

(3742)

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ANNA BLACK HALEY

Complainant

vs.

GERALD HALEY

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree, Pro Confession on Answer & 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 ANNA BLACK HALEY is forever divorced from the said GERALD HALEY for and on account of

CRUELTY:

And Complainant is hereby granted the right to resume her maiden name, ANNA BLACK

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 ANNA BLACK HALEY the COMPLAINANT pay the cost herein to be taxed, for which executed may issue.

This 19th day of March 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. 3747 ----- Page -----

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

ANNA BLACK HALEY

Complainant

vs.

GERALD HALEY

Respondent

**DIVORCE DECREE**

19 1956  
*W. J. ...*

The State of Alabama, }  
Baldwin County. }  
Circuit Court of Baldwin County, Alabama  
(In Equity)

Complainant Anna Black Haley

VS.

Respondent Gerald Haley

I, Virginia Hillhouse

as Register and Commissioner

have called and caused to come before me Anna Black Haley and Peggy Krouse

1956, at the office of Virginia Hillhouse

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

truth, the whole truth, and nothing but the truth, the said Anna Black Haley

and Peggy Krouse both depose and say as follows:

My name is Anna Black Haley. I am over the age of twenty-one years and a resident of Baldwin County, Alabama. I have been a resident of Baldwin County, Alabama, for more than ten years. Gerald Haley is over the age of twenty-one years and resides in Baldwin County, Alabama, or did at the time of our separation.

I married Gerald Haley September 29, 1955, at Pascagoula, Mississippi.

As soon as we were married, Gerald Haley came to my home to live. He quit his job in Pensacola, Florida, one week after we were married. Before that time I never knew of him drinking more than one or two beers at a time. I own and operate a tavern, and he called himself helping me run the tavern, but what he really did was to help himself to the drinks until now he stays drunk nearly all of the time. He has become addicted to habitual drunkenness and has continued up to the time I made him leave and the filing of this bill for divorce.

Anna Black Haley

My name is Peggy Krouse. I am acquainted with Anna Black Haley and Gerald Haley. I have known Anna Black Haley for several years and Gerald Haley for several months before his marriage to Anna Black Haley. Anna Black Haley has lived in Baldwin County, Alabama for the last ten years. Gerald Haley, before their marriage, did not drink excessively, to my knowledge, but since he has been living with Anna Black Haley he has begun drinking quite heavily, and I believe him to be addicted to habitual drunkenness that has continued up to the present time.

Peggy Krouse

ORAL EXAMINATION

I, Virginia Hillhouse, 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 AS...and read over to them...and they...signed the same in the presence of myself

Virginia Hillhouse

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness AS or had proom made before me of the identity of said witness AS; 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 13<sup>th</sup> day of March, 1956

Virginia Hillhouse (L.S.)

No. 3947 Page

The State of Alabama  
Baldwin County.

In Circuit Court, In Equity

Anna Black Haley

vs.

Complainant

Gerald Haley

Respondent

Oral Deposition

Filed \_\_\_\_\_, 19\_\_\_\_

Recorded in \_\_\_\_\_, Register

Recorded in \_\_\_\_\_, Register

Vol. \_\_\_\_\_, Page \_\_\_\_\_, Register

Recorded in \_\_\_\_\_, Register

Recorded in \_\_\_\_\_, Register

FILED  
MAY 1 1956

ANNA BLACK HALEY )  
Complainant )  
VS. )  
GERALD HALEY )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

To Virginia Hillhouse of Foley, in the State of Alabama, Greeting:

Reposing confidence in your integrity, skill and ability, the undersigned does hereby appoint you Commissioner to take oral testimony of the following witnesses: Anna Black Haley and Peggy Krouse, material witnesses for the Complainant in a certain cause or proceeding now pending in said Circuit Court wherein Anna Black Haley is complainant.  
Gerald Haley is respondent.

And you are hereby authorized and empowered to call and cause to come before you the said witnesses, at such time and place as you shall appoint, and their testimony on oath to take orally, touching their knowledge of all matters and things in controversy in said cause or proceeding; and the said testimony when so taken by you shall be certified by you as true and correct as given by the witnesses, and the same you shall, together with this commission return to the undersigned with all convenient speed; and you shall likewise certify the same, under your hand and seal, in all things fully and explicitly, how you have executed this commission.

Witness, the undersigned Register of said Circuit Court in Equity at office in Bay Minette, Alabama, this 13th day of March, 1956.

Register Circuit Court in Equity

  
Register.

3747

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

ANNA BLACK HALEY  
Complainant

VS.

GERALD HALEY  
Respondent

Commission to take Oral  
Testimony

FILED

MAR 14 1956

ALICE J. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

\_\_\_\_\_

Anna Black Haley \_\_\_\_\_

vs. *Complainant* \_\_\_\_\_

Gerald Haley \_\_\_\_\_

*Respondent* \_\_\_\_\_

\_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, \_\_\_\_\_  
 respondent's answer and waiver, appointment of commissioner \_\_\_\_\_  
 to take testimony, and oral depositions of complainant's \_\_\_\_\_  
 witnesses \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

and in behalf of Defendant upon \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*Arthur C. Emerson*  
 Attorney for Complainant

*Verice J. ...*  
 Register.

No. 3747

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

Anna Black Haley

vs.

Gerald Haley

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of **FILED** ....., 194

**MAR 14 1956**

Register.



ANNA BLACK HALEY )  
 Complainant )  
 VS. )  
 GERALD HALEY )  
 Respondent )

IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA  
 IN EQUITY

Comes the respondent in the above-styled cause and accepts service of a bill of Complaint hereto filed in this cause: waives notice of the filing of interrogatories in this cause, and the right to cross same; waives notice of the taking of testimony in said cause and consents that the same may be taken and the cause submitted for final decree,

And for answer to the complaint heretofore filed in this cause the respondent says:

1. He admits the allegations in paragraph one of said bill of complaint.
2. He admits the allegations of paragraph two of said bill of complaint.
3. He denies each and every material allegation contained in paragraph three of the said bill of complaint and requires and demands strict proof thereof.

Gerald Haley  
 Respondent

Margaret M. Krouse  
 Witness

Josephine Allen  
 Witness

3747

ANSWER AND WAIVER

ANNA BLACK HALEY  
Complainant

vs.

GERALD HALEY  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

*Deputy Marshall*

FILED  
MAR 14 1956  
ALICE J. BUCK, Registrar

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

ANNA BLACK HALEY )  
Complainant )  
VS. )  
GERALD HALEY )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

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

Your complainant, Anna Black Haley, respectfully represents and shows unto your Honor:

1. That the 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 two years next preceding the filing of this bill of complaint; that Gerald Haley is over the age of twenty-one years and resides in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, to-wit, September 29, 1955, at Pascagoula, Mississippi.

3. 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; your complainant further avers and alleges that the said respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

The premises considered, your complainant makes the said Gerald Haley a party respondent to this bill of complaint, and in order that complainant may have relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said Gerald Haley, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from said respondent, granting the complainant the right to resume the name of Anna Black; and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray.

*Arthur C. Evers*  
Solicitor for the Complainant

No. 3747

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ANNA BLACK HALEY  
Complainant  
VS.  
GERALD HALEY  
Respondent

BILL OF COMPLAINT

FILED  
MAR 14 1956  
ALICE J. BUCK, RECLERK

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

Anna Black Haley Complainant  
vs.  
Gerald Haley Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

No. ....

### 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  
~~Polk~~ ....., in the County of Baldwin  
Alabama, the place of trial of said cause, to-wit : Anna Black Haley, Complainant.  
vs. Gerald Haley, Respondent

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

Arthur C. Epperson  
Solicitor for Complainant

NOTE:

Complainant suggests the name of Virginia Hillhouse  
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Arthur C. Epperson  
Solicitor for Complainant.

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DEMAND FOR ORAL EXAMINATION

Anna Black Haley

Complainant

vs.

Gerald Haley

Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Filed this FILED day of -----

194... MAR 14 1956

ALICE J. DUCK, Register

Register

Moore Printing Co.

3747