

3850

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons BOBBY WILLIAMS, 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 EMMA LOU DYESS WILLIAMS as Complainant and against BOBBY WILLIAMS, as Respondent.

WITNESS my hand this the 14<sup>th</sup> day of Aug, 1956.

Alice J. Duck  
Register.

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EMMA LOU DYESS WILLIAMS	IN THE CIRCUIT COURT OF
COMPLAINANT	BALDWIN COUNTY, ALABAMA
VS	IN EQUITY.
BOBBY WILLIAMS	
RESPONDENT	

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

Your Complainant, EMMA LOU DYESS WILLIAMS, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 18 and a resident of Baldwin County, Alabama, and has been more than two years next preceeding; The Respondent is over the age of 21 and is presently a non-resident of the State of Alabama residing at 60630 Van Dyke, c/o Mr. Kenworthy, Washington, Michigan.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi on September 25, 1953 and lived together as husband and wife in Baldwin County, Alabama until June 16, 1954.

3.

That on June 16, 1954, while your Complainant and the Respondent were living together as husband and wife, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

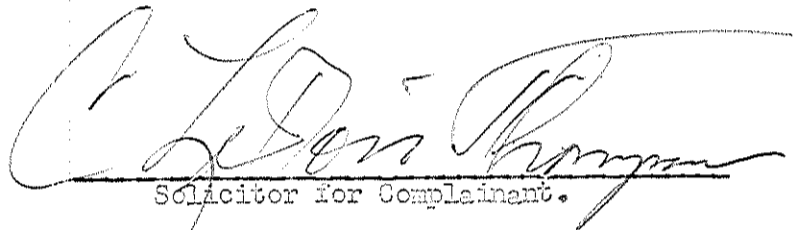
4.

There are no children as fruits of this marriage, and there is no

property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process make the said Bobby Williams, 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 your Honor will upon a final hearing hereof, award to her a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent.

Complainant prays for such other, further, different or general relief as she may be entitled in the premises, etc.

  
Solicitor for Complainant.

EMMA LOU DYESS WILLIAMS, 38570

COMPLAINANT

VS

BOBBY WILLIAMS,

RESPONDENT

BILL OF COMPLAINT

*Reg Mail*

C. LeNoir Thompson  
Attorney At Law  
Bay Minette, Alabama

**FILED**

AUG 14 1956

ALICE J. DUCK, Register

*[Handwritten signature]*

*[Handwritten mark]*

8600 Motion for Decree Pro Confesso After Service by Registered Mail.

The State of Alabama,  
Baldwin County.

No. .... CIRCUIT COURT, IN EQUITY.

EMMA LOU DYESS WILLIAMS

Complainant

Vs.

BOBBY WILLIAMS

Defendant

Motion is hereby made for a Decree Pro Confesso against BOBBY WILLIAMS

..... 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 by Registered Mail, 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 17<sup>th</sup> day of Oct, 1956

..... Alice J. Duck, Solicitor.

No. ....

Page .....

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

**CIRCUIT COURT, IN EQUITY**

EMMA LOU DYESS WILLIAMS

**Vs.**

BOBBY WILLIAMS

**MOTION FOR DECREE PRO CONFESSO**  
**AFTER NOTICE BY REGISTERED MAIL**

Filed ....., 19.....

Register.

Recorded in ..... Record,

Vol. .... Page .....

Register.

*[Faint, illegible text from the reverse side of the page, including a date stamp: "MAY 19 1911"]*

EMMA LOU DYESS WILLIAMS

vs.

BOBBY WILLIAMS

CIRCUIT COURT OF  
Baldwin County.

IN EQUITY.

In this cause it being made to appear to the Register that on the 11th  
day of August 1956, a copy of the Bill of Complaint filed in this cause was  
sent to Bobby Williams

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom  
addressed," and return receipt demanded addressed to the Register of this Court; and that on the  
22nd day of August 1956, such receipt was duly  
received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer  
or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered,  
adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all  
things taken as confessed against the said

BOBBY WILLIAMS

Defendant.

This the 12<sup>th</sup> day of Oct 1956.

Carrie J. Duck Register.

No. \_\_\_\_\_

**CIRCUIT COURT OF BALDWIN  
COUNTY, ALA.**

**In Equity.**

EMMA LOU DYESS WILLIAMS

vs.

BOBBY WILLIAMS

**Decree Pro Confesso After  
Notice By Registered Mail.**

Filed in office this \_\_\_\_\_ day of

\_\_\_\_\_ 192\_\_\_\_\_

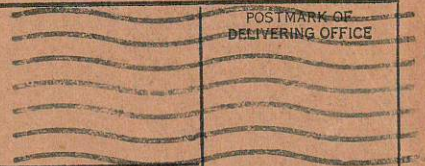
\_\_\_\_\_, Register

Entered in O. B. \_\_\_\_\_ Page \_\_\_\_\_

4444 1111 1111 1111

POST OFFICE DEPARTMENT  
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID  
PAYMENT OF POSTAGE, \$300



POSTMARK OF  
DELIVERING OFFICE

INSTRUCTIONS.—Show name, address and number of article below. Complete "Instructions To Delivering Employee" on other side, when applicable. Moisten gummed ends and securely attach to back of article. Endorse front of article RETURN RECEIPT REQUESTED.

RETURN TO  
▼

REGISTERED NO.	NAME OF SENDER <i>Alice J. Duck</i>
CERTIFIED NO. <i>593137</i>	STREET AND NO. OR P.O. BOX <i>Bay Minette</i>
INSURED NO.	CITY, ZONE AND STATE <i>Ala.</i>

POD Form 3811, Dec. 1955

c0-16-71542-2



3850

INSTRUCTIONS TO DELIVERING EMPLOYEE

- DELIVER ONLY TO ADDRESSEE (20¢ additional)
- SHOW ADDRESS WHERE DELIVERED IN ITEM 4 BELOW (31¢ additional)

RECEIPT

Received from the Postmaster the Registered, Certified, or Insured Article, the number of which appears on the face of this return receipt.

1. SIGNATURE OR NAME OF ADDRESSEE

X *Robert Williams*

2. SIGNATURE OF ADDRESSEE'S AGENT (Agent should enter addressee's name in item 1 above)

*Deliver to Addressee Only*

3. DELIVERY DATE

, 19

4.

RECEIVED  
MAY 22 1956

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 Emma Lou Dyess Williams and Mrs. O. J. Dyess

a witnesses in behalf of Emma Lou Dyess Williams in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Emma Lou Dyess Williams

and Bobby Williams, Complainant

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 23 day of Aug, 1956

Alice J. Duck Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. \_\_\_\_\_

**THE STATE OF ALABAMA  
Baldwin County**

**CIRCUIT COURT**

EMMA LOU DYESS WILLIAMS

Complainant

VS.

BOBBY WILLIAMS

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

LOIS WILSON

WITNESSES:

EMMA LOU DYESS WILLIAMS

MRS. O. J. DYESS

very business and proceedings has been very much, at this and which are not in force  
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THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama

(In Equity)

EMMA LOU DYESS WILLIAMS

Complainant

VS.

BOBBY WILLIAMS

Respondent

I, Lois Wilson

as ~~Register and~~ Commissioner

have called and caused to come before me Emma Lou Dyess Williams and Mrs. O. J. Dyess

witness<sup>es</sup> named in the Requirement for Oral Examination, on the 23 day of August 1956, at the office of C. LeNoir Thompson in Bay Minette, Alabama, and having first sworn said Witness<sup>es</sup> to speak the truth, the whole truth, and nothing but the truth, the said Emma Lou Dyess Williams and Mrs. O. J. Dyess doth depose and say as follows:

That my name is Emma Lou Dyess Williams, I am over the age of 18 and a resident of Baldwin County, Alabama, and have been more than two years next preceding; the Respondent is over the age of 19 and a non-resident of the State of Alabama, his present address being 60630 Van Dyke, c/o Mr. Kenworthy, Washington, Michigan, we were married on September 25, 1953, and lived together as husband and wife until on or about June 16, 1954, at which time the Respondent voluntarily abandoned your Complainant without fault on her part and we have not lived together as husband and wife since that day. There are no children born as fruits of this marriage and no property to be divided. Your Complainant respectfully asks this Honorable Court for a divorce and the right to resume the use of her maiden name.

Emma Lou Williams

That my name is Mrs. O. J. Dyess, I know both parties to this cause, the complainant is over the age of 18 and a resident of Baldwin County, Alabama and has been all her life, the Respondent is over the age of 19 and presently resides at 60630 Van Dyke c/o Mr. Kenworthy, Washington Michigan. The respondent's parents reside in Baldwin County, Alabama, the parties to this cause were married at Lucedale, Mississippi, on September 25, 1953 and lived together as husband and wife until on or about June 16, 1954, at which time the Respondent abandoned the Complainant without fault on her part and they have not lived together since that day as husband and wife. There are no children as fruits of this marriage and no property to be divided. I do not believe they will ever live together again as husband and wife.

Mrs O J Dyess

**ORAL EXAMINATION.**

I, Lois Wilson, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition ~~son~~ 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 Thompson

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 witness es; 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 23 day of August, 1956

Lois Wilson (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EGGA LOU DYESS WILLIAMS

vs. Complainant

ROBBY WILLIAMS

Respondent.

**Oral Deposition**

Filed FILED, 1956  
Register.

OCT 17 1956

Recorded in  
ALICE J. DYCK, Register

Record

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

EMMA LOU DYESS WILLIAMS

vs.

BOBBY WILLIAMS

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 Emma Lou Dyess Williams and Mrs O. J. Dyess, Decree Pro  
Confesso on Registered Mail and Motion for Decree Pro Confesso on  
Registered Mail.

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

*[Handwritten signature]*

*Alice J. Duck*

Register.

No. ....

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

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

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EMMA LOU DYESS WILLIAMS

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vs.

BOBBY WILLIAMS

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**NOTE OF TESTIMONY**

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

**FILED**  
**OCT. 17 1956**  
ANNIE J. DUCK, Clerk

Register.

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

EMMA LOU DYESS WILLIAMS

Complainant

vs.

BOBBY WILLIAMS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Registered Mail 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 Emma Lou Dyess Williams is forever divorced from the said Bobby Williams for and on account of Abandonment.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the Complainant, Emma Lou Dyess Williams, shall resume the use of her maiden name, Emma Lou Dyess.

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 Emma Lou Dyess Williams the Complainant pay the cost herein to be taxed, for which executed may issue.

This 17th day of October 1956

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

ELMA LOU DYESS WILLIAMS

Complainant

vs.

BOBBY WILLIAMS

Respondent

**DIVORCE DECREE**

FILED

OCT 17 1956

ALICE J. BOCK, Registrar

3850