testimony of JAMES CAREY WRIGHT, whose address is Perdido, Alabama, in the Office of the Court Reporter of the 28th Judicial Circuit of Alabama, in the Baldwin County Courthouse, at Bay Minette, Alabama, upon oral examination pursuant to an Act of the Legislature of the State of Alabama, designated as Act No. 375, Regular Session, 1955, approved September 8, 1955. The Oral Examination will continue from day to day until completed and your are invited to attend and to cross-examine if you so desire.

Telfair J. Mashburn, Jr.
SOLICITOR FOR COMPLAINANT AND CROSS-
RESPONDENT.

I, Telfair J. Mashburn, Jr., Solicitor for the Complainant and Cross-respondent in the above styled cause, do hereby certify that I have served the above and foregoing notice of taking the deposition of James Carey Wright, upon oral examination, by mailing a copy thereof to HONORABLE CECIL G. CHASON, Solicitor for the Respondent and Cross-Complainant, JAMES CAREY WRIGHT, at his Office Address, Foley, Alabama, by United States Mail, Postage Prepaid, on this the 6th day of June, 1956.

Telfair J. Mashburn, Jr.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 3701

WILLIE VERN WRIGHT,

Complainant and
Cross-Respondent,

VS.

JAMES CAREY WRIGHT,

Respondent and
Cross-Complainant.

NOTICE OF TAKING OF DEPOSITION
UPON ORAL EXAMINATION.

FILED

JUN 6 1956

ALICE J. DUCK, Register

WILLIE VERN WRIGHT

Complainant

vs.

JAMES CAREY WRIGHT

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

No. 3701

DEMAND FOR ORAL EXAMINATION

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from Bay
Minette, in the County of Baldwin
Alabama, the place of trial of said cause, to-wit: WILLIE VERN WRIGHT

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

Jelaine J. Madibury
Solicitor for Complainant

NOTE:

Complainant suggests the name of JAMES RAY OWEN
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Jelaine J. Madibury
Solicitor for Complainant.

FILED
AUG 7 1956
ALICE J. DUCK, Register

DEMAND FOR ORAL EXAMINATION

Complainant

vs.

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed this _____ day of _____

194_____

Register

Moore Printing Co.

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

WILLIE VERN WRIGHT

Complainant

VS.

JAMES CAREY WRIGHT

Respondent

JAMES R. OWEN

I,

as ~~Register and~~ Commissioner

WILLIE VERN WRIGHT

have called and caused to come before me

witness named in the Requirement for Oral Examination, on the _____ day of September

19 56, at the office of Telfair J. Mashburn, Jr.

in Bay Minette, Alabama, and having first sworn said Witness to speak the

truth, the whole truth, and nothing but the truth, the said WILLIE VERN WRIGHT

doth depose and say as follows: My name is Willie Vern Wright. I am the complainant in this cause and I am over the age of twenty-one years. I am a resident citizen of Baldwin County, Alabama. The respondent, James C. Wright, is over the age of twenty-one years and resides in Baldwin County, Alabama. I have been a bona fide resident citizen of Baldwin County, Alabama, for more than ten years next preceding the filing of the bill of complaint in this cause. I was married to James Carey Wright at Bay Minette, Alabama, on the 16th day of April, 1950. On or about the 15th day of February, 1952, at a time when I was pregnant, the respondent struck and beat me with a heavy belt buckle and injured me so severely that I almost had a miscarriage. After this incident, we were separated for a long time, but, finally, on his promises to do better, and because of our baby son who was born in the meanwhile, I returned to live with him as his wife. He soon began mistreating me again and in December of 1952 he beat me so severely that I did have a miscarriage. Finally, about the middle of August, 1955, because of his repeated threats and abuse, I became convinced that, should I continue to live with him as his wife, he would do further actual physical violence to me person which would be dangerous to my life or health. I left him at that time and have not since returned to live with him as his wife. We have one child as a result of this marriage, an infant son, JAMES WALLACE WRIGHT, who is now four years of age. I am a fit and proper person to have the care, custody and control of said child, and the respondent, JAMES C. WRIGHT, IS not a fit and proper person to have the care, custody and control of said child. The respondent has never cared for the said child. I have had to support and maintain the child all of its life with very little help from its Father. We have settled between ourselves the question of property rights, support and maintenance and Solicitor&s fees." Further Deponent says not.

Willie Vern Wright

FILED

AUG 7 1956

Alice J. Duck, Register

ORAL EXAMINATION

I, JAMES R. OWEN, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition... on Oral Examination was taken down by me in writing in the words of the witness... and read over to her and she signed the same in the presence of myself and Telfair J. Mashburn, Jr.

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 7th day of September, 1956

James R. Owen (L. S.)

No. _____ Page _____

The State of Alabama
Baldwin County.

In Circuit Court, In Equity

Willie Vera Wright

vs. Complainant

James Casey Wright

Respondent

Oral Deposition

Filed _____, 19____

Register

Recorded in

Record

Vol. _____ Page _____

Register

WILLIE VERN WRIGHT

vs.

JAMES CAREY WRIGHT

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, AS
Last Amended, Answer and Waiver of Respondent, and Testimony of
Willie Vern Wright.

and in behalf of Defendant upon Answer and Waiver

James J. Mathews

FILED

AUG 7 1956

ALICE J. DUCK, Register

Alice J. Duck
Register.

No. 3701.....

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Wright

vs.

Wright

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

Register.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

WILLIE VERN WRIGHT, Complainant

vs.

JAMES CAREY WRIGHT, Respondent

As Last Amended,

This cause coming on to be heard was submitted upon Bill of Complaint/Decree Pro Conesso 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

WILLIE VERN WRIGHT is forever divorced from the said JAMES CAREY WRIGHT for and on account of

"CRUELTY"

It is further ORDERED, ADJUDGED AND DECREED that the Complainant, WILLIE VERN WRIGHT, be, and she is hereby, awarded permanent care, custody and control of the infant son of this marriage, JAMES WALLACE WRIGHT.

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

This 10th day of September 19 56

Hubert M. Hall 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

Complainant

vs.

Respondent

DIVORCE DECREE

Filed
9-10-66
Gene J. Runc
TR

CECIL G. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

Feb. 27, 1956

Mrs. Alice J. Duck
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing demurrers in the case
of Wright vs. Wright, No. 3701 in Equity, a
copy of which I am this day sending to Tel-
fair J. Mashburn.

Yours very truly,



C. G. Chason

CGC:dc

Encl. 1