

(3952)

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Charlie Clark, Complainant

vs.

Marcelete Snowden Clark, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree-Pro-Confesso or 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 Charlie Clark is forever divorced from the said Marcelete Snowden Clark for and on account of Cruelty; the Respondent shall be permitted to resume the use of her maiden name.

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 Complainant the pay the cost herein to be taxed, for which executed may issue.

This 24th day of April 1957 Hubert M. Hare Judge Circuit Court, In Equity.

I, Alice J. Duck, 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. 3952 Page -----

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Charlie Clark

Complainant

vs.

Marcelete Snowden Clark

Respondent

**DIVORCE DECREE**

**FILED**

APR 12<sup>5</sup> 1957

**ALICE J. BUCK, Register**

Charlie Clark

vs.

Marcelete Snowden Clark

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, and testimony by deposition

and in behalf of Defendant upon waiver and answer

James A. Ince  
Solicitor for Complainant

Alice J. Duck  
Register.

No. 3952

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

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

Charlie Clark

vs.

Marcelete Snowden Clark

**NOTE OF TESTIMONY**

Filed in Open Court this 16  
day of JAN, 1947

**FILED**  
**JAN 16 1947**  
**ALICE I. BUCK, REGISTER.**

JAMES A. BRICE

ATTORNEY AT LAW

FOLEY, ALABAMA

April 22, 1957

Mrs. Alice J. Duck  
Register in Equity  
Baldwin County  
Bay Minette, Alabama

RE: Charlie Clark  
VS: Marcelete Snowden Clark  
Equity Case #3952

Dear Mrs. Duck:

I am returning the testimony taken by deposition in the above case. I believe you will find the court costs have been paid prior to this date, and I will appreciate your presentation of the divorce matter to Judge Hall in order that the divorce can be obtained.

Thank you for your consideration.

Sincerely,



JAMES A. BRICE

JAB:ss

encl-as noted

**JAMES A. BRICE**

**ATTORNEY AT LAW**

**FOLEY, ALABAMA**

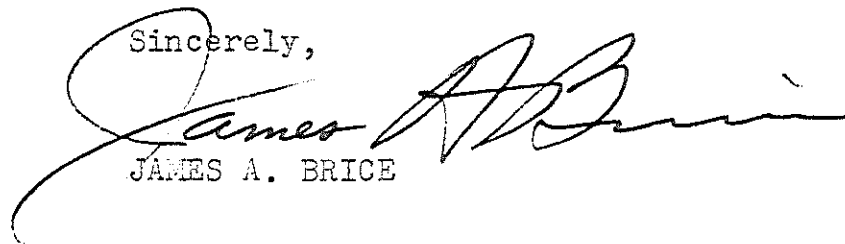
January 15, 1957

Mrs. Alice J. Duck, Register in Equity  
Circuit Court  
Bay Minette, Alabama

Dear Mrs. Duck:

I am enclosing bill of complaint, answer and waiver, depositions, costs, and note of testimony for divorce action by Charlie Clark VS. Marcelete Snowden Clark. We have no forms for commission to take deposition.

Sincerely,

A handwritten signature in cursive script that reads "James A. Brice". The signature is written in dark ink and is positioned above the typed name.

JAMES A. BRICE

JAB:ss

encl-as noted

THE STATE OF ALABAMA }  
Baldwin County }

Circuit Court of Baldwin County, Alabama,  
(In Equity)

Charlie Clark \_\_\_\_\_ COMPLAINANT

vs.

Marcelete Snowden Clark \_\_\_\_\_ RESPONDENT

I, Sarah E. Sammons \_\_\_\_\_

as Register and Commissioner \_\_\_\_\_

have called and caused to come before me Henry Atkinson \_\_\_\_\_

witness \_\_\_\_\_ named in the requirement for Oral Examination, on the 15 day of January \_\_\_\_\_

~~19~~ 57, at the office of James A. Brice \_\_\_\_\_

in Foley \_\_\_\_\_, Alabama, and having first sworn said witness \_\_\_\_\_ to speak the

truth, the whole truth, and nothing but the truth, the said Henry Atkinson \_\_\_\_\_

doth depose and say as follows:

I was with Charlie Clark on the night of November 23, 1956. He told me he thought his wife was stepping out on him with a man from Daphne. We drove around a while and came up on a car that looked like this man's. When we got out, Charlie Clark's wife, Marcelete, got out of the other car and started cursing Charlie and calling him a lot of dirty names. She had a little switch knife with her, and she popped the blade out and told Charlie and me we'd better lease fast. We left after she started at Charlie with the knife.

I am a close neighbor of Charlie and Marcelete, and have been in their home on other occasions when Marcelete would threaten Charlie, and throw things at him, and curse him, and in every way make him fearful he would get up and leave the house.

Henry Atkinson

I, Sarah E. Sammons 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 him and he signed the same in the presence of myself and James A. Brice

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 15 day of January 1917.

Sarah E. Sammons (L. S.)

No. 3959

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THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

CHARLIE CLARK

COMPLAINANT

vs.

MARCELETTE SNOWDEN CLARK

RESPONDENT

ORAL DEPOSITION

Filed F I L L E D, 1917

John A. Beck, Register.

ALICE A. BECK, Register

Record

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



THE STATE OF ALABAMA }  
Baldwin County }

Circuit Court of Baldwin County, Alabama,  
(In Equity)

Charlie Clark COMPLAINANT

vs.

Marcelete Snowden Clark RESPONDENT

I, Sarah E. Sammons

as Register and Commissioner

have called and caused to come before me Charlie Clark

witness named in the requirement for Oral Examination, on the 15 day of January

~~194~~ 57, at the office of James A. Brice

in Foley, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Charlie Clark

doth depose and say as follows:

My name is Charlie Clark. I was married to the respondent, Marcelete Snowden Clark, in Bay Minette, Alabama on April 19th, 1956. We are resident citizens of Baldwin County, Alabama. I had suspected my wife was running around with a man from Daphne so on the night of November 23, 1956, I took Henry Atkinson with me to try to find her with this man. We run up on them on a side road. As soon as we got out of the car, Marcelete got out with this man, and even though it was hard to see them in the dark I knew it was Marcelete and I could see this switch blade in her hand. She started at me, cursing and threatening to kill me. Henry and I left.

This was not the first time that Marcelete has threatened me. On many occasions prior to this time, she has threatened me, and used abusive language to me, and I am really afraid that she would do me harm if I stay around her any longer.

*Charlie Clark*

I, Sarah E. Sammons 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 him and he signed the same in the presence of myself and James A. Brice 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 15 day of January 1957.

Sarah E. Sammons (L. S.)

No. 3967

Page

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

CHARLIE CLARK

COMPLAINANT

vs.

MARGARET SNODDEN CLARK

RESPONDENT

ORAL DEPOSITION

Filed \_\_\_\_\_, 194

**FILED**

JAN 16 1957

Register.

ALICE L. HARRISON

Record

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

Register

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO:

*Sarah E. Sarronous*

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 *Charlie Clark and*

*Terry Alkerson*

a witnesses in behalf of *Complainant* in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

*Charlie Clark*

and *Murcelate Snowden* ~~*Clark*~~ Complainant

Respondent

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

Witness *15* day of *January*, 195*7*

*Wesley Duck*  
Register.

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

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



WAIVER AND ANSWER

CHARLIE CLARK  
Complainant

VS.

MARCELETE SNOWDEN CLARK  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Comes the respondent in the above styled cause and accepts service of a bill of complaint filed heretofore 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.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

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

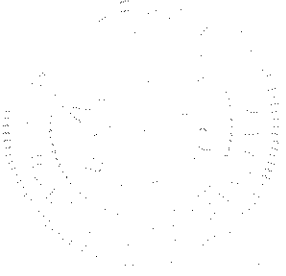
Marcelite Snowden Clark  
Respondent

THE STATE OF ALABAMA )  
BALDWIN COUNTY )

I, L. B. Perkins, a Notary Public in and for said County and State, do hereby certify that Marcelite Snowden-Clark, whose name is signed to the foregoing waiver, 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 on the day the same bears date.

IN WITNESS WHEREOF, I hereunto set my hand and official seal, on this the 31 day of Dec., 1956.

L. B. Perkins  
Notary Public



BILL OF COMPLAINT

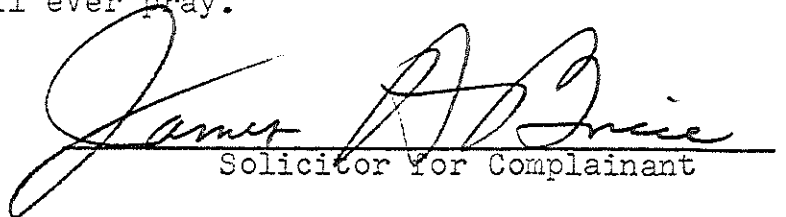
CHARLIE CLARK	)	
	)	
COMPLAINANT	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
V.	)	IN EQUITY
	)	
MARCELETE SNOWDEN CLARK	)	
	)	
RESPONDENT	)	

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

Comes your Complainant, Charlie Clark, and respectfully shows unto this Honorable Court as follows:

1. That he is a bona fide resident citizen of Baldwin County, Alabama; that Marcelete Snowden Clark, the respondent in this cause, is a resident citizen of the State of Alabama.
2. That on, to-wit, the 19th day of April, 1956, your complainant and respondent were intermarried in Baldwin County, Alabama and that your complainant and respondent are still husband and wife.
3. Your complainant avers and charges that the said respondent did on or about the 23rd day of November, 1956, act in an abusive, threatening and insulting manner toward your complainant; that said respondent on the 23rd day of November, 1956 committed acts of physical violence in the presence of your complainant attended with danger to his health or life; that respondent has made numerous threats of doing him physical harm and from her manner and conduct toward him, he is reasonably convinced that she will commit actual violence upon his person, attended with danger to his health or life; that on, to-wit, the 23rd day of November, 1956, he separated from and abandoned the said respondent, and is now living separate and apart from her.

THE PREMISES CONSIDERED, complainant prays that Marcelete Snowden Clark be made a party respondent to this Bill of Complaint by the usual process of this Honorable Court, and the statutes in such case made and provided, requiring her to plead, answer or demur within the time and in the manner provided by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your Complainant from said Respondent, granting the Complainant the right to remarry, and granting the Respondent the right to resume her maiden name; and Complainant further prays that your Honor will grant such other further, different and general relief to which the Complainant may be entitled, and as in duty bound he will ever pray.

  
 Solicitor for Complainant

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1 yk. res*

*w. 33601*

3952

Charlie Clark

vs.

Murcelite Snowden Club

Bill of Complaint

Phone #

FILED  
JAN 10 1957  
ALICE L. BOCK, REGISTER