

(4388)

DIVORCE DECREE

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BOBBY WILSON, Complainant

vs.

VIRGINIA JEAN WILSON, Respondent

answer and waiver

This cause coming on to be heard was submitted upon Bill of Complaint, Decree-Pro-Confession of defendant, 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 Bobby Wilson is forever divorced from the said Virginia Jean Wilson for and on account of

ABANDONMENT

It is further ordered, adjudged and decreed that the complainant, Bobby Wilson, be and he is hereby awarded the care and custody of the minor child, Grace Anita Wilson.

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 Bobby Wilson the complainant pay the cost herein to be taxed, for which executed may issue.

This 27 day of September 1958

Hubert M. Hill 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. 1398 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Bobby Wilson

Complainant

VS.

Virginia Wilson

Respondent

I, Madeline S. Bryars

as Register and Commissioner

have called and caused to come before me Bobby Wilson and
Grace Wilson

witnesses named in the Requirement for Oral Examination, on the _____ day of _____
195____, at the office of Beebe & Swearingen
in Bay Minette, Alabama, and having first sworn said Witness es to speak the
truth, the whole truth, and nothing but the truth, the said Bobby Wilson and
Grace Wilson doth depose and say as follows:

My name is Bobby Wilson. I am twenty-one years of age. Virginia Jean Wilson, who is 17 years of age, and I were married on December 31, 1955, at Lucedale, Mississippi. We lived together as husband and wife in Baldwin County until she abandoned me on September 25, 1957, and we have not lived together as husband and wife since said date. She left me without just cause or reasonable excuse. There was one child born to this marriage, her name is Grace Anita and she was born on November 1, 1956. She is in my custody and care and has been since November 4, 1957. Virginia Jean and I resided in Baldwin County from the date of our marriage until she abandoned me. I am a fit and proper person to have custody of Grace Anita Wilson.

Bobby Wilson

My name is Grace Wilson. I am the mother of Bobby Wilson. I am a resident of Baldwin County and have been for a number of years. Bobby and Virginia Jean were married on December 31, 1955 at Lucedale Mississippi. After their marriage they resided at Loxley in Baldwin County, Alabama. On September 25, 1957 she abandoned him without just cause or reasonable excuse and they have not lived together as husband and wife since that date. There was one child born to this marriage, her name is Grace Anita and she was born on November 1, 1956. She is in the custody and care of Bobby Wilson and has been since November 4, 1957. They live with me at my home in Loxley, Baldwin County, Alabama.

Grace Wilson

ORAL EXAMINATION.

I, Madeline S. Bryars, 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 es and read over to them and they signed the same in the presence of myself and F. G. Swearingen

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proom made before me of the identity of said witnesses; 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 27th day of Sept., 1958

Madeline S. Bryars (L. S.)

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NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY
IN CIRCUIT COURT, IN EQUITY

Becky Wilson
vs. Complainant

Virginia Jean Wilson
Respondent.

Oral Deposition

Filed FILED, 1958

SEP 27 1958
Register.

Recorded in 4461 Clerk
MAE J. DUNN, REGISTER Record

Vol. _____ Page _____

Register

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon, Virginia Jean Wilson, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction, within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a bill of complaint lately exhibited by Bobby Wilson against the said Virginia Jean Wilson and further to do and perform what said Judge shall order and direct in that behalf, and this the defendant shall in no wise omit under penalty of the law; and we further command that you return this writ with your endorsement thereon, to our said court immediately upon the execution thereof.

WITNESS, Alice J. Duck, Register of said Circuit Court, this the ___ day of _____, 1958.

Register

BOBBY WILSON,	§	IN THE CIRCUIT COURT OF
COMPLAINANT	§	
VS	§	BALDWIN COUNTY, ALABAMA,
VIRGINIA JEAN WILSON	§	
RESPONDENT	§	IN EQUITY

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

And now comes your complainant, Bobby Wilson, and humbly complaining against Virginia Jean Wilson, defendant, respectfully shows unto your Honor:

First: That your complainant is over the age of twenty-one years, that the defendant, Virginia Jean Wilson, is seventeen years of age, and that they are residents of Baldwin County, Alabama, where they resided at the time of their marriage and have resided continuously since.

Second: That your complainant and the said Virginia Jean Wilson, are husband and wife, having intermarried at Lucedale, Mississippi, December 31, 1955, and they lived together as husband and wife until September 25, 1957, when the said Virginia Jean

Wilson voluntarily abandoned this complainant without just cause and reasonable excuse; that the said Virginia Jean Wilson and this complainant have not lived together for more than twelve months next preceding the filing of this bill of complaint.

Third: That there was born to this complainant and the defendant one child, Grace Anita Wilson, who is two years old; that the said child is in the custody of your complainant at Loxley, Alabama; that the defendant is not a suitable person to have care and custody of the said child.

WHEREFORE your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said Virginia Jean Wilson party defendant hereto and by appropriate process require her to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court;

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this complainant and the said defendant; and complainant further prays that this Honorable Court will make and enter an order and decree awarding to this complainant the care and custody of the minor child, Grace Anita Wilson, and complainant prays for such other further or different relief as in equity and good conscience he shall be entitled to receive in the premises.

BEEBE & SWEARINGEN

BY 
Solicitors for complainant.

Bobby Wilson
Complainant
vs.
Virginia Jean Wilson
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: Bobby Wilson and Grace Wilson

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

Beebe & Swearingen
by J. H. Swearingen
Solicitor for Complainant

NOTE:

Complainant suggests the name of Medeline S. Bryers
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Beebe & Swearingen
by J. H. Swearingen
Solicitor for Complainant.

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DEMAND FOR ORAL EXAMINATION

Bobby Wilson
Complainant

vs.

Virginia Jean Wilson
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

FILED

Filed this SEP 28 day of 1958

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ALICE J. DUCK, CLERK
REGISTER

Register

Moore Printing Co.

Bobby Wilson

vs.

Virginia Jean Wilson

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, _____
 agreement as to custody of child, and testimony as noted by the
 Register

and in behalf of Defendant upon answer and waiver and agreement as to custody
 of the child

Beebe & Swearingen

by *J. E. Swearingen*

Alvin J. Duck

Register.

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No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Bobby Wilson

vs.

Virginia Jean Wilson

NOTE OF TESTIMONY

Filed in Open Court this

FILED

day of, 194

SEP 27 1958

ALICE J. DUCK, CLERK
REGISTER Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Madeline S. Bryars

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 Bobby Wilson and Grace Wilson

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

Bobby Wilson is, Complainant
and

Virginia Jean Wilson Respondent

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

Witness 27 day of Sept, 1958

Alvin J. Wuck
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

4388

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Bobby Wilson
Complainant—

VS.

Virginia Jean Wilson
Defendant—

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Mattew S. Pugh

WITNESSES:

FILED

SEP 27 1958

ALICE I. DUCK, CLERK
REGISTER

BOBBY WILSON

COMPLAINANT

VS

VIRGINIA JEAN WILSON

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

It is agreed between the parties in the above styled cause, that in the event decree of divorce is granted, the court shall award custody of the minor child, Grace Anita Wilson, to the complainant, Bobby Wilson.

Witness our hands this the 27 day of September, 1958.

Virginia Jean Wilson

Bobby Wilson

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Bobby Wilson
Complainant

VS

Virginia Jean Wilson
Respondent

Agreement as to
Custody of Child

FILED

SEP 27 1953

Alice J. Beck, CLERK
REGISTER

BOBBY WILSON

COMPLAINANT

VS

VIRGINIA JEAN WILSON

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

Comes Virginia Jean Wilson, defendant in the above styled cause, and answering complainant's complaint and every allegation therein made says the same are untrue, and she demands strict proof thereof.

Defendant waives notice of the application to take testimony, notice of the time and place of taking testimony, the right to cross examine complainant's witnesses, and notice of the submission of the cause for final decree, and agrees and consents that the said cause be submitted for final decree upon motion of complainant or his solicitor of record.

Witness my hand this the 27 day of September, 1958.

Virginia Jean Wilson
Defendant

WITNESS:

Madeline S. Buzus

4388

Bobby Wilson
Complainant

VS

Virginia Jean
Wilson
Respondent

Answer of Answer

FILED

SEP 27 1959

ALICE J. DUCK, CLERK
REGISTER