

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

HATTIE THOMPSON

Complainant

vs.

HENRY THOMPSON

Respondent

DIVORCE DECREE

FILED
APR 5 1956
LICE J. ROCK, Register

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

HATTIE THOMPSON

Complainant,

Vs.

HENRY THOMPSON

Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent
Henry Thompson

by the Sheriff of Baldwin County, on the 21th day of February,
1946.

And it further appears to the Register, that the said Henry Thompson

_____, the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of C. LeNoir Thompson Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said Henry Thompson

This 31 day of March, 1946.

George A. LeNoir
Register.

No. _____

**CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY**

HATTIE THOMPSON

Complainant,

Vs.

HENRY THOMPSON

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this _____ day of _____,

194_____.

Register.

8600 Motion for Decree Pro Confesso on Personal Service. 3107 Code

MPCO.

THE STATE OF ALABAMA, }
Baldwin County } No. _____ Circuit Court, In Equity.

HATTIE THOMPSON _____ Complainant...

Vs.

HENRY THOMPSON _____ Defendant....

Motion is hereby made for a Decree Pro Confesso against Henry Thompson

_____ Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant... ha failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This _____ day of _____ 19__

C. Davis Thompson

Solicitor.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

HATTIE THOMPSON

Vs.

HENRY THOMPSON

Motion for Decree Pro Confesso on
Personal Service

Filed 3 - 31 1957

W. J. ...
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

STATE OF ALABAMA
BALDWIN COUNTY

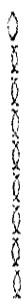
TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Henry Thompson, 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 Hattie Thompson, as Complainant and against Henry Thompson as Respondent.

WITNESS my hand this the 22 day of Jan, 1956.

Alice J. Duck
Register.

HATTIE THOMPSON
COMPLAINANT
VS
HENRY THOMPSON
RESPONDENT



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

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

Your Complainant, Hattie Thompson, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and is a bona fide resident of Baldwin County, Alabama, the Respondent is over the age of 21 and is a bona fide resident of Baldwin County, Alabama.

2.

That your Complainant and the Respondent married at Bay Minette, Baldwin County, Alabama on August 15, 1932, and lived together as husband and wife until on to-wit, May 20, 1955.

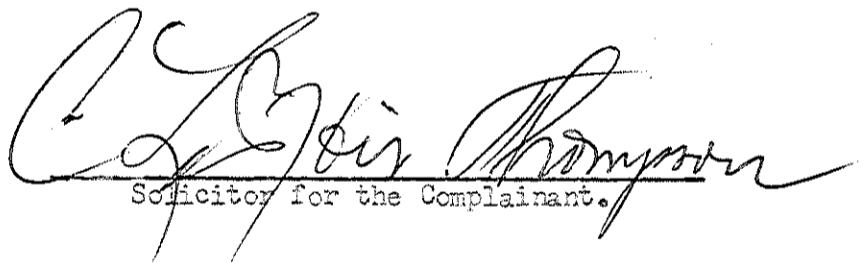
3.

That on May 20, 1955, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

There was born as fruits of this marriage between the Complainant and the Respondent four children, Ausburn Thompson age 14, Raymond Douglas Thompson age 12, Vernelle Thompson age 11, and Donald Eugene Thompson, age 9, 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 Henry Thompson, 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; that a decree be made awarding to the Complainant the custody, care and control of the minor children, Ausburn Thompson, age 14, Raymond Douglas Thompson age 12, Vernelle Thompson, age 11, and Donald Eugene Thompson age 9; 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.

3729

HATTIE THOMPSON
COMPLAINANT
VS
HENRY THOMPSON
RESPONDENT

Received 23 day of Feb 1956
and on 24 day of Feb 1956
I served a copy of the within doc
on Henry Thompson

By service on _____
TAYLOR WILKINS, Sheriff
By W.A. Tolbert D.
0 miles

SUMMONS AND COMPLAINT

FILED
FEB 22 1956
ALICE J. DUCK, Clerk

From the Law Offices of
C. LeNoir Thompson
Attorney-At-Law
Bay Minette, Alabama

77823

HATTIE THOMPSON

vs.

HENRY THOMPSON

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,
Testimony of Hattie Thompson and Mrs. Jessie Shafer, Decree Pro Confesso
on personal service and Motion for Decree Pro Confesso on personal service.

and in behalf of Defendant upon

C. L. Davis Thompson

Amos J. Lewis

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

HATTIE THOMPSON

vs.

HENRY THOMPSON

NOTE OF TESTIMONY

Filed in Open Court this 2

day of April, 1947

Acie J. Houch
Register.

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: LOIS HOWARD

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 Hattie Thompson and Mrs. Jessie Shafer

a witnesses in behalf of Hattie Thompson in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Hattie Thompson

Complainant

and Henry Thompson

Respondent

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

Witness 2 day of April, 1956

Alvin J. Dwyer
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

HATTIE THOMPSON

Complainant

VS.

HENRY THOMPSON

Respondent

I, Lois Howard

as Register and Commissioner

have called and caused to come before me Hattie Thompson and Mrs. Jessie Shafer

witnesses named in the Requirement for Oral Examination, on the 2nd day of April
1956, at the office of C. LeNoir Thompson

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 Hattie Thompson and Mrs.
Jessie Shafer doth depose and say as follows:

That my name is Hattie Thompson I am over the age of 21 and a resident of Baldwin County, Alabama and have been all my life. The Respondent Henry Thompson is also over the age of 21 and a resident of Baldwin County, Alabama. We were married in Bay Minette on August 25, 1932 and lived together as husband and wife until Friday night May 20, 1955. The cause for the separation has been the abuse and mistreatment put on me by the Respondent. The respondent Henry Thompson has beaten and abused me from time to time when he would be drinking and he has been drinking regularly on week-ends for a long time. We have been separated frequently because of his drinking and more particularly his abusing me until finally he beat me about the face and leaving black and blue marks on my face with no fault on my part. I became in fear of my life or health and I know I can not live with him any longer as his wife, for that reason I respectfully ask this Honorable Court for a divorce. I respectfully ask this Honorable Court for an order providing that the respondent shall provide as support for the four children a sum of not less than \$50.00 a month which is about as much as he has been doing. I know I can never live with him again as his wife. I submit to this Honorable Court that I am a fit suitable and proper person to have the care, custody and control of the four children fruits of our marriage who are: Auburn Thompson, age 14, Raymond Douglas Thompson, age 12, Vernelle Thompson, age 11, and Donald Eugene, age about 9.

Hattie Thompson

That my name is Mrs. Jessie Shafer, I know both parties to this cause. They are both over the age of 21 years and are residents of Baldwin County, Alabama and have been all their lives. They were married in Bay Minette on August 25, 1932 and lived together as husband and wife until on or about Friday night May 20, 1955. This was the last of many separations. The cause being that the Respondent would come home drinking, beat and abuse not only his wife, Hattie, but the entire family. His beatings which left black and blue marks about the face and body of all of the family became so bad that the Complainant in this cause became in fear of her life or health and left him. I respectfully recommend the Complainant, Hattie Thompson, as being a fit, suitable and proper person to have the care custody and control of those children, fruits of the marriage between the parties, who are yet minors and they are: Auburn Thompson, age 14, Raymond Douglas Thompson, age 12, Vernelle Thompson, age 11, and Donald Eugene, age about 9.

Mrs. Jessie Shafer

3729

ORAL EXAMINATION.

I, Lois Howard, 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 es and read over to them and they signed the same in the presence of myself and C. LeNoir Thomson at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witnesses; 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 envelope to the Register of said Court.

Given under my hand and seal, this 2nd day of April, 1956

Lois Howard (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

HATTIE THOMPSON

vs. Complainant

HENRY THOMPSON

Respondent.

Oral Deposition

Filed 4-2, 1956

Lois Howard Register.
Recorded in

Record

Vol. _____ Page _____

Register