THE STATE OF ALABAMA, BALDWIN COUNTY

	ELAINE LACOSTE	Complainant
	VS.	
	GEORGE H. LACOSTE	Respondent
This cause coming on to	be heard was submitted upon Bill of Comp	plaint, Decrease
	the Respondent and Testimony as noted tis of the opinion that the Complainant is	
It is therefore ordered, a	adjudged and decreed by the Court that the	bonds of matrimony here
fore existing between the Co	omplainant and Defendant be, and the s	ame are hereby, dissolved
nd that the said	e LaCoste	
forever divorced from the sa	aid George H. LaCoste	
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cept to each other until sixty xty days, neither party shall : It is further ordered that again contract marriage upon	judged and decreed that neither party to a days after the rendition of this decree, and again marry except to each other during the the Complainant and Respondent be, and in the payment of the cost of this suit. Elaine LaCoste	that if appeal is taken within pendency of said appeal.
It is further ordered that again contract marriage upon It is further ordered that	y days after the rendition of this decree, and again marry except to each other during the the Complainant and Respondent be, and a the payment of the cost of this suit.	that if appeal is taken withit pendency of said appeal. they are hereby permitted
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It is further ordered that again contract marriage upon It is further ordered that again contract marriage upon It is further ordered that e Complainant	court of Baldwin County, Alabama, do foregoing is a correct copy of the decree cach of the origin.	that if appeal is taken within the pendency of said appeal. they are hereby permitted they are hereby permitted they are hereby permitted they are hereby issue. Circuit Court, in Equity the circuit court, the circuit court that the permitted they are hereby certify they are hereby certifications.
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ELAINE LACOSTE COMPLAINANT

VS.

GEORGE H. LACOSTE RESPONDENT

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY

And now comes the Respondent and accepts servive of summons and complaint in this cause.

The Respondent admits the allegations as to marriage, resident, and child, however, denies all other allegations contained in the bill and complaint and demands strict proof of the same.

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

WITNESS:

1278

ELAINE LACOSTE COMPLAINANT

vs.

GEORGE H. LACOSTE RESPONDENT

ANSWER AND WAIVER

Jalus del 141945

STATE OF ALABAMA BALDWIN COUNTY

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

WE COMMAND YOU that you summon GEORGE H. LACOSTE 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 Elaine LaCoste, against the said George H. LaCoste, and further to do and ferform 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 $\frac{14}{4}$ day of February, 1945.

Register

ELAINE LACOSTE COMPLAINANT

GEORGE H. LACOSTE RESPONDENT

VS.

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:

Your Complainant, Elaine LaCoste, respectfully represents and shows unto your Honor and this Honorable Court as follows:

7.

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 Bay
Minette, Alabama, on October 14, 1940, and lived together as husband and wife
in Baldwin County, Alabama, until February 11, 1945;

3.

That on to-wit February 11, 1945, and at various times prior thereto, the Respondent cursed, threatened and abused the Complainant and often threat-ened to do 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, complainant prays that your Honor will by proper process, make the said George H. LaCoste 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.

Complainant further prays that your Honor will, upon the hearing hereof, enter an order and decree granting to the Complainant an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; and that your Honor 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

Solicitors for the Complement

ELAINE LACOSTE COMPLAINANT

VS.

GEORGE H. LACOSTE RESPONDENT

SUMMONS AND COMPLAINT

Republication

THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

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	V	rs.		
	GEORGE H	LACOSTE	Respondent	
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			on the 12thday of February	
1945, at the office of			n said Witnessto speak t	•

TIAINT IACOSTE

My name is Elaine LaCoste. I am a bona fide resident of 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 Baldwin County, Alabama.

The Respondent and I married at Bay Minette, in Baldwin County, Alabama, on October 14, 1940. We lived together as husband and wife in Baldwin County, Alabama, until February 11, 1945.

The Respondent and I have had trouble from time to tome and he has often threatened, cursed and abused me. The conditions have grown to the point that it is now absolutely impossible for us to live together as husband and wife. The conduct of the Respondent is 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 violence to my person which would necessarily endanger my life and health.

The Respondent and I have reached a full, complete and perfect agreement as to all property owned by us.

We have one child, George Henry LaCoste, now 22 months old. The Respondent and I have reached an agreement that he is to have the care, custody and control of child and it is understood that he will maintain and suport him and that I shall from time to time have the right to visit him, or, to have the child visit me.

Mrs Elim Sa Poste

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 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 12th day of February, 194 5
Lillian Patterson (10)
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THE STATE OF ALABAMA, Baldwin County

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ELAINE LACOSTE	
COMPLAINANT	THE STATE OF ALABAMA
	Baldwin County
Vs.	Bana Will Oblasty
	IN EQUITY
GEORGE H. LACOSTE	Circuit Court of Baldwin County
RESPONDENT	Circuit Court of Baldwin County
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	Redion
	Register.

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MOORE PRINTING CO., BAY MINETTE, ALA.