

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

MARY KATHERINE COX COMPLAINANT

vs.

GREAL BRYCE COX RESPONDENT

I, Melda D. Cobb

as ~~Register~~ and Commissioner

have called and caused to come before me Mary Katherine Cox

witness _____ named in the requirement for Oral Examination, on the 19th day of October
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 Mary Katherine Cox

doth depose and say as follows:

STATEMENT OF MARY KATHERINE COX:

My name is Mary Katherine Cox and the Respondent's name is Greal Bryce Cox. We are both over the age of twenty-one years and are bona fide residents of Baldwin County, Alabama.

On October 15, 1949 the Respondent and I were married in Lucedale, Mississippi and lived together as man and wife until September 15, 1956.

On that date 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 on my person actual bodily violence or will injure me permanently.

Mary Katherine Cox
Complainant

I, Melda D. Cobb 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 _____ and read over to her and she signed the same in the presence of myself and Ernest M. Bailey at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proof 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 19 day of October, 1956

Melda D Cobb (L. S.)

No. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

MARY KATHERINE COX

COMPLAINANT

GREAL BRYCE COX

vs.

RESPONDENT

ORAL DEPOSITION

Filed _____ 19____

Register.

RECORDED IN

Record

Vol. _____ Page _____

Register.

3902

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARY KATHERINE COX, Complainant

vs.

GREAL BRYCE COX, 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 Mary Katherine Cox is forever divorced from the said Greal Bryce Cox 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 Mary Katherine Cox the Complainant pay the cost herein to be taxed, for which executed may issue.

This 19 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. 3907 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

MARY KATHERINE COX

Complainant

vs.

GREAL BRYCE COX

Respondent

DIVORCE DECREE

FILED

OCT 19 1956

ALICE J. DUCK, Register

MARY KATHERINE COX

vs.

GREAL BRYCE COX

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, _____
Answer and Waiver and Oral Testimony

and in behalf of Defendant upon Answer and Waiver

G. James McArthur
Substantia for Complainant

Alvise J. Church
Register.

No. 3907

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

MARY KATHERINE COX

vs.

GREAL BRYCE COX

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

FILED

OCT 19 1956

Register.

Printed by Abb Baldwin Co Register

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Melba D. Cobb

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 Mary Katherine Cox

a witnesses in behalf of Mary Katherine Cox in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Mary Katherine Cox

and Greal Bryce Cox, Complainant

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

Witness 19th day of October, 1956

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3902

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MARY KATHERINE COX

Complainant

VS.

GREAL BRYCE COX

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

MELDA D. COBB

WITNESSES:

MARY KATHERINE COX

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MARY KATHERINE COX,
Complainant

vs.

GREAL BRYCE COX,
Respondent

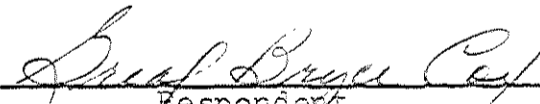
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ANSWER AND WAIVER

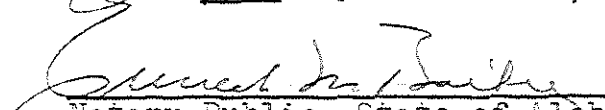
Comes Greal Bryce Cox, the Respondent in the above styled cause, and for answer to the Bill of Complaint filed in this cause, says:

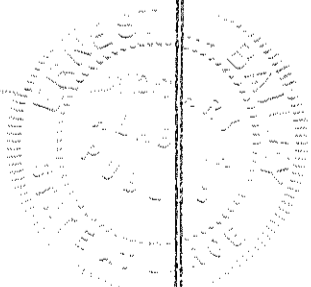
1. That he admits the allegations of FIRST Paragraph in the Bill of Complaint.
2. That he admits the allegations of SECOND Paragraph in the Bill of Complaint as to the date of marriage and the date of separation but that he denies all the other allegations of said Paragraph and demands strict proof thereof.
3. That he admits the allegations of THIRD Paragraph of the Bill of Complaint.

The Respondent hereby waives notice of the taking of testimony in said 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.


Respondent

Sworn to and subscribed before me this 19th day of October, 1956.


Notary Public, State of Alabama
at Large



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 Greal Bryce Cox to appear and plead, answer or demur, within thirty days from the service hereof, to a Bill of Complaint filed in the Circuit Court of Baldwin County, in Equity, by Mary Katherine Cox, as Complainant, against Greal Bryce Cox, as Respondent.

Witness my hand this the _____ day of October, 1956.

Register

MARY KATHERINE COX,
Complainant

§
§

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

vs.

IN EQUITY

GREAL BRYCE COX,
Respondent

§
§

Comes your Complainant, Mary Katherine Cox, and files this her Bill of Complaint for divorce against Greal Bryce Cox, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years, and that both are resident citizens of Baldwin County, Alabama, residing in Fairhope.

SECOND:

That the Complainant and the Respondent were married on, to-wit, the 15th day of October, 1949 in Lucedale, Mississippi and lived together as man and wife until on, to-wit, the 15th day of September, 1956, when on account of matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that on the

15th day of September, 1956 and at times prior thereto your 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 reasonably certain that if she continues to live with the Respondent he will commit such violence on her person attended with danger to her life and health.

THIRD:

That the Complainant and the Respondent have no children of this marriage and have heretofore entered into an agreement disposing of their real or personal property among themselves.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above Greal Bryce Cox be made a party Defendant to this cause by the usual writ or process of this Honorable Court 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 grant unto your Complainant an absolute divorce from said Respondent. That Your Honor will also decree that the Complainant be allowed to remarry if she sees fit. Your Complainant also prays that she be allowed to resume her maiden name upon a final hearing of this cause. Your Complainant prays for such other further and different relief to which she may be entitled and as in duty bound she will ever pray.

Mary Katherine Cox
Complainant

Samuel M. Bunker
Solicitor for Complainant

Mary Katherine Cox

MARY KATHERINE COX,
Complainant
vs.
GREAL BRYCE COX,
Respondent

SUMMONS AND BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

3902