

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

VERA DEHL HAMILTON

, Complainant

vs.

JOHN H. HAMILTON

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro 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 VERA DEHL HAMILTON is forever divorced from the said JOHN H. HAMILTON for and on account of

CRUELTY. It is further ORDERED, ADJUDGED AND DECREED that the Complainant shall have care, custody and control of the minor child Marion Gail Hamilton; that Complainant shall have all personal and real property owned by the parties; and, Respondent shall pay to Complainant \$30.00 per week as and for support and maintenance of said minor child. The stipulated agreement entered into by and between the parties, and made a part hereof, is hereby confirmed.

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 John H. Hamilton the Respondent pay the cost herein to be taxed, for which executed may issue.

This 19th day of July 1956

[Signature] 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. 3426 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

VERA DEHL HAMILTON

Complainant

vs.

JOHN H. HAMILTON

Respondent

**DIVORCE DECREE**

**FILED**

JUL 20 1956

ALICE J. DUCK, Register

VERA DEHL HAMILTON, : : IN THE CIRCUIT COURT OF  
 Complainant : : BALDWIN COUNTY, ALABAMA  
 vs. : : IN EQUITY  
 JOHN H. HAMILTON, : :  
 Respondent : :

ANSWER AND WAIVER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof separately and severally says:

1. Respondent admits the allegations of the first paragraph of the Bill of Complaint.

2. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and date of separation but denies all other allegations of this paragraph and demands strict proof of the same.

3. Respondent admits the allegations of the third paragraph of the Bill of Complaint.

Respondent hereby accepts service of a copy of the Summons and Bill of Complaint in this cause and waives further service of the same. The Respondent also waives notice of taking of testimony in this cause and notice of submission of said cause and agrees that the testimony may be taken and the cause submitted without further notice to him.

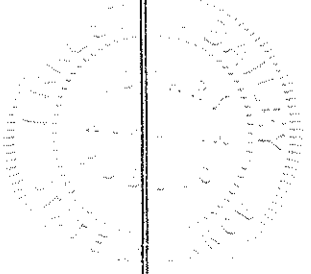
*John H. Hamilton*  
 John H. Hamilton  
 Respondent

WITNESSED BY:

*Mrs. D. Cobb*

Sworn to and subscribed to before me this the 30th day of June, 1956.

*W. M. [Signature]*  
 Notary Public, State of Alabama  
 at Large



3826

ANSWER AND WAIVER

VERA DEHL HAMILTON,

Complainant

vs.

JOHN H. HAMILTON

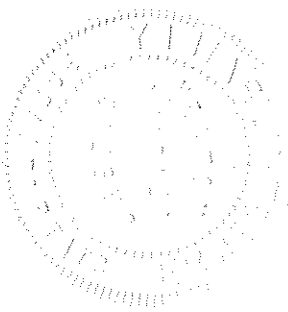
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED

JUL 13 1956

ALICE J. DUCK, Register



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VERA DEHL HAMILTON, : IN THE CIRCUIT COURT OF  
 Complainant :  
 vs. : BALDWIN COUNTY, ALABAMA  
 JOHN H. HAMILTON, : IN EQUITY  
 Respondent :

S T I P U L A T I O N

It is hereby stipulated and agreed by and between the parties hereto as follows:

1. That the Complainant shall have the full care, custody and control of their minor child, Marian Gail Hamilton, and the Respondent shall have the right to visit such child at reasonable and proper times.
2. It is further stipulated and agreed between the parties that the Complainant shall have all personal and real property owned by the parties except those items of personal nature to the Respondent.
3. It is further stipulated and agreed between the parties that the Respondent shall pay to the Complainant as and for support of the said minor child a sum in the amount of \$30.00 per week, with the first payment to become due and payable on July 7, 1956.

Dated this the 30th day of June, 1956.

Vera Dehl Hamilton  
 Vera Dehl Hamilton

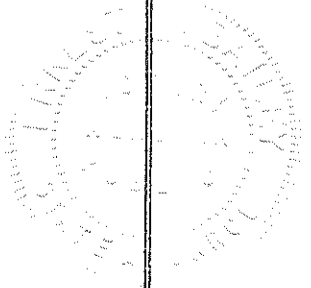
John H. Hamilton  
 John H. Hamilton

WITNESSED BY:

Mae D. Cobb

Sworn to and subscribed before me this 30th day of June, 1956.

Leah M. Baile  
 Notary Public, State of Alabama  
 at Large



3826

VERA DEHL HAMILTON,  
Complainant

vs.

JOHN H. HAMILTON,  
Respondent

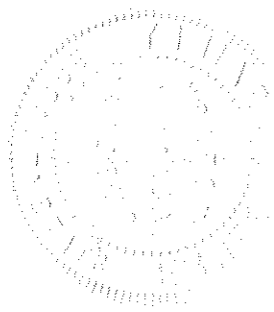
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

STIPULATED AGREEMENT

FILED

JUL 16 1956

ALICE J. DUCK, Registrar



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STATE OF ALABAMA )  
BALDWIN COUNTY )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon John H. Hamilton 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 Vera Dehl Hamilton as Complainant against John H. Hamilton, as Respondent.

Witness my hand this the 18 day of July, 1956.

*Augustus W. Wick*  
Register

VERA DEHL HAMILTON,	:	:	IN THE CIRCUIT COURT OF
Complainant	:	:	BALDWIN COUNTY, ALABAMA
vs.	:	:	IN EQUITY
JOHN H. HAMILTON,	:	:	
Respondent	:	:	

Comes your Complainant, Vera Dehl Hamilton, and files this her Bill of Complaint for divorce against John H. Hamilton, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the ages of twenty-one years and are bona fide residents of Baldwin County, Alabama, residing in Fairhope, Alabama.

SECOND:

That your Complainant and the Respondent were married on, to-wit, December 19, 1935 in Mobile, Alabama and lived together as man and wife until, on, to-wit, May 28, 1956, when, on account of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that on May 28, 1956 and at

times prior to that the Complainant states that the Respondent from his manner and conduct towards her gave reasonable apprehension of committing violence on her person and from his manner and conduct towards her she is reasonable certain that he will commit such violence upon her person, attended with danger to her life and health.

THIRD:

The Complainant and Respondent have the following named minor child: Marion Gail Hamilton, aged nine years, That your Complainant is a fit and proper person to have the care, custody and control of said child. That your Complainant has no money or property with which to properly support and educate such child and that the Respondent is able to pay your Complainant such sufficient amounts to properly support and educate such child.

PRAYER FOR PROCESS AND RELIEF:

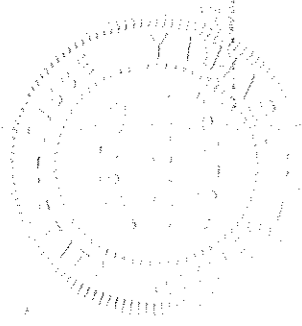
The premises considered, your Complainant prays that the above named John H. Hamilton be made a party Defendant to this cause by the usual writ or process, requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Honor will award your Complainant custody and control of her minor child herein named and will order and decree that the Respondent shall pay to your Complainant a reasonable sum as and for the support of said child. That Your Honor will also grant unto the Complainant an absolute divorce from said Respondent and will decree that the parties be allowed to re-marry if they see fit and that the Respondent is not to harass your Complainant in any way or means. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

Nera Dahl Hamilton  
Complainant

Sworn to and subscribed before  
me this 30th day of June, 1956.

Samuel H. Baker  
Notary Public, State of Alabama at Large





FILED  
CLERK OF COURT  
BALDWIN COUNTY, ALABAMA  
MAY 10 1934

*[Handwritten signature]*

VERA DEHL HAMILTON, Plaintiff  
vs.  
JOHN H. HAMILTON, Respondent

**BILL OF COMPLAINT**  
**VERA DEHL HAMILTON,**  
**Complainant**  
**vs.**  
**JOHN H. HAMILTON,**  
**Respondent**  
**IN THE CIRCUIT COURT OF**  
**BALDWIN COUNTY, ALABAMA**  
**IN EQUITY**

That the complainant, VERA DEHL HAMILTON, is the wife and legal co-owner of the respondent, JOHN H. HAMILTON, and that they are both citizens of the State of Alabama and residents of Baldwin County, Alabama. That the respondent, JOHN H. HAMILTON, has been guilty of gross and wanton neglect of his duties as a husband and father, and has been guilty of gross and wanton neglect of his duties as a citizen of the State of Alabama. That the complainant, VERA DEHL HAMILTON, has been injured in her person, property, and reputation by the respondent, JOHN H. HAMILTON, and that she is entitled to damages for the same. That the respondent, JOHN H. HAMILTON, has been guilty of gross and wanton neglect of his duties as a husband and father, and has been guilty of gross and wanton neglect of his duties as a citizen of the State of Alabama. That the complainant, VERA DEHL HAMILTON, has been injured in her person, property, and reputation by the respondent, JOHN H. HAMILTON, and that she is entitled to damages for the same.

That the complainant, VERA DEHL HAMILTON, has been injured in her person, property, and reputation by the respondent, JOHN H. HAMILTON, and that she is entitled to damages for the same. That the respondent, JOHN H. HAMILTON, has been guilty of gross and wanton neglect of his duties as a husband and father, and has been guilty of gross and wanton neglect of his duties as a citizen of the State of Alabama. That the complainant, VERA DEHL HAMILTON, has been injured in her person, property, and reputation by the respondent, JOHN H. HAMILTON, and that she is entitled to damages for the same.

*[Handwritten signature]*

VERA DEHL HAMILTON  
Complainant

vs.

JOHN H. HAMILTON  
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, \_\_\_\_\_  
and Oral Testimony \_\_\_\_\_

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

*to  
Circuit Court of Baldwin  
County  
Attorney for Complainant*

*Alice J. Duck*  
Register.

No. 28726.....

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

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

VERA DEHL HAMILTON

vs.

JOHN H. HAMILTON

**NOTE OF TESTIMONY**

Filed in Open Court this .....  
day of **FILED**, 194

**JUL 18 1956**

Register.

Printed by the Baldwin Times

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

VERA DEHL HAMILTON Complainant

VS.

JOHN H. HAMILTON Respondent

I, Melda D. Cobb

as ~~Register and~~ Commissioner

have called and caused to come before me Vera Dehl Hamilton

witness named in the Requirement for Oral Examination, on the 30 day of June

1956, at the office of Ernest M. Bailey, Attorney at Law

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

truth, the whole truth, and nothing but the truth, the said Vera Dehl Hamilton

doth depose and say as follows:

STATEMENT OF VERA DEHL HAMILTON:

My name is Vera Dehl Hamilton and the Respondent in this cause of which I am the Complainant is John H. Hamilton. We are both over the ages of twenty-one years and are bona fide residents of Baldwin County, Alabama.

On December 19, 1935 we were married in Mobile, Alabama and lived together as man and wife until May 28, 1956.

On May 28, 1956 the Respondent cursed, abused and did threaten to do violence upon my person. The Respondent has on other occasions abused and threatened to do violence to me. I am of the opinion that if we continue to live together the Respondent will commit actual violence on my person, attended with danger to my health and life.

*Vera Dehl Hamilton*  
Vera Dehl Hamilton

ORAL EXAMINATION

I, Melda D. Cobb, 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 Ernest M. Bailey, Attorney at Law

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness... or had proom 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 29th day of June, 1956.

Melda D. Cobb (L. S.)

No. 38926

Page

The State of Alabama

Baldwin County.

In Circuit Court, In Equity

VERA DEHL HAMILTON

vs.

JOHN H. HAMILTON

Complainant

Respondent

Oral Deposition

Filed

FILED

, 19

Register

18 1956

Recorded in

Record

Vol.

Page

Register

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Melda D. Cobb  
Fairhope, Alabama

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Vera Dehl Hamilton

as witnesses in behalf of Vera Dehl Hamilton in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Vera Dehl Hamilton

\_\_\_\_\_, Complainant  
and John H. Hamilton

\_\_\_\_\_, Respondent

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

Witness 29<sup>th</sup> day of July, 1952

Audie J. Shuck  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No. 3876

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Vera Dehl Hamilton

Complainant

VS.

John H. Hamilton

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Melda D. Cobb

WITNESSES:

Vera Dehl Hamilton

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ERNEST M. BAILEY

ATTORNEY AT LAW  
221 FAIRHOPE AVE.  
TELEPHONE WAVERLY 8-9759  
FAIRHOPE, ALABAMA

July  
17th  
1956

Clerk, Circuit Court  
Baldwin County  
Bay Minette, Alabama

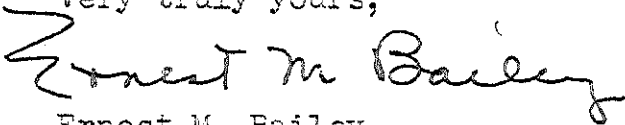
In re: Hamilton vs. Hamilton

Dear Mrs. Duck:

I am attaching herewith necessary papers in the above divorce suit. I would very much appreciate your referring this to Judge Hall for his attention.

I am leaving this day for hospitalization in Pensacola. I expect to be confined for approximately two weeks. I will be grateful for your assistance in this matter.

Very truly yours,



Ernest M. Bailey

EMB:b

Enclosures