

4020

DIVORCE DECREE

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

WILMA L. WILLIAMS, Complainant

vs.

ROBERT LEE WILLIAMS, JR., Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Conesso~~ Waiver and Answer, Agreement 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

WILMA L. WILLIAMS is forever divorced from the

said ROBERT LEE WILLIAMS, JR. for and on account of

"CRUELTY"

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the written Agreement between the parties, included as Exhibit "A" to the bill of complaint, be, and it is hereby ratified and confirmed and made a part of this decree and the parties hereto are ordered to keep and abide by its terms.

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 ROBERT LEE WILLIAMS, JR.

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

This 27 day of April 1957

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

Complainant

vs.

Respondent

DIVORCE DECREE

FILED  
APR 26 1951  
WILLIAM A. DICK, Registrar

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: JAMES R. OWEN

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 WILMA L. WILLIAMS

as witnesses in behalf of WILMA L. WILLIAMS in a cause pending in our Circuit Court in Baldwin County, of said State, wherein WILMA L. WILLIAMS

is the \_\_\_\_\_, Complainant  
and ROBERT LEE WILLIAMS, JR.

is the \_\_\_\_\_ 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 26th day of April, 1957

*W. J. H. H. H.*  
Register.

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

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

No. 402-D

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

WILMA L. WILLIAMS

Complainant

VS.

ROBERT LEE WILLIAMS, JR.

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

JAMES R. OWEN

WITNESSES:

WILMA L. WILLIAMS

*[Faint, mostly illegible text in the main body of the document, possibly bleed-through from the reverse side.]*

WILMA L. WILLIAMS

vs.

ROBERT LEE WILLIAMS, JR.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Plaintiff upon the original Bill of Complaint, Waiver and Answer, Agreement Between the Parties, and the Testimony of Wilma L. Williams

and in behalf of Defendant upon Waiver and Answer and Agreement Between the Parties.

*Allice J. Hester*

Register.

*Delain J. Maddox, Jr.*

No. 210213

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

**WILMA L. WILLIAMS**

**vs.**

**ROBERT LEE WILLIAMS, JR.**

**NOTE OF TESTIMONY**

Filed in Open Court this 26th

day of April, 1957

*Archie J. Smith*  
Register.

WILMA L. WILLIAMS

Complainant

vs.

ROBERT LEE WILLIAMS

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 reside within one hundred miles from  
Bay Minette, in the County of Baldwin  
Alabama, the place of trial of said cause, to-wit: WILMA L. WILLIAMS

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

*Jelmer J. Malbury Jr.*  
Solicitor for Complainant

NOTE:

Complainant suggests the name of JAMES R. OWEN  
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

*Jelmer J. Malbury Jr.*  
Solicitor for Complainant

402 D

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DEMAND FOR ORAL EXAMINATION

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WILMA L. WILLIAMS

Complainant

vs.

ROBERT LEE WILLIAMS, JR.

Respondent

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

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Filed this 26<sup>th</sup> day of April

1957 FILED

APR 26 1957

ALICE J. MOORE, Register

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Moore Printing Co., Register



THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

WILMA L. WILLIAMS

Complainant

VS.

ROBERT LEE WILLIAMS, JR.

Respondent

JAMES R. OWEN

I,

as ~~Register and~~ Commissioner

have called and caused to come before me Wilma L. Williams

witness named in the Requirement for Oral Examination, on the 24th day of April  
1957, at the office of Telfair J. Mashburn, Jr.  
in Bay Minette, Alabama, and having first sworn said Witness to speak the  
truth, the whole truth, and nothing but the truth, the said Wilma L. Williams

doth depose and say as follows: "My name is Wilma L. Williams. I am the complainant in this cause and I am over the age of twenty-one years. I am a bona fide resident citizen of Baldwin County, Alabama. The respondent, ROBERT LEE WILLIAMS, JR., is over the age of twenty-one years and lives in Baldwin County, Alabama. I was married to the respondent in Lucedale, Mississippi, on the 6th day of January, 1950. We lived together as husband and wife in Baldwin County, Alabama, until the 6th day of April, 1957. We had been having trouble for a long time, and on that date my husband beat me, actually striking me with his fists, and I became convinced that it would be dangerous to my life or health to continue to live with him as his wife. We have four minor children, Glenda Faye Williams, age 5, Betty Lynette Williams, age 3, Barbara Dianne Williams, age 2, and Robert Michael Williams, age 10 months. For a long time, I put up with my husband's mistreatment because of the children--but I have become convinced that it is more harmful to the children to be around my husband and me fussing and fighting, than to be without a Father. My husband and I have entered into a written agreement with regard to custody and support and maintenance for the children, and alimony for me, a copy of which agreement is attached to the bill of complaint in this cause. I believe this agreement is fair and reasonable and I request that the Court ratify and confirm it. I am convinced that, under present conditions, my husband and I can never again live together as man and wife." Further deponent says not.

Wilma L. Williams

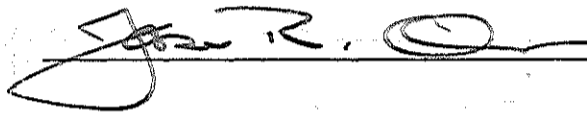
ORAL EXAMINATION.

I, JAMES R. OWEN, 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 Telfair J. Mashburn, Jr.

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 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 26<sup>th</sup> day of April, 1957.

 (L. S.)

NO. 4021 PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

WILMA L. WILLIAMS

vs. Complainant

ROBERT LEE WILLIAMS, JR.

Respondent.

Oral Deposition

Filed 24 April \_\_\_\_\_, 1957

Recorded in \_\_\_\_\_, Register.

FILED

Vol. \_\_\_\_\_ Page \_\_\_\_\_  
APR 24 1957

JAMES R. OWEN, Register

WILMA L. WILLIAMS,

Complainant,

VS.

ROBERT LEE WILLIAMS, JR.,

Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. \_\_\_\_\_

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

Your complainant, WILMA L. WILLIAMS, respectfully represents and shows unto your Honor as follows:

1. That complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona fide resident of said State for more than two years next preceding the filing of this bill of complaint; that Robert Lee Williams, Jr., is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama.

2. That your complainant and the respondent were lawfully married in Lucedale, Mississippi, on, to-wit: the 6th day of January, 1950.

3. Your complainant avers and charges that the said respondent did on or about the 6th day of April, 1957, and many times prior thereto, assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her life or health; complainant avers that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence on her person attended with danger to her life or health; and that, as a result of said treatment, she was forced to leave him on, to-wit: the 6th day of April, 1957, and has not since that time returned to live with him as his wife.

4. That there were four children born of this union, to-wit: Glenda Faye Williams, age 5, Betty Lynette Williams, age 3, Barbara Dianne Williams, age 2, and Robert Michael Williams, age 10 months.

5. That complainant and respondent have entered into an agreement with reference to custody and support and maintenance of said children, and with reference to alimony for your complainant, a copy of which agreement is hereto attached as Exhibit "A" and, by reference, made a part hereof as though fully set out herein.

BOOK 022 PAGE 138

Complainant avers that this is a reasonable, just and proper agreement and prays the Court that in the event a decree of divorce is given in this cause that the Court will decree that the parties keep and abide by the terms of said agreement.

WHEREFORE, THE PREMISES CONSIDERED, your complainant makes ROBERT LEE WILLIAMS, JR., a party respondent to this bill of complaint, and in order that complainant may have the relief herein prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said ROBERT LEE WILLIAMS, JR., commanding him to answer, plead or demur to this bill of complaint within the time required by law.

Your complainant prays that, on a final hearing of this cause, your Honor will make and enter a decree divorcing your complainant from said respondent, ratifying and confirming the agreement between the parties, Exhibit "A" to this bill of complaint, and ordering the parties hereto to keep and abide by the terms of said agreement; and your complainant prays for such other, further, different or general relief as unto your Honor may seem just and proper, and, as in duty bound, your complainant will ever pray, etc.

Julian J. Madelberg  
SOLICITOR FOR COMPLAINANT.

EXHIBIT "A"

STATE OF ALABAMA,     0  
                           0  
COUNTY OF BALDWIN.   0

BOOK 022 PAGE 199

THIS AGREEMENT, Made and entered into on this the 26<sup>th</sup> day of April, 1957, by and between WILMA L. WILLIAMS, hereinafter referred to as the party of the first part, and ROBERT LEE WILLIAMS, JR., hereinafter referred to as the party of the second part,

WITNESSETH:

WHEREAS, the parties hereto have been husband and wife for a period of more than seven years, and as a result of such union have four children: GLENDA FAYE WILLIAMS, age 5, BETTY LYNETTE WILLIAMS, age 3, BARBARA DIANNE WILLIAMS, age 2, and ROBERT MICHAEL WILLIAMS, age 10 months; and

WHEREAS, said parties have definitely concluded that under conditions now existing it is impracticable for them to live together as man and wife.

NOW, THEREFORE, IN CONSIDERATION THEREOF, and of the mutual agreements hereinafter made, they have mutually agreed to a complete separation under the following express terms and conditions:

1. The said parties shall entirely and completely separate as man and wife, live separate and apart, and neither party hereafter shall in any way harass, threaten, intimidate, or otherwise act in any way so as to embarrass or humiliate the other party.

2. The party of the first part shall have the custody, control and support of the above named children, and the party of the second part shall have the right at all reasonable and convenient times of access and visitation of said children and to have said children visit him at such times as such visits will not interfere with their schooling.

It is understood and agreed that if the best interests of said children make it desirable that this agreement be changed or modified, this agreement is subject to such change or modification upon the joint consent of the parties hereto. It is further agreed and understood that the children shall not be by either party hereto removed for any permanent period or permanent residence from the State of Alabama without the written consent of the other party.

BOOK 022 PAGE 200

3. The party of the second part agrees to pay to the party of the first part the sum of Thirty (\$30.00) Dollars per week for alimony and for support and maintenance of the said party of the first part and the minor children of this marriage. In addition to the above payments the party of the second part agrees to convey to the party of the first part the home in which they now live.

4. In the event the party of the first part insists on her express determination to file a suit for divorce against the party of the second part, it is agreed and understood that the party of the second part denies, and expects to continue to deny, that she is in any way entitled to a divorce, and in the event the Court, upon a hearing, should decided that the party of the first part is entitled to a divorce, then it is agreed and understood that this agreement and all of its terms shall be submitted to the Court for its approval, and shall not be executed until and unless the Court does approve it.

It is further agreed and understood that under such conditions the Court thereafter shall reserve and maintain its right in the interest and welfare of the children to make such changes in reference to the custody, control and support of the children as the Court may determine, after proper hearing with due notice, is in the bests interests of said children.

This agreement has been made and executed by the parties hereto on the day and date hereinabove first set forth, in good faith, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.

William L. Williams (SEAL)  
Robert Lee Williams (SEAL)

Executed in the presence of:

Jelaine G. Maslbury, Jr.  
Jelaine G. Maslbury, Jr.

WILMA L. WILLIAMS,  
 Complainant,  
 VS.  
 ROBERT LEE WILLIAMS, JR.,  
 Respondent,

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IN THE CIRCUIT COURT OF  
 BALDWIN COUNTY, ALABAMA.  
 IN EQUITY. NO. \_\_\_\_\_

WAIVER AND ANSWER

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

4. He admits the allegations contained in paragraph 4 of said bill of complaint.

5. He admits the allegations contained in paragraph 5 of said bill of complaint.

*R. L. Robert Lee Williams, Jr.*

Executed in the presence of:

*J. J. J. Madbury, Jr.*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.  
IN EQUITY. NO. 4020

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WILMA L. WILLIAMS,  
Complainant,

VS.

ROBERT LEE WILLIAMS, JR.,  
Respondent.

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WAIVER AND ANSWER.

FILED

APR 26 1957

ALICE A. WELLS, Register