

12710
PETITIONER'S EXHIBIT
H AD
19-22-85
FENGAD-BYRONNE, N. J.

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

Josephine Knight Complainant

VS.

Albert Junior Knight 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 Josephine Knight is forever divorced from the said Albert Junior Knight

for and on account of Adultery

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Complainant, Josephine Knight, is to have the Custody and Control of the minor child, Janette Knight, with the right of the said Albert Junior Knight to visit said child at reasonable times.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said Albert Junior Knight is to execute a quitclaim deed to the homestead owned by the parties.

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 Albert Junior Knight the Respondent pay the cost herein to be taxed, for which execution may issue.

This 4th day of May, 1945

J. W. Hall
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

RECORDED

No. 12761 Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

JOSEPHINE KNIGHT

vs. Complainant

ALBERT JUNIOR KNIGHT

Respondent

DIVORCE DECREE

Filed this _____ day of _____

, 194_____

Register

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, that this agreement made and entered into by and between Josephine Knight, first party and Albert Junior Knight, second party, witnesseth:

WHEREAS, the parties hereto are husband and wife and have come to the conclusion that it is absolutely impossible for them to any longer live together; whereas, a suit is now pending in the Circuit Court of Baldwin County, Alabama, by the first party as Complainant against the second party as Respondent:

WHEREAS, the parties have reached a full and complete agreement as to support and custody of the child and payment of all costs.

1.

The first party is to have the custody, care and control of the one child, Janette Knight, aged about 15 months, with the right of the second party to visit her at reasonable times.

2.

The second party will convey to the first party by a quitclaim deed, their homestead consisting of about two acres of land but the party of the second part reserves the right to harvest the crop which he planted this spring.

IN WITNESS WHEREOF, the parties hereto have hereunto set their hands and seals on this the 17 day of April, 1945.

Josephine Knight (SEAL)
Albert Junior Knight
Albert J. Knight (SEAL)

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

* I, [Signature], a Notary Public in and for said County and in said State, hereby certify that Josephine Knight and Albert Junior Knight, whose names are signed to the foregoing agreement, and who are known to me, acknowledged before me on this day that, being informed of the contents of the agreement, they executed the same voluntarily on the day the same bears date.

Given under my hand this 17 day of April, 1945.

My commission expires:
My Commission Expires Sept. 10, 1947

[Signature]
Notary Public

STATE OF ALABAMA
BALDWIN COUNTY

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

WE COMMAND YOU, that you summon JOSEPHINE KNIGHT 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 A. J. KNIGHT, against the said Josephine Knight, 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 ___ day of February, 1945.

Register

A. J. KNIGHT)	
COMPLAINANT)	IN THE CIRCUIT COURT OF
)	
VS.)	BALDWIN COUNTY, ALABAMA
)	
JOSEPHINE KNIGHT)	IN EQUITY
RESPONDENT)	

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

Your Complainant, A. J. Knight, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent were married at Foley, Alabama, on September 1, 1937, and lived together as husband and wife until February 1, 1944;


3.

That on to-wit February 1, 1944, and at times prior thereto, the Respondent committed acts of adultery with one Allen Baldwin; that said acts of adultery were without the consent or approval of the Complainant, and that the Complainant has not condoned said acts;

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

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

EEEBE & HALL

By: 
Solicitors for the Complainant

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, that this agreement made and entered into by and between Josephine Knight, first party and Albert Junior Knight, second party, witnesseth:

WHEREAS, the parties hereto are husband and wife and have come to the conclusion that it is absolutely impossible for them to any longer live together; whereas, a suit is now pending in the Circuit Court of Baldwin County, Alabama, by the first party as Complainant against the second party as Respondent:

WHEREAS, the parties have reached a full and complete agreement as to support and custody of the child and payment of all costs.

1.

The first party is to have the custody, care and control of the one child, Janette Knight, aged about 15 months, with the right of the second party to visit her at reasonable times.

2.

The second party will convey to the first party by a quitclaim deed, their homestead consisting of about two acres of land but the party of the second part reserves the right to harvest the crop which he planted this spring.

IN WITNESS WHEREOF, the parties hereto have hereunto set their hands and seals on this the 17 day of April, 1945.

Josephine Knight (SEAL)
Albert Junior Knight (SEAL)

THE STATE OF ALABAMA,
BALDWIN COUNTY.

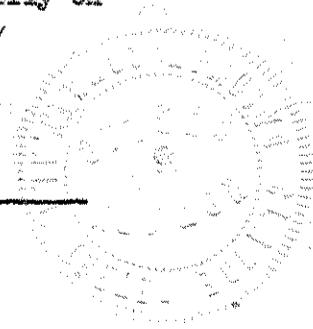
I, Paul J. [Signature], a Notary Public in and for said County and in said State, hereby certify that Josephine Knight and Albert Junior Knight, whose names are signed to the foregoing agreement, and who are known to me, acknowledged before me on this day that, being informed of the contents of the agreement, they executed the same voluntarily on the day the same bears date.

Given under my hand this 17 day of April, 1945.

My commission expires:

My Commission Expires Sept. 10, 1947

[Signature]
Notary Public



ALBERT TO MARY ANN
KNOX COUNTY

wherein she has demanded that I should return to her the sum of \$100.00 which she claims is due to her for the use of the property which she claims to have purchased from me.

It is my duty to advise you that I have no obligation to return to you the sum of \$100.00 which you claim is due to you for the use of the property which you claim to have purchased from me. I have no obligation to return to you the sum of \$100.00 which you claim is due to you for the use of the property which you claim to have purchased from me.

It is my duty to advise you that I have no obligation to return to you the sum of \$100.00 which you claim is due to you for the use of the property which you claim to have purchased from me. I have no obligation to return to you the sum of \$100.00 which you claim is due to you for the use of the property which you claim to have purchased from me.

AGREEMENT

JOSEPHINE KNIGHT,
Complainant
vs.
ALBERT JUNIOR KNIGHT,
Respondent

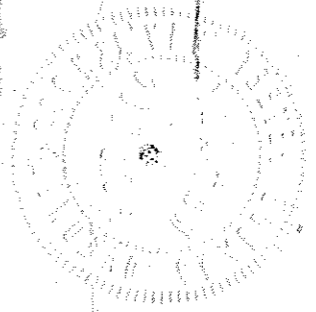
That the Respondent has agreed to pay to the Complainant the sum of \$100.00 which she claims is due to her for the use of the property which she claims to have purchased from me. I have no obligation to return to you the sum of \$100.00 which you claim is due to you for the use of the property which you claim to have purchased from me.

It is my duty to advise you that I have no obligation to return to you the sum of \$100.00 which you claim is due to you for the use of the property which you claim to have purchased from me. I have no obligation to return to you the sum of \$100.00 which you claim is due to you for the use of the property which you claim to have purchased from me.

(NAME) Albert Junior Knight
(NAME) Josephine Knight

ALBERT TO MARY ANN
KNOX COUNTY

I, the Respondent, do hereby certify that I have read the foregoing agreement and I agree to the same. I have no objection to the same being recorded in the public records of this county.



(Signature)
County Clerk

My Commission Expires Sept. 10, 1941

THE STATE OF ALABAMA,)
)
BALDWIN COUNTY.)

TO ANY SHERIFF OF THE STATE OF ALABAMA -- GREETING:

WE COMMAND YOU, that you summon Albert Junior Knight, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within thirty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by Josephine Knight, against the said Albert Junior Knight, 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 thereof.

WITNESS, R. S. Duck, Register of the Court, this 13 day of February, 1945.


Register

JOSEPHINE KNIGHT,)	
Complainant)	IN THE CIRCUIT COURT OF
)	
vs.)	BALDWIN COUNTY, ALABAMA
)	
ALBERT JUNIOR KNIGHT,)	IN EQUITY
Respondent)	

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

Your oratrix, Josephine Knight, a resident citizen of Baldwin County, Alabama, over the age of twenty-one years, respectfully shows unto your Honor that on or about August 21, 1937, oratrix intermarried with said Albert Junior Knight, at Foley, Alabama, and they lived together as man and wife until a few days ago, most of the time residing in Baldwin County, Alabama, and oratrix has been a bona fide resident citizen of Alabama for one year next preceding the filing of this bill.

2. Respondent since marriage with complainant, about the first week in October, 1943, committed adultery with one Lena Knight in the Town of Foley, Baldwin County, Alabama; and also, has committed actual violence upon the person of the complainant attended with danger to her life and health or from his conduct there is reasonable apprehension of such violence, for on numerous occasions the Respondent has violently twisted the arm of the complainant so that it was necessary, on one of such occasions to go to a doctor, thus putting her in constant apprehension of such violence.

3. That there was born to said marriage one child, Janette, aged 15 months; that said child is and has been with your complainant, who is a suitable, fit and proper person to have her care, maintenance and control; that the Respondent is an able bodied man, easily capable of maintaining and supporting the Complainant and the minor child.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Albert Junior Knight

Josephine Knight

VS.

Albert Junior Knight

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, _____
Oral Deposition of Josephine Knight and Willy Mae Shoots and Agreement

and in behalf of Defendant upon Answer and Agreement

Frederick H. Williams
Solicitor for Complainant

Robert _____ Register.

RECORDED

No. 1276A

The State of Alabama,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

~~JOSEPHINE KNIGHT~~

VS.

ALBERT JUNIOR KNIGHT

NOTE OF TESTIMONY

Filed in Open Court this 23
day of April 1945

[Signature]

Register.

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

KNOW ALL MEN BY THESE PRESENTS, that this agreement made and entered into by and between Josephine Knight, first party and Albert Junior Knight, second party, witnesseth:

WHEREAS, the parties hereto are husband and wife and have come to the conclusion that it is absolutely impossible for them to any longer live together; whereas, a suit is now pending in the Circuit Court of Baldwin County, Alabama, by the first party as Complainant against the second party as Respondent:

WHEREAS, the parties have reached a full and complete agreement as to support and custody of the child and payment of all costs.

1.

The first party is to have the custody, care and control of the one child, Janette Knight, aged about 15 months, with the right of the second party to visit her at reasonable times.

2.

The second party will convey to the first party by a quitclaim deed, their homestead consisting of about two acres of land but the party of the second part reserves the right to harvest the crop which he planted this spring.

IN WITNESS WHEREOF, the parties hereto have hereunto set their hands and seals on this the 17 day of April, 1945.

Josephine Knight (SEAL)

Albert Junior Knight (SEAL)

THE STATE OF ALABAMA,)
BALDWIN COUNTY.)

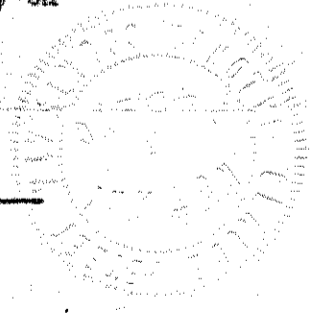
I, Paul J. [Signature], a Notary Public in and for said County and in said State, hereby certify that Josephine Knight and Albert Junior Knight, whose names are signed to the foregoing agreement, and who are known to me, acknowledged before me on this day that, being informed of the contents of the agreement, they executed the same voluntarily on the day the same bears date.

Given under my hand this 17 day of April, 1945.

My commission expires:

My Commission Expires Sept. 10, 1947

Paul J. [Signature]
Notary Public



THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Josephine Knight

Complainant

VS.

Albert Junior Knight

Respondent

I, Alica A. Christian

~~as Register and~~ Commissioner

have called and caused to come before me Josephine Knight and Willy Mae Shoots

witness^{es} named in the Requirement for Oral Examination, on the 10 day of February 194⁵, at the office of Forest A. Christian in Foley, Alabama, and having first sworn said Witness^{es} to speak the truth, the whole truth, and nothing but the truth, the said Josephine Knight and Willy Mae Shoots doth depose and say as follows:

My name is Josephine Knight, I am 22 years of age and married Albert on August 21, 1937, at Foley, Alabama. We have a baby girl about 15 months old. When I was carrying this baby, we were working on our house one Sunday so that the house would be ready for me when the baby came and that evening Albert went to see his mother and he didn't come back for a long time so I went to look for him. His car was parked at Uncle Jake's filling station west of Foley, and I figured he was in the filling station so I sat on the fender until the lights went out at the filling station, and then two brothers of Lena Knight (sister-in-law of Albert) came out of a house and the light in the house went out. I went upon the porch and saw my husband and Lena Knight in bed together. It was a bright moonlight night about eight o'clock in the early fall.

Also my husband has slapped me, slung me out of the car and twisted my arm so that I went to Dr. Stanley and he said that it was not broken but badly bruised.

My husband makes \$25.00 a week, working for Dick Childress in Foley, Alabama. We have an 18 ft. x 20 ft. house and two acres of ground, four miles west of Foley. I would like to have the Court give me this place because I have to have a place to keep the baby and it is easier for him to get a place. I paid \$120.00 on the land, I was working then at the Wee Bite Cafe and picked up potatoes. I had the money in the bank to pay this.

Josephine Knight

Josephine Knight

My name is Willy Mae Shoots, I am sister of the Complainant. I am 25 years old. I saw Albert beat Josephine once on the church grounds. He hit her and slapped her with his hand. He is a pretty mean person.

Willy Mae Shoots

Willy Mae Shoots

ORAL EXAMINATION.

I, Alica A. Christian, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition ~~is~~ 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 Forest A. Christian 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 10 day of February, 194⁵.

Alica A. Christian (L.S.)

NO. 1276A PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

JOSEPHINE KNIGHT
vs. ALBERT JUNIOR KNIGHT
Complainant

Respondent.

Oral Deposition

Filed 4-23, 194⁵
Forest A. Christian, Register.

Recorded in _____ Record

Vol. _____ Page _____, Register.

1276A

KNIGHT VS. KNIGHT

AMENDED BILL

Filed
1945
R. J. [unclear]
[unclear]

JOSEPHINE KNIGHT,
Complainant

vs.

ALBERT JUNIOR KNIGHT,
Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

AMENDED BILL OF COMPLAINT

Comes your oratrix and adopts the allegations and the prayer for relief set forth in the original Bill of Complaint.

Complainant further prays that she be awarded their house and two acres of land, located approximately four miles west of Foley, Alabama.

Forest A. Christian
Forest A. Christian, Foley, Alabama
Solicitor for the Complainant

Apply

FILED
APR 21 1914
BALDWIN COUNTY, ALABAMA

24-91-11

127QA

COMMISSIONERS OF THE LAND OFFICE
STATE OF NEW YORK
ALBANY

THE NEW YORK STATE COURTS
ALBANY

IN SENATE
JANUARY 19, 1945

REPORT OF THE COMMISSIONERS OF THE LAND OFFICE
ON THE PROCEEDINGS OF THE COMMISSIONERS OF THE LAND OFFICE
IN THE MATTER OF THE ESTATE OF JOHN J. KAY, DECEASED

AND THE PROCEEDINGS OF THE COMMISSIONERS OF THE LAND OFFICE
IN THE MATTER OF THE ESTATE OF JOHN J. KAY, DECEASED
AND THE PROCEEDINGS OF THE COMMISSIONERS OF THE LAND OFFICE
IN THE MATTER OF THE ESTATE OF JOHN J. KAY, DECEASED

KNIGHT VS. KNIGHT

AMENDED BILL

[Handwritten signature]
Commissioner of the Land Office

2-19-45

1276
No. 1276

KNIGHT VS. KNIGHT

SECOND AMENDMENT TO BILL OF COMPLAINT

For March 26 1945
R. S. Kelly
Clerk