

	Agnes ward Flowers	Complainant
1	S. E. Flowers	
***	Or E. LTONOLD	Respondent
the state of the s	be heard was submitted upon Bill of C	francisco de la companya del la companya de la comp
on enswer of respon	ndent and Testimony as	noted by the Register, and upon
consideration thereof, the Co for in said bill.	ourt is of the opinion that the Complains	ant is entitled to the relief prayed
	adjudged and decreed by the Court the Complainant and Defendant be, and	
DILLE BARRET BARRET BARRET	mes Ward Flowers	. of
is forever divorced from the		
<u> </u>	E. Flowers	
for and on account of	cruelty,	
It is further or	dered and decreed that the	maiden name of
respondent, name	ly: Agnes Ward, be, and t	he same hereby is,
restored to her.		
and the second s	a contract of the commence of	
except to each other until s	judged and decreed that neither party ixty days after the rendition of this dearty shall again marry except to each of	cree, and that if appeal is taken
It is further ordered that	at complainant and resp	ondent
be, and are hereby per this suit.	mitted to again contract marriage upo	n the payment of the cost of
It is further ordered that	at complainant	
70 SC		
粉巻	pay the cost herein to be taxed, for wh	ich execution may issue.
This day of	February	,19 <u>45</u> .
	1	WHare
	Judg	e Circuit Court, in Equity.
r	:	, Register of the Circuit
	Court of Baldwin County, Alaba	
	foregoing is a correct copy of the Judge of the Circuit Court in the decree is on file and enrolled in	original decree rendered by the above stated cause, which said
	Witness my hand and seal th	•
	of	, 19
	· ·	
	Register of	Circuit Court, in Equity.
? <i>a</i>		_

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No.	267 Page
The	e State Of Alabama
	Baldwin County
In C	ircuit Court, In Equit
	*
············	vs. Complainant.
••••••	
-	•
••••••	Respondent.
D	IVORCE DECREE

y.

THE STATE OF ALABAMA) Baldwin County

Circuit Court of Baldwin County, Alabama, (In Equity)

	Agnes	Ward Flor	wers	COMPLAIN	ANT	
		vs.				
	S. E.	Flowers		RESPONDE	INT	
R. S.	Duck		1			
as Register and Commissioner					eg en en	. The standard control of the
have called and caused to com	ne before r	ne Ag	gnes Ward	Flowers	and Me	elba
Lean Flowers						
				, · · · · · · · · · · · · · · · · · · ·		
witness es named in the rec					y of Ja	nuary
in Bay Minette	, Alab	ama, and hav	ving first swor	n said witne	esses_	to speak the
truth, the whole truth, and no	thing but t	the truth, the	said <u>Agn</u>	es Ward	Flower	<u>'S</u>
		doth	_depose and_sa	ay as follows) <u></u>	anna (Sana) a maaraa ahaal

My name is Agnes Ward Flowers. I am the complainant in this cause for divorce against the respondent, S. E. Flowers. I am over the age of twenty-one years and am, now, and have been for more than one year next preceding the filing of my bill of complaint in this cause a bona fide resident of Baldwin County, Alabama. The said S. E. Flowers is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

I and the respondent, S. E. Flowers, were lawfully married to each other on November 3, 1944, at Bay Minette, Alabama, by a justice of the peace and lived together as man and wife until January 22, 1945.

On said last date of January 22, 1945, the respondent committed actual violence on my person attended with danger to my life or health and from his conduct there was reasonable apprehension of further acts of actual violence by him on my person attended with danger to my life or health. On said last date he threatened to do me serious bodily injury or harm other than he had done and threatened and abused me and I fearing for the safety of my life or health refused to live with him further as his wife and we have not lived together as man and wife since said last date. The respondent was a man of ungovernable temper and nothing I did seemed to suit him. He was continually threatening and abusing me to such extent that I became very nervous and rundown in my health, and aside from physical harm, I knew that if I continued to live with him as his wife I would have a complete breakdown. Since said last date, we have not lived together as man and wife.

I would like to have my maiden name of Agnes Ward restored.

Agnes Ward Flowers

Melba Lean Flowers, being first by me duly sworn, deposes and says in substance as follows:

My name is Melba Lean Flowers. I am over the age of twentyone years and reside in Baldwin County, Alabama. I am a sister
of the complainant in this case and have been knowing the respondent for about six months. I have visited them frequently in
their home which was near me. I have read over her testimony and
know that it is substantially true. On nearly every occasion that
I visited their home, the respondent would scold and quarrel and
I have heard him threaten to strike her. On account of all this,
she was highly nervous and in a randown condition, and I know that
if she continued to live with him she would completely lose her
health even if she were not seriously injured by him.

Mellow Lean Flowers

I, 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 have and have signed the same in the presence of myself and 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 day of the largest of the said Court. (L. S.)
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 — day of ———————————————————————————————————
at the time and place herein mentioned; that I have personal knowledge of personal 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 —— day of ———————————————————————————————————
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 2 day of 1945
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 2 day of 1945
I enclose the said Oral Examination in an envelope to the Register of said Court. Given under my hand and seal, this 2 day of 1945
Given under my hand and seal, this 39 day of 1945.
(L.S.)
No. /
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Agnes Ward Flowers		THE STATE OF ALABAMA, BALDWIN COUNTY
VS. S. E. Flowers		IN EQUITY CIRCUIT COURT OF BALDWIN COUNTY
answer and waiver of re	spondent	upon the original Bill of Complaint, and cral depositions of the y: Agnes Ward Flowers and

and in behalf of Defendant upon	answer.	

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The State of Alabama, BALDWIN COUNTY

IN EQUITY

CIRCUIT	COURT	OF	BALDW	IN C	OUNTY
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NOTE OF TESTIMONY

Filed in Open Court this 29

day of

1945

Register.

Moore Printing Co.

AGNES WARD FLQWERS
Complainant,

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

S. E. FLOWERS
Respondent.

ANSWER OF RESPONDENT

Now comes the respondent, S. E. Flowers, and for answer to the bill of complaint filed in this cause against him by the complainant, Agnes Ward Flowers, he denies each and every allegation of the said bill of complaint and demands strict proof thereof.

And he, the said respondent, waives all service of notice or process of the filing of said bill of complaint, and further waives all notice of the taking of testimony in said cause and further waives all notice of the submission of said cause for final decree.

SE Florese Respondent

VITNESSES: Hamilton

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2000 July 29 1946

Agnes Ward Flowers, Complainant,

vs

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

S. E. Flowers, Respondent.

TO THE HONORABLE F. W. HARE, JUDGE OF SAID COURT;

Comes now your complainant, Agnes Ward Flowers, and brings this her bill of complaint against the respondent, S. E. Flowers, and respectfully alleges unto your Honor and the Court as follows:

- l. She and respondent are each over the age of twenty-one years. Complainant is, and has been for more than one year next preceding the filing of this her bill of complaint, a bona fide resident of Baldwin County, Alabama, and the respondent is a resident of Baldwin County, Alabama.
- 2. Complainant and respondent were lawfully married to each other on the 3rd day of November, 1944, and lived together as man and wife until, to-wit: the 22nd day of January, 1945.
- 3. On said last date of to-wit: January 22,1945, respondent committed actual violence on the person of complainant attended with danger to her life or health and from his conduct there was reasonable apprehension of further acts of actual violence by respondent on the person of complainant attended with danger to her life or health. On said last date respondent also threatened to do complainant serious bodily harm other than he did or had done, and threatened and abused complainant and complainant fearing for the safety of her life or health refused to live with him further as his wife and they have not lived together as man and wife since said last date.
 - 4. The maiden name of complainant was Agnes Ward.

WHEREFORE, the premises considered, complainant prays that the said S. E. Flowers be made party respondent to this her bill of complaint and that due process of law issue forthwith for service upon him.

And complainant further prays that upon the final hearing of this cause your Honor and the Court will be pleased to give and grant to her a decree of absolute divorce from the said S. E. Flowers, the respondent, and will give and grant to complainant permissionanto again marry should she see fit so to do, and will further restore to complainant her maiden name of Agnes Ward; and complainant further prays for all such other further and other orders, decrees and relief as she may be entitled to receive.

Agnes Ward Flowers.
Complainant.

Solicitor for Complainant.

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The Janay 29
Ported 1945