

4794

DIVORCE DECREE

MOORE PRINTING COMPANY - EAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

EDITH S. HILL, Complainant

vs.

WILLIAM J. HILL, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, 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 EDITH S. HILL is forever divorced from the said WILLIAM J. HILL for and on account of

[Empty lines for additional text]

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

This 18 day of December 19 59

[Handwritten signature]

Judge Circuit Court, In Equity.

I, [blank], 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 [blank] day of [blank], 19 [blank]

[blank] Register of Circuit Court, In Equity.

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No. 4794 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED
DEC 12 1950
ALICE J. DUCK, CLERK
REGISTER

EDITH S. HILL

Complainant,

VS.

WILLIAM J. HILL

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: EDITH S. HILL

.....
.....
.....
.....

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

J. Connor Owens, Jr.
Solicitor for Complainant.

NOTE:

Complainant suggests the name of J. CONNOR OWENS, JR.,

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

J. Connor Owens, Jr.
Solicitor for Complainant.

4794

DEMAND FOR ORAL EXAMINATION.

EDITH S. HILL

Complainant,

Vs.

WILLIAM J. HILL

Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA—IN EQUITY.

Filed this FILED day of

194.....

DEC 17 1959

ALICE J. DUCK, CLERK
REGISTER

Register.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

EDITH S. HILL,

COMPLAINANT

vs.

WILLIAM J. HILL,

RESPONDENT

I, J. CONNOR OWENS, JR.,

as Register and Commissioner

have called and caused to come before me EDITH S. HILL

witness named in the requirement for Oral Examination, on the 12th day of December
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 EDITH S. HILL

doth depose and say as follows: "My name is Edith S. Hill. 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 the State of Alabama, and have been so for more than the last pasttwo years. The respondent, WILLIAM J. HILL, is over the age of twenty-one years and is a bona fide resident citizen of the State of Alabama. The respondent and I were married in Chatom, Alabama, on the 16th day of October, 1959. Shortly after our marriage the respondent began to stay away from home without excuse. Around Thanksgiving, he was gone the whole week-end, and I believe he was with another woman. When I would remonstrate with him about his actions, or question him about where he had been, he would curse and abuse me and threaten to do physical violence to my person. Because of his abuse and threats, I finally became reasonably convinced that, should I continue to live with him as his wife, he would carry out his threats and do physical violence to my person which would necessarily endanger my life or health. Because of his treatment, I was finally forced to leave him on the 7th of December, 1959, and I am sure that we can never live together as husband and wife. " Further Deponent says not.

Edith S. Hill

ORAL EXAMINATION

I, J. CONNOR OWENS, JR., 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 17th day of December 19 59 .

J. Connor Owens (L. S.)

No. 4794 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EDITH S. HILL

COMPLAINANT

VS.

WILLIAM J. HILL

RESPONDENT

ORAL DEPOSITION

Filed

FILED

, 19

DEC 17 1959

ALICE L. MURPHY, CLERK
REGISTER
RECORDED IN

Record

Vol.

Page

, Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: J. CONNOR OWENS, JR.

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 EDITH S. HILL

a witness in behalf of the Complainant
Circuit Court in Baldwin County, of said State, wherein

in a cause pending in our

EDITH S. HILL

is the

, Complainant

and

WILLIAM J. HILL

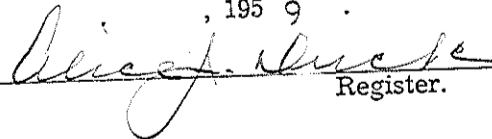
is the

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 17 day of December

, 195 9


Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 4794

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

EDITH S. HILL

Complainant

VS.

WILLIAM J. HILL

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

FILED

WITNESSES:

DEC 17 1959

ALICE J. DUCK, CLERK
REGISTER

EDITH S. HILL,
Complainant,
VS.
WILLIAM J. HILL,
Respondent.

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

WAIVER AND ANSWER

COMES the respondent in the above styled cause, WILLIAM J. HILL, and accepts service of a copy of the bill of complaint in this cause and 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 heretofore filed in this 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 of the same.

Witness:
J. J. Marshall

William J. Hill
RESPONDENT

FILED
DEC 17 1930
ALICE L. DUCK, CLERK
REGISTER

EDITH S. HILL

THE STATE OF ALABAMA
Baldwin County

vs.

WILLIAM J. HILL

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, Waiver and Answer, and Testimony of EDITH S. HILL

and in behalf of Defendant upon Waiver and Answer

Superior J. Maddox
Solicitor for Complainant

Alvin J. ...
Register.

m
No. 4794

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

EDITH S. HILL

VS.

WILLIAM J. HILL

Note of Testimony

Filed in **FILED** Open Court **10**s

day of **DEC 17** 19**59**, 19

ALICE L. DUCK CLERK
REGISTER

Register.

EDITH S. 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, EDITH S. HILL, respectfully represents and
shows unto your Honor as follows:

1. That she is over the age of twenty-one years and is a
bona fide resident citizen of Alabama, and has been for more
than the last past two years; that the respondent, WILLIAM J. HILL,
is over the age of twenty-one years and a bona resident citizen of
the State of Alabama;

2. That your complainant and the respondent were lawfully
married on or about, towit: the 18th day of October, 1959, at

3. That shortly after their marriage the respondent began to
stay away from home, without reasonable excuse; that when your com-
plainant would remonstrate with him for his actions, he would curse
and abuse her and threaten to do physical violence to her person;
that because of his abuse and threats your complainant has become
reasonably convinced that, should she continue to live with him as
his wife, he will commit an actuall violence to her person which
would necessarily endanger her life or health; that because of his
said treatment she has been forced to leave him and can no longer
live with him as his wife;

THE PREMISES CONSIDERED, your complainant makes the said
WILLIAM J. HILL a party respondent to this her bill of complaint,
and, in order that complainant may have the relief hereinafter
prayed, may it please your Honor to cause the State's Writ of Sub-
poena to be issued, directed to the said WILLIAM J. HILL, command-
ing him to plead to, answer or demur to this bill of complaint
within the time required by law; your complainant further prays that,
on a final hearing of this cause, your Honor will make and enter a
decree forever divorcing her from the said WILLIAM J. HILL; and your
complainant prays for such other, further, different or general re-
lief, as in equity and good conscience she may be entitled to receive,

and, as in duty bound, she will ever pray, etc.

FILED

DEC 17 1959

ALICE J. DUCK, Register

J. J. M. M. M.
SOLICITOR FOR COMPLAINANT