

(2940)

# The State of Alabama, Baldwin County CIRCUIT COURT, IN EQUITY

Imogene C. Peed, Complainant

VS.

Billie Peed, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on 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

Imogene C. Peed

is forever divorced from the said Billie Peed

for and on account of Cruelty

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 Imogene C. Peed and Billie Peed be, and is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Imogene C. Peed the Complainant pay the cost herein to be taxed, for which execution may issue.

This 2nd day of January, 1953.

T. J. ...  
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

Imogene C. Feed

vs. Complainant.

Billie Feed

Respondent.

**DIVORCE DECREE**

FILED

1-2-53

ALICE A. DUCK, Registrar

Imogene C. Feed

vs.

Billie Feed

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, \_\_\_\_\_  
answer and waiver of respondent and testimony of Imogene C. Feed

and in behalf of Defendant upon \_\_\_\_\_

*[Handwritten signature]*  
Sol. for Com.

*[Handwritten signature]*

Register.

No. 2-940

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

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

Imogene C. Reed

vs.

Billie Reed

**NOTE OF TESTIMONY**

Filed in Open Court this 2nd

day of Jan, 1943

*W. J. French*

Register

Printed By The Baldwin Times

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons BILLIE FEED to appear and plead, answer or demur within thirty days from the service hereof to the bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by IMOGENE C. FEED, as Complainant and against Billie Feed as Respondent.

WITNESS my hand this the 7 day of January, 1953.

Register

IMOGENE C. FEED  
COMPLAINANT

VS

BILLIE FEED  
RESPONDENT

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

TO HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Imogene C. Feed, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is twenty years of age and a bona fide resident of Baldwin County, Alabama; that the Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama.

2.

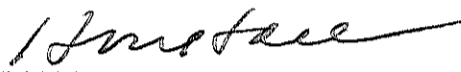
That your Complainant and the Respondent married at Bay Minette, Alabama, on August 8, 1951, and lived together as husband and wife until on to-wit June 5, 1952.

3.

That on to-wit, June 5, 1952, and on various occasions prior thereto the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Billie Feed party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

~~Your Complainant further prays that upon a final hearing hereof your~~  
Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant

294D

RECORDED

IMOGENE C. PEED

COMPLAINANT

VS

BILLIE PEED

RESPONDENT

BILL OF COMPLAINT

FILED

1-2-53

ALICE J. DUCK, Register

EUGENE C. FEED  
COMPLAINANT  
VS  
BILLIE FEED  
RESPONDENT

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

Now comes the Respondent and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, residences and marriage, but denies all other allegations contained in the bill of Complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

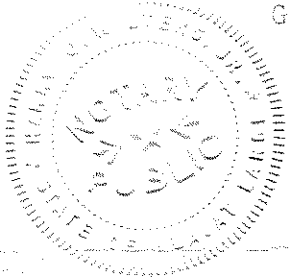
Billie Feed

STATE OF ALABAMA  
BALDWIN COUNTY

I, Harry J. Winters, Jr., a Notary Public, in and for State of Alabama, at Large, hereby certify that Billie Feed, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 2 day of January, 1953.

Harry J. Winters, Jr.  
Notary Public





RECORDED  
RECORDED

2948

IMOGENE C. PEED

COMPLAINANT

VS

BILLIE PEED

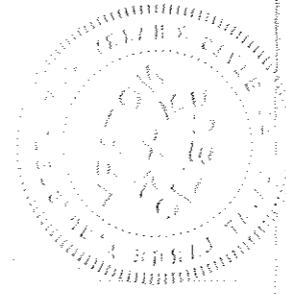
RESPONDENT

ANSWER AND WAIVER

FILED

1-2-53

ALICE J. DUCK, Register



THE STATE OF ALABAMA  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Imogene C. Peed Complainant

VS.

Billie Peed Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Imogene C. Peed

witnesses named in the Requirement for Oral Examination, on the 2 day of January 1945, at the office of Hubert M. Hall

in Bay Minette, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said Imogene C. Peed

doth depose and say as follows:

My name is Imogene C. Peed. I am twenty years of age and a resident of Baldwin County, Alabama. I have been a resident of Baldwin County all my life. The Respondent Billie Peed is over twenty-one years of age and have been a resident of Baldwin County, Alabama, for a greater part of three years. The Respondent and I married at Bay Minette, Alabama, on August 8, 1951. We lived together as husband and wife until June 5, 1952. The Respondent and I have no children and no community property.

It developed soon after our marriage that the Respondent and I could not live together in any peace. The Respondent often threatened and abused me and threatened to do violence to my person which would necessarily endanger my life and health. The conduct of the Respondent was such as to give me every reasonable apprehension to believe and I did believe that if I lived with him he would carry out his threats and do violence to my person which would necessarily endanger my life and health. I am fully satisfied that the Respondent and I can never make a go of it, and know that it is to the best interest to both of us that we be granted a divorce. I know that there is no love between the Respondent and me.

Imogene Clemmons Peed

**ORAL EXAMINATION.**

I, Evelyn Watts, 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 Hubert M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness \_\_\_\_\_ or had proom 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 2nd day of January, 1945.

Evelyn Watts (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Imogene C. Peed

vs. Complainant

Billie Peed

Respondent.

**Oral Deposition**

Filed \_\_\_\_\_, 1945

**FILED**

1-2-5-3  
Register.

MADE BY  
Recorded in Register

Record

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

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Evelyn Watts

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 Imogene C. Peed

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Imogene C. Peed

Complainant  
and Billie Peed

Respondent

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

Witness 2nd day of June, 1952

Register.

Commissioner's Fee, \$  
Witness' Fees, \$

No. 2948

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

**CIRCUIT COURT**

Imogene C. Peed

Complainant—

vs.

Billie Peed

Defendant—

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER

Evelyn Watts

WITNESSES:

Imogene C. Peed