

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

ANNIE O'NEAL

Complainant

VS.

GRADY O'NEAL

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~  
on Answer & Waiver of the Respondent 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 here-  
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,  
and that the said Annie O'Neal  
is forever divorced from the said Grady O'Neal

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 the Complainant and Respondent be, and they are hereby permitted  
to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Annie O'Neal  
the Complainant pay the cost herein to be taxed, for which execution may issue.

This 25<sup>th</sup> day of January, 1945

[Signature]  
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. 126 Page \_\_\_\_\_

**The State of Alabama**  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

vs. Complainant

Respondent

**DIVORCE DECREE**

Filed this \_\_\_\_\_ day of \_\_\_\_\_  
\_\_\_\_\_, 194\_\_\_\_\_

Register

THE STATE OF ALABAMA,  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

ANNIE O'NEAL \_\_\_\_\_ Complainant

VS.

GRADY O'NEAL \_\_\_\_\_ Respondent

Lillian Patterson \_\_\_\_\_

I, \_\_\_\_\_  
as ~~Register and~~ Commissioner \_\_\_\_\_

have called and caused to come before me Annie O'Neal and Miriam Allen

witness<sup>es</sup> named in the Requirement for Oral Examination, on the 24th day of January  
194<sup>5</sup>, at the office of Beebe & Hall  
in Bay Minette, Alabama, and having first sworn said Witness<sup>es</sup> to speak the  
truth, the whole truth, and nothing but the truth, the said Annie O'Neal  
doth depose and say as follows:

My name is Annie O'Neal. I am a bona fide resident of Bay Minette, in Baldwin County, Alabama, and over twenty-one years of age. The Respondent is over twenty-one years of age and a bona fide resident of the state of Alabama. The Respondent and I married in Montgomery, Alabama, on the 27th day of February, 1943, and we lived together as husband and wife until on to-wit: December 26, 1944. The Respondent on the 26th day of December, 1944, and at various times prior thereto cursed, threatened and abused me, and often 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 actually believe that if I continued to live with him he would carry out his threats and do actual violence to my person, which would necessarily endanger my life and health. The condition are such that the Respondent and I can never live together as husband and wife.

Annie O'Neal

Miriam Allen, a witness for the Complainant being first duly sworn, deposes and says: My name is Miriam Allen. I live near Bay Minette, in Baldwin County, Alabama. I am personally acquainted with the Complainant and the Respondent in this cause. I have had occasion be around and know much of them during the time that they lived together as husband and wife. I know that they often scrapped, and that the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe and I know that she did actually believe that if she continued to live with the Respondent he would carry out his threats and do violence to her person, which would necessarily endanger her life and health. It is my opinion and belief that they are of such type that they can never live together as husband and wife.

Miriam Allen

**ORAL EXAMINATION.**

I, Lillian Patterson, 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 Hubert M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; 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 24th day of January, 194 5, 194    .

Lillian Patterson (L. S.)

NO. 1262 PAGE 1

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

vs. Complainant

Respondent.

**Oral Deposition**

Filed B. J. Hall, 1945  
Register.

Recorded in \_\_\_\_\_  
Record

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

ANNIE O'NEAL

COMPLAINANT

VS.

GRADY O'NEAL

RESPONDENT

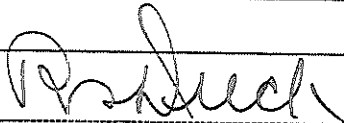
THE STATE OF ALABAMA  
Baldwin County

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 the Respondent, testimony of Annie O'Neal and  
Miriam Allen

and in behalf of Defendant upon Answer and Waiver



Register.

No. 1262

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

vs.

**NOTE OF TESTIMONY**

Filed in Open Court this 24

day of June 1965

[Signature]  
REGISTER

THE STATE OF ALABAMA, }  
Baldwin County }

CIRCUIT COURT

TO Lillian Patterson

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 Annie O'Neal and Miriam Allen

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Annie O'Neal

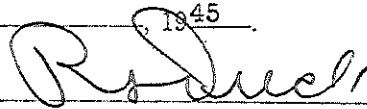
Complainant  
and Grady O'Neal

Defendant,

on oath to be by you administered, upon Annie O'Neal and Miriam Allen

to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 24th day of January, 1945.



REGISTER

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

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

1262 NO. \_\_\_\_\_

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Complainant \_\_\_\_\_

VS.

Defendant \_\_\_\_\_

Commission To Take Deposition

COMMISSIONER:

Witnesses:



STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - - GREETINGS;

WE COMMAND YOU, that you summon GRADY O'NEAL 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 plead, answer or demur without oath to a bill of complaint lately exhibited by Annie O'Neal, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court, immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court this the 24 day of January, 1945.

  
Register

ANNIE O'NEAL  
COMPLAINANT  
  
VS.  
  
GRADY O'NEAL  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
  
IN EQUITY

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY;

Now comes your Complainant, Annie O'Neal, and humbly complaining against the Respondent, Grady O'Neal, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both bona fide residents of the State of Alabama, and are over twenty-one years of age;

2.

That the Complainant and the Respondent were married at Montgomery, Alabama, on February 27, 1943, and lived together as husband and wife until December 26, 1944;

3.

That on to-wit, December 26, 1944, and at various times prior thereto, the Respondent threatened, cursed, and abused the Complainant, and

that on several occasions 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 the Complainant every reasonable apprehension to believe, and she did actually believe that if she continued to live with him, he would carry out his threats and do 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 Grady O'Neal party Respondent to this cause of action, 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.

The Complainant further prays that upon the final hearing hereof, your Honor will enter a decree, awarding to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that your Honor will give and grant to her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound, she will ever pray.

BEEBE & HALL

By: 

Solicitors for the Complainant



ANNIE O'NEAL,

Complainant,

vs

GRADY O'NEAL,

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY

Now comes the Respondent, in his own proper person, and accepts service of summons and complaint in this cause.

The Respondent admits that he and the Complainant are husband and wife and that they are both bona fide residents of the state of Alabama, and over twenty-one years of age; that they married in Montgomery, Alabama, on the 27th day of February, 1943; that he 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 testimony on the part of the Complainant; the right to cross examine the Complainant's witnesses; and agrees that this cause be submitted forthwith for final decree without notice.

Witnesses:

Grady O'Neal

ANNIE O'NEAL  
COMPLAINANT

VS.

GRADY O'NEAL  
RESPONDENT

ANSWER AND WAIVER

*24 1945*  
*Grady O'Neal*  
*Deputy*