

(316)

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

EDITH A. TAYLOR, Complainant  
VS.

WILLIAM O. TAYLOR, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso

~~or~~ 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 EDITH A. TAYLOR is forever divorced from the said WILLIAM O. TAYLOR

for and on account of CRUELTY.

IT IS FURTHER ORDERED AND DECREED that in lieu of all other alimony Respondent shall pay to Complainant the sum of FIVE HUNDRED DOLLARS, Two Hundred Dollars of which are to be paid within five days from the date of this decree and the balance of Three Hundred Dollars within ninety days thereafter.

The Court will retain control of this cause until the full amount of Five Hundred Dollars is paid.

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 William O. Taylor, the Respondent, pay the cost herein to be taxed, for which execution may issue.

This 12<sup>th</sup> day of September, 1945.

G. M. Hase  
Judge Circuit Court, in Equity.

I, Robert S. Duck, Register of the Circuit

~~10-9-45~~ 10-9-45

Complainant's Solicitor Reports Decree Satisfied in full

R.S. Duck  
Register

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 September, 1945.

Register of Circuit Court, in Equity

No. \_\_\_\_\_ Page \_\_\_\_\_

**The State of Alabama**  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EDITH A. TAYLOR,

vs. Complainant

WILLIAM O. TAYLOR,

Respondent

**DIVORCE DECREE**

Filed this \_\_\_\_\_ day of

September, 1945.

Register

Edith A. Taylor

VS.

William O Taylor

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, \_\_\_\_\_

~~and~~ Answer and waiver Testimony of Complainant

and in behalf of Defendant upon \_\_\_\_\_

E. G. Rickarby  
Solicitor for Complainant

*R. Rickarby*  
Register.

No. 1316

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Edith A. Taylor

VS.

William O. Taylor

NOTE OF TESTIMONY

Filed in Open Court this 8th  
day of Sept. 194 5



Register.

CIRCUIT COURT OF BALDWIN COUNTY

EQUITY SIDE.

TO

WILLIAM O. TAYLOR

You are hereby notified to appear and plead, answer or demur, within thirty days from the receipt hereof, to the Bill of Complainat filed in this Court at Bay Minette, Alabama, against you as Defendant by EDITH A. TAYLOR, Complainant.

Witness my hand this the

day of April, 1945.

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Register, Circuit Court

TO THE

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

Comes EDITH A. TAYLOR, and by this her Bill of Complaint,  
presented against WILLIAM O. TAYLOR, respectfully shows:

FIRST: That Complainant and Defendant are both over the  
age of twenty-one years; that she has been for more than five  
years a resident of the State of Alabama, formerly in Baldwin  
County but later removed to Mobile because of the nature of her  
employment where she now sojourns.

SECOND: That Complainant and Defendant were married in the  
City of Mobile, on December 23, 1943 and lived together as husband  
and wife until September 29, 1944, when they parted as hereinafter  
stated, since which date they have not lived together or resumed  
marital relations of any kind.

THIRD: That after said marriage, Complainant learned that  
Defendant, who was away from home a considerable portion of his  
time on business trips, had been involved in a serious matter in  
the State of Texas, and when on or about September 29, 1944 Defendant  
learned of her knowledge of this, he became greatly enraged and  
threatened the life of Complainant in such a serious manner that  
she escaped from his presence and has since then lived separate  
and apart from Defendant. Complainant further charges that because  
of what she has learned of Defendant's criminal record and because  
of his attitude and obvious hostility toward her, she has reasonable  
cause to fear that should she continue to live with Defendant, it  
would be at very great risk and danger to her life.

THE PREMISES CONSIDERED, Complainant prays that WILLIAM O.  
TAYLOR be made party defendant to this cause, being, at present,  
a non-resident of the State of Alabama, personal service cannot be  
had upon him, wherefore she prays that he be notified by registered  
of the pendency of this cause and required to answer same within the  
time prescribed by Law.

Complainant further prays that upon hearing of this cause, a decree be rendered forever divorcing her from the said WILLIAM O. TAYLOR, granting her the right to marry again should she so desire; a suitable and proper allowance for payment of the fee of her solicitor in this cause and a further allowance out of the estate of Defendant for her maintenance and support; also such other, further or different relief as to equity may seem meet.

*Elliott G. Rickarby*  
Solicitor for Complainant

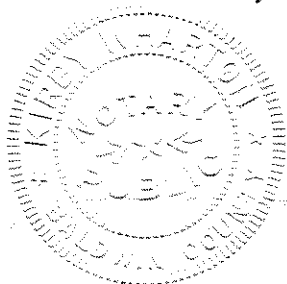
STATE OF ALABAMA

BALDWIN COUNTY

Before me, the undersigned Notary, personally appeared ELLIOTT G. RICKARBY, who, being sworn, says that he is reliably informed, and upon such information states that WILLIAM O. TAYLOR, the Defendant above named, is a non-resident of the State of Alabama, now traveling through the State of Texas, where his address is P. O. Box 104, Houston, Texas; that he is over the age of twenty-one years and that notice by registered mail is necessary to obtain legal service upon him.

*Elliott G. Rickarby*

Subscribed and sworn to before me this the 30th day of March, 1945.



*Elliott G. Rickarby*  
Notary Public, Baldwin County, Alabama.

My Commission Expires  
February 13, 1946

EDITH A. TAYLOR,  
Complainant,

E Q U I T Y .

vs

CIRCUIT COURT OF  
BALDWIN COUNTY,  
ALABAMA.

WILLIAM O. TAYLOR,  
Respondent.

DEPOSITION OF EDITH A. TAYLOR , WITNESS FOR COMPLAINANT.

The said witness, being first duly sworn, upon examination by the Solicitor for the Complainant, testified as follows:

I am the Complainant in this cause and am a resident of the State of Alabama for the past five years. He and I are both over the age of twenty-one years and were married in the City of Mobile on December 23rd, 1943. We lived together in Mobile until September 29th when we parted and have lived apart ever since.

Some time after our marriage, I learned that my husband, who was away from home a considerable portion of his time on business trips, had become involved before our marriage in a serious trouble in the State of Texas. When I told him what I had learned on September 29th of last year, he became greatly enraged and accused me of conspiring against him, threatening my life and acting in such a violent manner that I feared for my life, and escaping from his presence have lived apart from him since. From what I have learned of his past record and because of his actions and threats I feel that it would be dangerous for me to go back to live with him and know that his attitude toward me has completely changed so that I have just grounds for my apprehensions.

Respondent when I last heard from him was in Texas and I do not want to ever see him again.

*Edith Annette Taylor*

I, Helen P. Baugh, acting as commissioner by agreement of parties hereby certify that in the case of EDITH ANNETTE TAYLOR, Complainant, vs. WILLIAM O. TAYLOR, Respondent, pending on the Equity Side of the Circuit Court of Baldwin County, I caused EDITH ANNETTE TAYLOR , witness for the Complainant, to appear before me, on August 23rd, in the office of Complainant's solicitor, in Fairhope, Alabama, where, after being duly sworn, upon examination by the Solicitor for the Complainant, she testified (as is herein set out and her testimony after being reduced to writing was read over and signed by her.

I further certify that I am neither of counsel nor of kin to either party to the cause or in anywise interested in the result thereof.

In witness whereof, I hereto set my hand and seal as commissioner this 6th day of September, 1945.

*Helen P. Baugh*  
Commissioner



Taylor  
AS

Taylor

History

Julian Kapt 8-1945  
P. Jackson  
Kapt 8

*[Faint, illegible text, possibly bleed-through from the reverse side of the page]*

LAW OFFICES  
ELLIOTT G. RICKARBY  
FAIRHOPE, ALABAMA  
September 6, 1945

Honorable F.W. Hare  
Judge  
Monroeville, Alabama

Dear Judge:

TAYLOR vs TAYLOR: With this you will receive the submission in this cause and as there is no supporting evidence of Complainants testimony, I feel that an explanation will help the matter, which is, as you see, uncontested.

Mrs. Taylor was the widow of a West Indian Shipmaster, mother of two fine sons, who after several years, married a man of attractive appearance and personality, without looking into his background. His business took him away from home much of the time and in the early part of this year, she discovered, not only that he was untrue to her but that he had a criminal record and was out of prison on parole. When he found that she knew this, he showed his true colors and threatened her with death in a manner that terrified her greatly. She came at once to me, I took the matter up with the Defendant who was perfectly willing for her to have her freedom and after some discussion, signed an agreement for the payment of alimony. This was to be strung out over a considerable period of time, to which Mrs. Taylor objected. After further negotiation, through a third party, it was arranged on a basis of a cash settlement of \$500.00, \$200.00 on rendition of decree, the remainder in ninety days. In consideration of this, we agreed to make no unnecessary publicity of Defendant's record but from the nature of the case no one but Complainant knows of the threats. With this explanation I submit, you will be justified in granting the decree. I enclose the first agreement as to alimony signed by defendant that you may see that the verbal one embodied in the decree is more favorable to Defendant. Please return this to the file.

Very truly yours,

*Elliott G. Rickarby*

EGR: CSM  
2144

EDITH A. TAYLOR,  
Complainant

E Q U I T Y

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

vs.

WILLIAM O. TAYLOR,  
Respondent

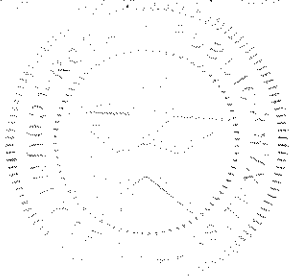
Comes WILLIAM O. TAYLOR, Respondent in the above styled cause, and his answer to the Bill of Complaint says he denies each and every allegation of same.

Respondent hereby waives notice of demand for oral examination of Complainant's witnesses; of the issue of commission to take testimony; of the time and place set for taking same and of the right to introduce evidence in his own behalf. He further agrees that this cause may be submitted for final decree at any time on the pleading and Complainant's evidence as noted by the Register.

William O. Taylor  
Respondent

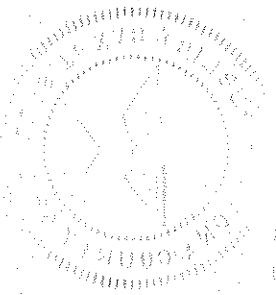
Before me the undersigned Notary personally appeared WILLIAM O. TAYLOR, who is known to me to be the Respondent above named and who acknowledged that he executed the foregoing answer voluntarily with knowledge of its contents.

Witness my hand and official seal this the 10th day of April  
~~March~~, 1945.



Iva Joe Reed (Iva Joe Reed)

Notary Public, Dallas County, Texas.



WILLIAM O. TAYLOR, Plaintiff  
vs.  
EDITH A. TAYLOR, Defendant

(Best not signed by Edith)

EDITH A. TAYLOR, Defendant, by and through her undersigned counsel, moves for summary judgment on the following grounds:

1. That the Plaintiff has failed to establish that she is entitled to a divorce from the Defendant under the laws of the District of Columbia.

*Edith A. Taylor*  
Defendant

2. That the Defendant has failed to establish that she is entitled to a divorce from the Plaintiff under the laws of the District of Columbia.

3. That the Defendant has failed to establish that she is entitled to a divorce from the Plaintiff under the laws of the District of Columbia.

1816  
EDITH A. TAYLOR,  
Complainant

vs.  
WILLIAM O. TAYLOR,  
Respondent

ANSWER AND WAIVER

*William O. Taylor*  
Plaintiff

131948

WILLIAM O. TAYLOR, Plaintiff

AMANDA WOODS, Attorney  
for Edith A. Taylor

EDITH A. TAYLOR, Defendant

WITNESSES

EDITH A. TAYLOR,  
Complainant

E Q U I T Y

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

vs.

WILLIAM O. TAYLOR,  
Respondent

IT IS AGREED between the parties to this cause that in lieu of alimony the following shall be embodied in the decree of divorce should one be granted:

FIRST: Respondent is to pay for twenty-four months, commencing on the first day of the month following the date of the decree, the sum of \$50.00 per month, payable to Complainant at her residence in Mobile, Alabama.

SECOND: Respondent is to pay forthwith \$50.00 as Complainant's solicitor's fee for the prosecution of this divorce and shall further pay the Court costs of the proceeding not exceeding \$17.50.

THIRD: That this Court shall retain control of this cause until all payments here provided have been made in full.

Executed in duplicate by Complainant on the            day of April, 1945 and by Respondent on the 10<sup>th</sup> day of April 1945.

William O. Taylor

Executed by Edith A. Taylor,  
Complainant, in the presence of:

Executed by William O. Taylor,  
Respondent, in the presence of:

J. J. Reed

LAW OFFICES  
ELLIOTT G. RICKARBY  
FAIRHOPE, ALABAMA  
November 8, 1945

Mr. R.S. Duck  
Register  
Bay Minette, Alabama

Dear Bob:

TAYLOR vs TAYLOR: 1316: It gives me pleasure to say that this matter is now finally settled by the payment in full of the alimony provided by the decree. The costs as you know, were paid last April.

I suggest that you endorse on the margin of the decree: "10-9-45 Complainant's solicitor reports <sup>decree</sup> ~~this~~ satisfied in full."

That <sup>is</sup> for telephoning my office yesterday about the adjournment <sup>of</sup> ~~for~~ court.

Sincerely,

*E. G. R.*

*My able secretary was ill yesterday and is still weak and nervous as shown by the above.*

EGR:esm  
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