

455

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

-----**MATTIE LOU MCGHEE**-----, Complainant

vs.

-----**COBIE MCGHEE**-----, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~XXXXXXXXXXXXXXXXXXXX~~
-----**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
-----**Mattie Lou McGhee**----- is forever divorced from the
said -----**Cobie McGhee**----- for and on account of
Cruelty.

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 -----**Mattie Lou McGhee**-----
the -----**Complainant**----- pay the cost herein to be taxed, for which executed may issue.

This -----**19th**----- day of -----**March**----- 19-----**19**

-----*Hubert Moore*-----
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.

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No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

MATTIE LOU MCGHEE

Complainant

vs.

COBIE MCGHEE

Respondent

DIVORCE DECREE

FILED

MAR 19 1939

ALICE J. DICK, CLERK
REGISTER

MATTIE LOU MCGHEE

vs.

COBIE MCGHEE

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 Mattie Lou McGhee and Betty Scott

and in behalf of Defendant upon Answer and Waiver

C. L. Thompson

Alice J. Duck

Register.

17
No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

MATTIE LOU MCGHEE

VS.

COBIE MCGHEE

Note of Testimony

Filed in Open Court this _____

FILED

day of _____ **MAR-18-1959**, 19____

ALICE L. DUCK, Register

Register.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

MATTIE LOU MCGHEE

COMPLAINANT

vs.

COBIE MCGHEE

RESPONDENT

I, Lois Wilson

as Register and Commissioner

have called and caused to come before me Mattie Lou McGhee and Betty Scott

witnesses named in the requirement for Oral Examination, on the 12th day of March
19 59 , at the office of C. LeNoirThompson

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

truth, the whole truth, and nothing but the truth, the said Mattie Lou McGhee and Betty Scott

doth depose and say as follows:

That my name is Mattie Lou McGhee, I am over the age of 21 and have been a resident of Alabama all my life. The respondent Cobie McGhee is over the age of 21 and has been a resident of Alabama all his life. We were married April 7, 1946 in Escambia County, Alabama under a license issued April 6, 1946 in Bay Minette, Alabama, and lived together as husband and wife in Alabama until on or about August 10, 1958 at which time I was forced to leave the respondent because of his mistreatment and abuse. From time to time he had struck and beat me threatening to do permanent injury to me and on the occasion of the separation drew his knife and while trying to cut me he cut another person who stopped him from reaching me with the knife. This made me in fear of my life or health and I have never lived together with him as his wife since that date. There is no property to be divided.

Mattie Lou McGhee

That my name is Betty Scott, I know both parties to this cause, they are both over the age of 21 and have been residents of Alabama more than two years next preceding. They were married in Atmore, Alabama on April 7, 1946 and lived together as husband and wife until on or about August 10, 1958. The complainant in fear of her life or health was forced to leave the respondent because he had mistreated and abused her and tried to use a knife on her on the occasion of their separation. I do not believe they will ever live together again as husband and wife.

Betty Scott

ORAL EXAMINATION

I, LOIS WILSON 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 C. LeNoir Thompson at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness esor 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 12 day of March, 19 59 .

Lois Wilson (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

MATTIE LOU MCGHEE

COMPLAINANT

vs.

COBIE MCGHEE

RESPONDENT

ORAL DEPOSITION

Filed MAR 18 1959

ALICE J. DUCK, Register

, 19 _____, Register.

RECORDED IN

Record

Vol. _____ Page _____

, Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: LOIS WILSON

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 Mattie Lou McGhee and Betty Scott

a witness in behalf of Mattie Lou McGhee in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Mattie Lou McGhee

, Complainant

and Cobie McGhee

Respondent

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

Witness 18 day of March

, 1959

Alice J. Luck

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MATTIE LOU MCGHEE

VS. Complainant

COBIE MCGHEE

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LOIS WILSON

WITNESSES:

MATTIE LOU MCGHEE
BETTY SCOTT

FILED
JUN 18 1959
ALICE J. WILKIN, Register

4532

4533

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons COBIE MCGHEE, 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 MATTIE LOU MCGHEE, as Complainant, and against COBIE MCGHEE, as Respondent.

WITNESS my hand this the 18 day of March, 1959.

Alice I. Luck
Register.

MATTIE LOU MCGHEE	*	IN THE CIRCUIT COURT OF
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA.
VS	*	IN EQUITY.
COBIE MCGHEE	*	CASE NO. <u>4532</u>
RESPONDENT	*	

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

Your Complainant, Mattie Lou McGhee, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your complainant is over the age of 21 and a resident of Alabama, and have been all my life; The Respondent is over the age of 21 and a resident of Alabama and have been all his life.

2.

That your complainant and the respondent married in Escambia County, Alabama, on April 7, 1946, and lived together as husband and wife in Alabama, until August 10, 1958.

3.

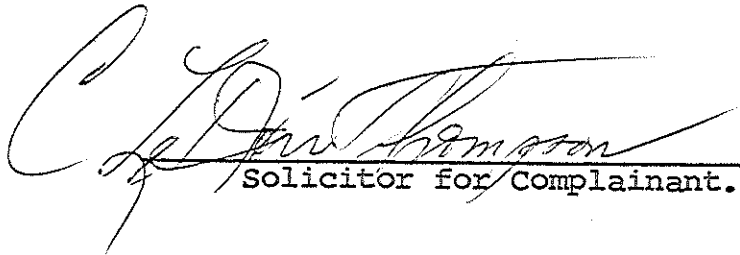
That on August 10, 1958, and on several occasions prior thereto the Respondent threatened and abused the complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the respondent was such as to give the complainant every reasonable 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.

4.

There is no property to be divided.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper procedure make the said Cobie McGhee, 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; 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 Complainant.

4532

MATTIE LOU MCGHEE

COMPLAINANT

VS

COBIE MCGHEE

RESPONDENT

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED
MAR 18 1959
ALICE J. DUCK, Register

MATTIE LOU MCGHEE
COMPLAINANT
VS
COBIE MCGHEE
RESPONDENT

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

Now comes the Respondent and accepted service of the summons and complaint in this cause.

The Respondent admits the allegations as the ages, marriage and residence, but denies all other allegations contained in the bill of complaint, 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-examine complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Cobie McGhee

STATE OF ALABAMA
ESCAMBIA COUNTY

I, J. M. Mayo, a Notary Public, in and for said County, in said State, hereby certify that Cobie McGhee, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

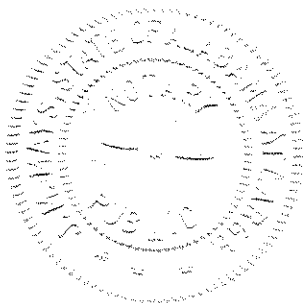
Given under my hand and seal on this the 11 day of March, 1959.

J. M. Mayo

Notary Public, Escambia County, Alabama.

atmo, Ala.

My Commission Expires April 3, 1962



4532

MATTIE LOU MCGHEE
COMPLAINANT

VS

COBIE MCGHEE
RESPONDENT

* * * * *

Answer and Waiver

* * * * *

FILED

MAR 18 1959

ALICE J. DUCK, Register

