## The State of Alabama, Baldwin County

#### CIRCUIT COURT, IN EQUITY

IMOGENE MORROW SANKS , Complainant
vs.
EUGENE C. SANKS , Respondent
This cause coming on to be heard was submitted upon Bill of Complaint, Deckee Rrox Confessor on Answer and Waiver
sideration 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
IMOGENE MORROW SANKS
said_EUGENE C. SANKS for and on account of
"CRUELTY"
IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the complainan
be, and she is hereby, authorized and empowered to resume using
the name, IMOGENE MORROW.
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
Thisday of October19_50•
Jubert M. Hell  Judge Circuit Court, In Equity.
I,
of, 19
Register of Circuit Court, In Equity.

THE STATE OF ALABAMA BALDWIN COUNTY In Circuit Court, In Equity Complainant vs. Respondent DIVORCE DECREE

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## THE STATE OF ALABAMA, BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama (In Equity)

IMOGENE MORROW SA	ANKS	COMPLAINANT	and the second
	vs.	we start the	en en kombonister En en kombonister
iz with a light EUGENE C. SANKS		RESPONDENT	
I, JAMES RAY OWEN			
as Register and Commissioner			
have called and caused to come before me_		E MORROW SANKS	
	<u> </u>		
**************************************	· ·		
in Bay Minette , Alabama, a truth, the whole truth, and nothing but the tr	and having fi	rst sworn said witness_	to speak the
is Imogene Morrow Sanks. I am tham over the age of twenty-one yet County, Alabama, residing at Bay Eugene C. Sanks is over the age dent of Baldwin County, Alabama. C. Sanks at Leakesville, Mississ Eugene has a high temper and soo play his temper. He would get may fly off the handle and curse and became worse and worse and on, 1955, he hit me so hard in my mote that I left him at that time as his wife. I am afraid that if as his wife he would beat me aga	ne complained ars. I among the complained arrived and with me complained are about, and have recorded are about.	n a resident of Alabama. The respondent the tenth of Septon and abuse meand abuse meand abuse the 25th day of the knocked out not returned to be return to live	use and I Baldwin espondent, is a resi- t, Eugene ember, 1954. gan to dis- and would He gradually November, one of my live with with him

Inoque Morrow Lanks

J. James R. Owen			as Regis	ter and	t Commi	ssioner	hereby c	ertify
that the foregoing deposition on Oral	Exam	ination	was take	en dowi	in writi	ng by m	e in the	words
of the witness and read over to	her	an	d <u>she</u>	sign	ed the sa	ıme in t	he prese	nce o
myself and <u>Telfair J. Mashl</u>	ourn	<u>.Jr</u>			<del></del>			
at the time and place herein mentioned;	that :	I have	personal	kņowle	edge of pe	ersonal i	identity c	of said
witnessor had proof made before m	ne of 1	the ide	entity of	said w	ritness	: that	t I am r	ot o
counsel or of kin to any of the parties to							1.	
I enclose the said Oral Examin						7.5		
					_			
Given under my hand and seal,	tnis_	<u>, , , , , , , , , , , , , , , , , , , </u>	day of		<u> </u>		, 19 <u>70</u>	i dadi il
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IMOGENE MORROW SANKS		
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vs.		Baldwin County
EUCENE C. SANKS		
		IN EQUITY
		Circuit Court of Baldwin Count
and in behalf of Defendant uponAnsw	er and	l Waiver
foir K. Madlebury, A.	:	anish rench
O - O		Register.

No. 3899	
THE STATE OF ALABAMA Baldwin County	Section 1
IN EQUITY Circuit Court of Baldwin Cou	nty
vs.	demande seederstande in 'e e e e e e e e e e e e e e e e e e e
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IMOGENI	E M	ORROW		
			(	Complainant
		VS	5.	
EUGENE	C.	SANKS	5	
				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	s reside within one hundred miles from
Bay Minette , in the County of	f Baldwin
Alabama, the place of trial of said cause, to-w	it: IMOGENE MORROW SANKS
•	
•	vog √f
2. That said Complainant requires an or	ral examination of said witnesses before a Commissioner
appointed by the Register of this Court.	
garanteen gemannen, meen, meen ja	Solicitor for Complainant
NOTE:	
Complainant suggests the name ofJ	ames Ray Owen
Complainant suggests the name of	
	ames Ray Owen
	mmissioner upon the examination of said witnesses.
	mmissioner upon the examination of said witnesses.
	mmissioner upon the examination of said witnesses.  Solicitor for Complainant.
	mmissioner upon the examination of said witnesses.  Solicitor for Complainant.
as a suitable and competent person to act as con	mmissioner upon the examination of said witnesses.  Solicitor for Complainant.
as a suitable and competent person to act as con	mmissioner upon the examination of said witnesses.  Solicitor for Complainant.
as a suitable and competent person to act as con	mmissioner upon the examination of said witnesses.  Solicitor for Complainant.
as a suitable and competent person to act as con	mmissioner upon the examination of said witnesses.  Solicitor for Complainant.

#### DEMAND FOR ORAL EXAMINATION

IMOGENE MORROW SANKS

Complainant

VS.

EUGENE C. SANKS

Respondent

## IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this....day of

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Moore Printing Co.

# THE STATE OF ALABAMA Baldwin County

#### Circuit Court

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	these presents do authorize			
call before you ar	Titoonie	ORROW SANKS		as you may appo
can before you an	id examine	Oligion Ollivia		
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witnesses in behalt	f of IMOGENE MORROW	SANKS	<u>.</u>	7.
	V			use pending in
rcuit Court in Bal	dwin County, of said State,	whereinIM	OGENE MOR	ROW SANKS
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oath, to be by you take and certify the	is the  administered, upon he deposition of the witness.	ər		Responden
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	Defer	ıdant	· · · · · · · · · · · · · · · · · · ·
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WITNESSES:			
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IMOGENE MORROW SANKS,

Complainant,

VS.

EUGENE C. SANKS,

Respondent.

IN	THE	CIRCU	JIT (	COT	ЛТ	OF
BAI	LDWIN	I COUN	TY,	Al	LAB	AMA.
IN	EQU]	TTY.	N	٥.		

TO THE HONORABLE HUBERT M. HALL, JUDGE OF SAID COURT:

Your Complainant, IMOGENE MORROW SANKS, respectfully represents and shows unto your Honor as follows:

- l. That your complainant is over the age of twenty-one years and is a bona fide resident citizen of said State and County; that Eugene C. Sanks is over the age of twenty-one years and resides in said County and State.
- 2. That your complainant and the respondent were lawfully married on or about, to-wit: the 4th day of September, 1954, at Leakesville, Mississippi.
- 3. That the said respondent on or about, to-wit: the 25th day of November, 1955, did assault, strike, beat and hit complainant; that he knocked out one of her teeth; that respondent has committed actual violence on her person attended with danger to her life or health; and that she left him at that time and has not since that time returned to live with him as his wife, because she is reasonably convinced that should she do so, he would do further violence to her person which would necessarily endanger her life or health.

EUGENE C. SANKS a party respondent to this bill of complaint, and in order that she may have the relief hereinafter prayed, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said Eugenen C. Sanks, commanding him to plead, answer or demur to this Bill of Complaint within the time required by law; and that on a final hearing of this cause your Honor will enter a decree divorcing your complainant from said respondent, and permitting your complainant to resume the use of her former name, IMOGENE MCRROW; and that your Honor will grant such other, further, and different relief as unto your Honor may seem just and proper, and, as in duty bound, your complainant will ever pray, etc.



IMOGENE MORROW SANKS,

Complainant,

VS.

EUGENE C. SANKS,

Respondent.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

#### ANSWER AND WAIVER

Comes the respondent in the above styled cause, EUGENE C. SANKS, and accepts service of the bill of complaint in said cause; waives notice of the filing of interrogatories in said 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 at any time.

And for answer to the bill of complaint in said cause, respondent says:

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

Executed in the presence of:

Fay Stewart

Engue C. Sans

### The State of Alabama, Baldwin County

#### CIRCUIT COURT, IN EQUITY

AUBREY WILSON	, Complainant
	vs.
DOMNITE THOUSE IN	TI SON
	ILSON Respondent
This cause coming on to be heard wa	s submitted upon Bill of Complaint, Decree Proxicantesso an
Answer and Waiver	and Testimony as noted by the Register, and upon con-
sideration thereof, the Court is of the opinion	that the Complainant is entitled to the relief prayed for in
said bill.	and the second of the second o
	decreed by the Court that the bonds of matrimony heretofore ant be, and the same are hereby dissolved, and that the said
Aubrey Wilson	is forever divorced from the
said Donnie Thomas Wilson	for and on account of
IT IS FURTHER CRDERED, AD	JUDGED AND DECREED that the Respondent,
Donnie Thomas Wilson, shall re	sume the use of her maiden name. Donnie
Thomas.	
	The state of the s
to each other until sixty days after the rendit days, neither party shall again marry except.  It is further ordered that the Completagain contract marriage upon payment of the  It is further ordered thatAubrey	decreed that neither party to this suit shall again marry except ion of this decree, and that if appeal is taken within sixty to each other during the pendency of said appeal.  Administration and Respondent be, and they are hereby permitted to cost of this suit.  Wilson  Pay the cost herein to be taxed, for which executed may issue.  I follow Mall  Judge Circuit Court, In Equity.
Cou fore Judg decr	rt of Baldwin County, Alabama, do hereby certify that the going is a correct copy of the original decree, rendered by the ge of the Circuit Court in the above stated cause, which said see is on file and enrolled in my office.  Witness my hand and seal this theday

Page

THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

AUBREY WILSON

Complainant

vs.

DONNIE THOMAS WILSON

Respondent

### DIVORCE DECREE

FILED
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ALICE J. DUCK, Register

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AUBREY WILSON	1 A
	THE STATE OF ALABAMA
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	Baldwin County
vs.	
DONNIE THOMAS WILSON	
	IN EQUITY
	Circuit Court of Baldwin Count
	•
This cause is submitted in behalf of Complain	t upon the original Bill of Complaint
<del>-</del>	· · · · · · · · · · · · · · · · · ·
Testimony of Aubrey Wilson and Mrs.	Louise West.
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d in behalf of Defendant upon Answer and Wa	liver.
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	alie J. Duck

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THE STATE OF ALABAMA Baldwin County	
IN EQUITY Circuit Court of Baldwin County	
AUEREX WILSON	
vs.	
DONNIE THOLAS WELSON	
NOTE OF TESTIMONY	
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# THE STATE OF ALABAMA Baldwin County

#### Circuit Court

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to call be	fore you and exa	mine <u>Aubrey Wilso</u>	n and Mrs	• Lou	ise We	st.		
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a witness	es in behalf of	Aubrey Wilson	w		in	a caus	e pend	ing in o
Circuit C	ourt in Baldwin (	County, of said State,						•
		Aubrey Wilson						
	**************************************					· · · · · · · · · · · · · · · · · · ·		
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nd	Donnie Thomas	Wilson						
			-				Res	pondent_
n oath, to	be by you admir	nistered, upon						
o take and	l certify the deposi	tion of the witness_	and retu	n the	same to	our Co	ourt, wi	th all con
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DONNIE THOMAS WILSON		:
	Defend	ant
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WITNESSES:		
MS. LOUISE WEST		

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AUBFRY WILSON,

COMPLAINANT

VS.

DONNIE THOMAS WILSON,

RESPONDENT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY

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

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demands strict proff 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.

I request that I be permitted to resuem the use of maiden name Donnie Thomas.

STATE OF Louisiana Parish XXXXX OF Winn

I, James L. Womack, A Notary Public, in and for said 6ounty, in said State, hereby certify that Donnie Thomas Wilson, 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 she executed the same voluntarily of the day the same bears date.

Given order my hand and seal on this the 17 day of September, 1956,

Parish

AUBREY WILSON

COMPLAINANT

VS

DONNIE THOMAS WILSON

RESPONDENT

ANSWER AND WAIVER

\*\*\*\*\*\*\*\*\*\*

00T 18 1956

MAKE A DUCK Register

From the law offices of C. LeNoir Thompson

Attorney-At-Law Bay Minette, Alahama STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons DONNIE THOMAS WILSON, 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 AUBREY WILSON, as Complainant and against DONNIE THOMAS WILSON, as Respondent.

WITNESS my hand this the 18 day of Oct , 1956.

alice J. Duck

\*\*\*\*\*\*\*\*\*\*

AUBREY WILSON

COMPLAINANT

VS.

DONNIE THOMAS WILSON

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

CASE NO. 3900

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

Your Complainant, Aubrey Wilson, 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 Baldwin County, Alabama and has been more than two years next preceding; The Respondent is over the age of 18 and a resident of Baldwin County, Alabama and has been more than two years next preceding.

2.

That your Complainant and the Respondent married in Lucedale, Mississippi, on May 5, 1956, and lived together as husband and wife in Baldwin County, Alabama until on to-wit August 14, 1956.

3.

Your Complainant further avers and alleges that said Respondent has been guilty of adultery with divers parties and persons whose names to your Complainant are unknown.

4.

There are no children as fruits of this marriage and no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process make the said Donnie Thomas Wilson, party Respondent to this bill of Complaint, requiring her 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 him a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent; Complainant further prays for such other, further, different or general relief as he may be entitled in the premises, etc.

Splicator for Complainant

AUEREY WILSON

COMPLAINANT

VS

DONNIE THOMAS WILSON

RESPONDENT

SUMMONS AND COMPLAINT

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

#### THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

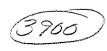
···	Complainant	
ing tinak njili	VS.	Complaniant
I, Lois Wilson	Donnie Thomas Wilson	Respondent
as Register and Commissi have called and caused to	oner	and Mrs. Louise West
in Bay M inette truth, the whole truth, and	Requirement for Oral Examination  C. LeNoir Thomoson  ——————————————————————————————————	worn said Witness es to speak the abrey Wilson and lims. Louise

That my name is Aubrey Wilson. I am over the age of 21 years and a resident of Baldwin County, Alabama and have been more than two years next preceding. The respondent is over the age of 20 years and is presently residing in Louisiana. We were married on May 5, 1956 and lived together for eight days, when the respondent abandoned me without fault on my part and disappeared. I found her on or about the first of August, and on August 6th we again began living together as husband and wife. On August lith, she again left me and went over where she is now with another man, whose name is unknown to me, but I am convinced is not her father or brother. Before she left the last time, I know that she was seeing some else, but I could only glimpse him, and when I demanded the facts and his identity, she packed up and went off with him. We have no children as fruits of our marriage and she was not pregnant when she left, and I want my divorce before anything happens now. I have not lived with her as husband and wife since August 14. I know that we will hever live together again as husband and wife after she went off this last time. She wants her maiden name back, and I want her to have it. We have no property to be divided.

alignilian.

That my name is Mrs. Louise West, I know both parties to this cause. The Complainant, Aubrey Wilson, is over the age of 21 and is a resident of Baldwin County, Alabama and has been such more than two years next preceding. The Respondent is over the age of 18 and has gone back to Louisiana where I understand she presently lives. They were married on May 5, 1956 at disappeared and was not heard from until some time in August. They began a little over a week later the Respondent left again with a man whose name to me is unknown. From what I have learned in this matter the Respondent any property which these parties have had that might be divided nor have of her last departure. I do not believe the parties will ever live together again as husband and wife.

Mrs. Louise Des



I, <u>lois Wilson</u>	, as Register and Commissioner hereby certify that
the foregoing deposition S on Oral Examination	n 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 Thomoson at the time and place herein mentioned; that	have personal knowledge of personal identity of
said witness es or had proom made before me	e of the identity of said witness SS; that I am not of
counsel or kin to any of the parties to said caus	e, or any manner interested in the result thereof
I enclose the said Oral Examination in an env	velope to the Register of said Court.
Given under my hand and seal, this 20th de	y of September , 1956
on a Merchania (1986) (	Jois Wilson (L. S.)

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	Filed	Oral Deposition	Respondent.	Ī	vs. Complainant	VOST	- 11	IN CIRCUIT COURT, IN EQUITY	THE STATE OF ALABAMA BALDWIN COUNTY	