

(45 14)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

-----BILLIE JEAN HILL-----, Complainant

vs.

-----WILLIAM J. HILL-----, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree After Confession of Waiver and Answer~~ 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 BILLIE JEAN HILL is forever divorced from the said WILLIAM J. HILL ~~for and on account of~~

It is further ORDERED, ADJUDGED AND DECREED that the complainant BILLIE JEAN HILL, be, and she is hereby, awarded the care, custody and control of the minor child, DAVID MOORE HILL, with rights of reasonable visitation in the respondent, WILLIAM J. HILL.

It is futher 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 futher 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 futher ordered that BILLIE JEAN HILL the Complainant pay the cost herein to be taxed, for which executed may issue.

This 13 day of May 1959

*Libert M. Stea*  
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

May 13 1959

ALICE J. DUCK, CLERK  
REGISTER

BILLIE JEAN HILL

vs.

WILLIAM J. HILL

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,  
Waiver and Answer, and Testimony of BILLIE JEAN HILL

and in behalf of Defendant upon Waiver and Answer

*Julius J. Maduburn*  
*Solicitor for Complainant*

*Cliff J. Nuck*  
Register.

No. \_\_\_\_\_

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

**IN EQUITY**  
Circuit Court of Baldwin County

BILLIE JEAN HILL

VS.

WILLIAM J. HILL

**Note of Testimony**

Filed in Open Court this \_\_\_\_\_

**FILED**

day of \_\_\_\_\_

**MAY 12 1939**

19\_\_\_\_

**ALICE J. DUCK, CLERK**  
**REGISTER**

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

BILLIE JEAN HILL

COMPLAINANT

vs.

WILLIAM J. HILL

RESPONDENT

I, ALICE COX

as ~~Register and~~ Commissioner

have called and caused to come before me BILLIE JEAN HILL

witness named in the requirement for Oral Examination, on the 12th day of May  
19 59 , at the office of Telfair J. Mashburn

in Bay Minette, , Alabama, and having first sworn said witness to speak the  
truth, the whole truth, and nothing but the truth, the said BILLIE JEAN HILL

doth depose and say as follows: "My name is BILLIE JEAN HILL. I am the complainant in this cause and I am over the age of twenty-one years. I am a resident citizen of Bay Minette, Baldwin County, Alabama, and have been practically all of my life. The respondent, WILLIAM J. HILL, is over the age of twenty-one years and is a resident of Bay Minette, Baldwin County, Alabama. I was married to the respondent at Bay Minette, Alabama, on the 1st day of December, 1956. For the first few months of our married life, the respondent was a kind and loving husband, but after about a year, and particularly after our baby came he began to mistreat, abuse and threaten me. On the 23rd day of January, 1959, he committed an actual physical violence on my person at Wassen's Tavern at Perdido, in Baldwin County, Alabama; I forgave him for that, because I was trying so hard to make our marriage work, but his conduct toward me did not improve and, in fact, became worse. Finally, on April 4, 1959, his treatment of me became so bad that I became afraid that if I continued to live with him as his wife, he would commit physical violence on my person which would necessarily endanger my life or health. I ceased to live with him as his wife at that time and have not consorted with him since. I am convinced that we will never again be able to live together as husband and wife. We have one child, a little boy, DAVID MORRE HILL, who is now 1 year of age. I believe I am the proper person to have the care, custody and control of this child, and that it would be to his best interest to be placed in my custody." Further deponent says not.

Billie Jean Hill

ORAL EXAMINATION

I, ALICE COX 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 Telfair J. Mashburn 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 12th day of May, 1959.

*Alice Cox* (L. S.)

No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

BILLIE JEAN HILL

COMPLAINANT

VS.

WILLIAM J. HILL,

RESPONDENT

ORAL DEPOSITION

Filed \_\_\_\_\_, 19

, Register.

RECORDED IN  
**FILED**  
Record

Vol. \_\_\_\_\_ MAY 12 1959 Page \_\_\_\_\_

ALICE L. COX, CLERK  
REGISTER

Register.

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: ALICE COX

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 BILLIE JEAN HILL

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

BILLIE JEAN HILL

is the \_\_\_\_\_, Complainant  
and WILLIAM J. HILL

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

Witness 12th day of May, 1949

Alice Cox  
Register.

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

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

No. \_\_\_\_\_

**THE STATE OF ALABAMA  
Baldwin County**

**CIRCUIT COURT**

Complainant \_\_\_\_\_

VS.

Defendant \_\_\_\_\_

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

WITNESSES:  
**FILED**

MAR 12 1929

ALICE J. DUCK, CLERK  
REGISTER

Subscribed and sworn to before me this 12th day of March 1929 at \_\_\_\_\_ in Baldwin County, Alabama.

Given under my hand and the seal of the Court at the City of \_\_\_\_\_ Baldwin County, Alabama, this 12th day of March 1929.

Notary Public in and for the State of Alabama

My commission expires \_\_\_\_\_

Witness my hand and seal of office at \_\_\_\_\_ this 12th day of March 1929.

Notary Public in and for the State of Alabama



The State of Alabama, {  
Baldwin County }

-----  
BILLIE JEAN HILL  
-----

-----  
Complainant  
-----

VS.

-----  
WILLIAM J. HILL  
-----

-----  
Defendant  
-----

CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA

In Equity.

The Complainant, BILLIE JEAN HILL  
-----

requests the oral examination of the following named witnesses, on behalf of the  
-----

Complainant  
-----

- viz:

-----  
BILLIE JEAN HILL  
-----

said witnesses reside in the County of BALDWIN  
-----

State of Alabama.

ALICE COX  
-----

who resides at

Bay Minette, Alabama  
-----

----- or, The Register of this Court is suggested as a suitable person  
to be appointed Commissioner to take the deposition of said witness on such oral examination.

*J. J. Maslow*  
-----

Solicitor for Complainant.  
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CIRCUIT COURT OF  
Baldwin County, Alabama

IN EQUITY

BILLIE JEAN MOUL

Complainant

vs.

WILLIAM J. HILL.

Defendant

DEMAND FOR ORAL EXAMINATION

Filed

FILED

19

MAY 12 1905

ALICE I. DICK, CLERK  
REGISTER

Register.

BILLIE JEAN HILL,  
Complainant,  
VS.  
WILLIAM J. HILL,  
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, BILLIE JEAN HILL, 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; that WILLIAM J. HILL is  
over the age of twenty-one years and is a resident of said State  
and County;

2. That your complainant and the respondent were lawfully  
married at Bay Minette, Alabama, on, to-wit: 1st day of December,  
1956.

3. That on, to-wit: the 23rd day of January, 1959, respon-  
dent committed an actual violence on the person of your complain-  
ant, attended with danger to her life or health; and that from  
his manner and conduct toward her, your complainant became reason-  
ably convinced that, should she continue to live with him as his  
wife, he will commit an actual violence upon her person which will  
necessarily endanger her life or health; and she is afraid to return  
to live with him as his wife.

4. That there is one child as a result of this marriage,  
David Moore Hill, one year of age; and that your complainant is a  
fit and proper person to have the care, custody and control of said  
child;

THE PREMISES CONSIDERED, Your complainant makes the said  
WILLIAM J. HILL a party respondent to this her bill of complaint,  
and in order that she may have the relief hereinafter prayed for,  
may it please your Honor to cause the State's Writ of Subpoena to  
be issued to the said WILLIAM J. HILL, commanding him to answer,  
plead or demur to this bill of complaint within the time required  
by law; and your complainant further prays that, on a final hearing  
of this cause, your Honor will make and enter a decree divorcing  
your complainant from the respondent and giving her the care, custody

and control of their said minor child, DAVID MOORE HILL, with rights of reasonable visitation in the respondent, WILLIAM J. HILL; 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.

FILED

NOV 12 1959

ALICE J. DUCK, CLERK  
REGISTER

William J. Madeline  
SOLICITOR FOR COMPLAINANT.

BILLIE JEAN HILL,  
Complainant,  
VS.  
WILLIAM J. HILL,  
Respondent.

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

WAIVER AND ANSWER.

Comes now WILLIAM J. HILL, the respondent in the above styled cause and accepts service of a copy of the bill of complaint in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross the 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 heretofore filed in this cause, respondent says:

1. That he admits the allegations contained in paragraph 1 of said bill of complaint;
2. That he admits the allegations contained in paragraph 2 of said bill of complaint;
3. That he denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof thereof;
4. That he admits the allegations contained in paragraph 4 of said bill of complaint.

*William J. Hill*  
RESPONDENT.

WITNESS:

*Jessie S. Madeline*

FILED

MAY 12 1959

ALICE I. DUCK, CLERK  
REGISTER

1574

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

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BILLIE JEAN HILL,  
Complainant,

VS.

WILLIAM J. HILL,  
Respondent,

\*\*\*\*\*

WAIVER AND ANSWER.

FILED

MAY 12 1959

MARGE J. DUCK, CLERK  
REGISTER