

(1278)

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

ELAINE LACOSTE Complainant

VS.

GEORGE H. LACOSTE Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~DECREES FOR COSTS~~

on Answer and 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 heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,

and that the said Elaine LaCoste

is forever divorced from the said George H. LaCoste

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 Elaine LaCoste

the Complainant pay the cost herein to be taxed, for which execution may issue.

This 15th day of Feb, 1940

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

No. 1278 Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

vs. Complainant

Respondent

DIVORCE DECREE

Filed this _____ day of

_____, 194

Register

ELAINE LACOSTE
COMPLAINANT

VS.

GEORGE H. LACOSTE
RESPONDENT

ANSWER AND WAIVER

Filed Feb 14 1945
R. L. Welch
Ry

[Faint handwritten signature]

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 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 14 day of February, 1945.


Register

ELAINE LACOSTE
COMPLAINANT

VS.

GEORGE H. LACOSTE
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;

Your Complainant, Elaine LaCoste, 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 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 threatened 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

By: 
Solicitors for the Complainant

1375

ELAINE LACOSTE
COMPLAINANT

VS.

GEORGE H. LACOSTE
RESPONDENT

SUMMONS AND COMPLAINT

Filed Feb 17 1945
R. J. [Signature]
Reyer

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

ELAINE LACOSTE Complainant

VS.

GEORGE H. LACOSTE Respondent

I, Lillian Patterson

as Register and Commissioner

have called and caused to come before me Elaine LaCoste

witness named in the Requirement for Oral Examination, on the 12th day of February 1945, at the office of Beebe & 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 Elaine LaCoste doth depose and say as follows:

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 time 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 support him and that I shall from time to time have the right to visit him, or, to have the child visit me.

Elaine LaCoste

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—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, 1945.

Lillian Patterson (L. S.)

NO. 1298 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed 2-14, 1945

[Signature], Register.

Recorded in

Record

Vol. _____

Page _____

, 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 Elaine LaCoste

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Elaine LaCoste

Complainant
and George H. LaCoste

Defendant,

on oath to be by you administered, upon Elaine LaCoste

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

Witness 14 day of Feb, 1945.

[Handwritten Signature]

REGISTER

Commissioner's Fee \$ _____

Witness' Fees, \$ _____

NO.

1278

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Complainant

VS.

Defendant

Commission To Take Deposition

COMMISSIONER:

Witnesses:

ELAINE LACOSTE

COMPLAINANT

VS.

GEORGE H. LACOSTE

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 and testimony of Elaine LaCoste.

and in behalf of Defendant upon _____

R. DeLoach

Register.

No. 1278

The State of Alabama
BALDWIN COUNTY
IN EQUITY
Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this 14
day of July 1945

Robert

REGISTER