

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

LEONA KYLES,

Complainant

VS.

PETE KYLES,

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree, Prox Confessor~~

~~an~~ 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 LEONA KYLES

is forever divorced from the said PETE KYLES

for and on account of Adultery.

IT IS FURTHER ORDERED AND DECREED that the Complainant retain the sole custody of Pete Kyles, the infant son of the parties, subject to the right of Respondent to visit said child as often as twice a month during reasonable daylight hours.

IT IS FURTHER ORDERED AND DECREED that in lieu of alimony Respondent pay to Complainant for the support of said Pete Kyles, Jr., the sum of FIVE DOLLARS per week, beginning January 28th, 1946 and continuing until said child attain the age of sixteen years. Such payments to be contingent on said son continuing to live with and be dependent upon Complainant.

The Court will retain control of this cause for such further orders as from time to time become proper.

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 Pete Kyles, the Respondent pay the cost herein to be taxed, for which execution may issue.

This 3rd day of April, 1945.

*F. W. Hare*

Judge Circuit Court, in Equity.

I, Robert S. Duck, 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 April, 1945.

Register of Circuit Court, in Equity

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

**The State of Alabama**  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

LEONA KYLES,

vs. Complainant

PETE KYLES,

Respondent

**DIVORCE DECREE**

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

April, 1945

Register

Leona Kyles

vs.

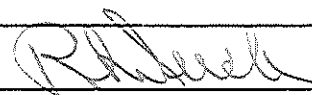
Pete Kyles

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint,  
and Testimony of Complainant and  
Certificate of the Clerk of the County Court

and in behalf of Defendant upon Answer and waiver



Register.

No. 1823

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

Leona Kyles

vs.

Peter Kyles

**NOTE OF TESTIMONY**

Filed in Open Court this 23rd

day of April, 1945

*[Handwritten Signature]*

Register.

Printed by The Baldwin Times, Bay Minette.

TO THE

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

Comes LEONA KYLES, and by this her Bill of Complaint,  
presented against PETE KYLES, respectfully shows:

FIRST: That Complainant and Defendant are both over the  
age of twenty-one years; that both have been for more than  
five years bona fide residents of Baldwin County, Alabama, though  
she has in the last few months removed to Pensacola, Florida.

SECOND: That Complainant and Defendant were married in the  
summer of 1939 and lived together as husband and wife up to about  
six months ago when she left him and went to Pensacola with their  
three year old child, Pete Kyles, Jr., where she now lives.

THIRD: That Complainant had for some time before their part-  
ing suspected him of improper relations with other women, but had  
no proof until February last when he and another woman were arrested  
when they were discovered together in a room in Foley and later  
both were convicted of adultery.

THE PREMISES CONSIDERED, Complainant prays that Pete Kyles  
be made party defendant to this cause, and by proper process be  
required to answer this Bill within the time prescribed by Law.

Complainant further prays that upon the hearing of this cause  
a decree be rendered forever divorcing her from said Pete Kyles;  
granting her the custody of the child; the right to marry again  
should she so desire, and to have such other, further or different  
relief as to equity may seem meet.

*Bevin A. Rice*

Solicitor for Complainant

OFFICE OF THE DISTRICT ATTORNEY

*[Signature]*

LEONA KYLES, Complainant

vs

PETE KYLES, Defendant

BILL OF COMPLAINT

LEONA KYLES, Complainant

vs

PETE KYLES, Defendant

BILL OF COMPLAINT

LEONA KYLES, Complainant

vs

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LEONA KYLES, Complainant

vs

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LEONA KYLES, Complainant

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LEONA KYLES, Complainant

vs

PETE KYLES, Defendant

BILL OF COMPLAINT

LEONA KYLES, Complainant

vs

PETE KYLES, Defendant

BILL OF COMPLAINT

182

10 1945

LEONA KYLES,  
Complainant,

E Q U I T Y .

vs

CIRCUIT COURT OF

PETE KYLES,  
Respondent.

BALDWIN COUNTY,  
ALABAMA.

DEPOSITION OF LEONA KYLES, witness for Complainant.

The above named witness, being first duly sworn, upon examination by Complainant, testified as follows:

I am the Complainant in this cause. I was married to Pete Kyles in the summer of 1939 and we lived together until the summer of 1944 when we parted. He is now living in Foley and I in Pensacola. We are both over the age of twenty-one years and native born citizens of Alabama. We have one child, a son three years of age who is with me now.

For some time past I have suspected my husband of having improper relations with other women. But have had no positive proof of this until recently when he was arrested in Foley for being in the house with another woman and both fined for living in adultery. I do not know of this of my own knowledge, but have witnesses who will testify that he has been untrue to me. I now want to be free from him.

*Leona Kyles.*

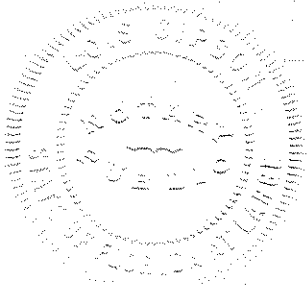
I, the undersigned, acting as Commissioner by agreement of parties, hereby certify that in the case of Leona Kyles, Complainant against Pete Kyles, Respondent, pending on the Equity Side of the Circuit Court of Baldwin County, Alabama, I caused Leona Kyles, a witness for Complainant, to appear before me in the City of Pensacola, Florida, where, after being duly sworn, she testified as is above set forth and her testimony, after being reduced to writing, was read over and signed by her in my presence.

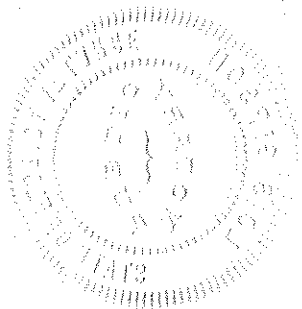
I further certify that I am neither of counsel or of kin to either party to this cause or in anywise interested in the result thereof.

IN WITNESS WHEREOF, I hereto set my hand and seal as Commissioner on this the 19<sup>th</sup> day of April, 1945.

*L. C. Gibson.*  
Commissioner.

Notary Public, State of Florida at Large.  
My commission expires March 22, 1949.  
Bonded by American Surety Co. of N. Y.





STATE OF TENNESSEE, County of \_\_\_\_\_, do hereby certify that the within and foregoing is a true and correct copy of the original as the same appears in the files of the \_\_\_\_\_.

LEONA KYLES, Complainant, vs. PETE KYLES, Respondent. I, the undersigned, being a duly qualified and sworn juror in the County of \_\_\_\_\_, State of Tennessee, do hereby depose and say that the within and foregoing is a true and correct copy of the original as the same appears in the files of the \_\_\_\_\_.

*Handwritten signature*

*James P. [unclear]*  
4-20-1945

DEPOSITION OF LEONA KYLES, Witness for Complainant.

LEONA KYLES, Complainant, vs. PETE KYLES, Respondent.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 1945.

AD

STATE OF TENNESSEE

1945



LEONA KYLES,  
Complainant,

vs

PETE KYLES,  
Respondent.

E Q U I T Y

Circuit Court of

Baldwin County, Alabama.

DEPOSITION OF JOHN DAVIS AND B. D. COBB, WITNESSES FOR  
COMPLAINANT.

The above named witnesses, being first duly sworn, upon examination by the Solicitor for the Complainant, testified as follows:

JOHN DAVIS.

I am a Deputy Sheriff of Baldwin County, residing in Foley. I know Pete Kyles and know that one night in the early part of this year, the exact date I do not now recall, with a warrant sworn out against him, B.D. Cobb, Town Marshal of Foley and I went to a negro house in Foley and there we found Pete Kyles and a woman, not his wife alone together in a room. We arrested them both on the charge of living in adultery and they were taken to the County Court in Bay Minette where they pleaded guilty and the charge was reduced to "Vagrancy" and they paid the fine. They made no denial that they were committing adultery and from the way we found them, there was no question of what they were doing or what they were there for.

*John Davis* . . . .

B. D. COBB.

I am a Police office for the Town of Foley. I was with Mr Davis when we went to arrest Pete Kyles on a charge of living in adultery one night in the early Spring. We found the pair of them, Pete and a young negro woman, not his wife, together in a room. There was no doubt about what they were there for and they did not deny having committed adultery. When they were tried in Bay Minette, by agreement the charged was reduced to Vagrancy and they pleaded guilty. While I did not see them in the act I have no hesitation in saying that he was guilty of adultery with this girl.

*B.D. Cobb* . . . .

I, the undersigned, acting by agreement of the parties as Commissioner, hereby certify that in the case of Leona Kyles, Complainant vs Pete Kyles, Respondent, pending on the Equity Side of the Circuit Court of Baldwin County, I caused John Davis and B.D. Cobb, witnesses for Complainant, to appear before me in the Town of Foley where, after being duly sworn, they testified as is above set forth and their testimony, after being reduced to writing, was read over and signed by them in my presence.

I further certify that I am neither of counsel or of kin to either party or in anywise interested in the result of this cause.

IN WITNESS WHEREOF, I hereto set my hand and seal as Commissioner on this the 27th day of April, 1945.

*W. G. [Signature]*  
Commissioner

*Handwritten notes at top left, partially illegible.*

STANDARD OF LIVES AND DEEDS...  
...of the 30 to 40 percent of cases...  
...of the 30 to 40 percent of cases...  
...of the 30 to 40 percent of cases...

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REC. C. B.

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...of the 30 to 40 percent of cases...  
...of the 30 to 40 percent of cases...  
...of the 30 to 40 percent of cases...

*Handwritten signature: R. Deane*

*Handwritten signature: Leathery*

*Handwritten signature: Ryles*

REC. C. B.

...of the 30 to 40 percent of cases...  
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LEONA KYLES,  
Complainant.

E Q U I T Y

vs

CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

PETE KYLES,  
Respondent.

Come PETE KYLES, Respondent in the above styled cause and for answer to the Bill of Complaint denies each material allegation of same.

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

*Pete P. Kyles* . . . . .  
Respondent.

BEFORE ME, the undersigned Notary, personally appeared Pete Kyles, who is known to me to be the Respondent in the above styled cause, who acknowledged that he executed the foregoing answer voluntarily with knowledge of its contents.

WITNESS my hand and official seal this the 16 day of April 1945.

*Charles J. Elbert*  
Notary Public, Baldwin County, Alabama.



STATE OF CALIFORNIA, DEPARTMENT OF INDUSTRIAL RELATIONS  
OFFICE OF THE ATTORNEY GENERAL  
SAN FRANCISCO, CALIFORNIA

LEONA KYLES, Complainant  
vs  
PETE KYLES, Respondent  
ANSWER AND WAIVER

*[Handwritten signature]*

1823  
LEONA KYLES,  
Complainant

vs  
PETE KYLES,  
Respondent

ANSWER AND WAIVER

*[Handwritten signature]*  
July 4, 1945

STATE OF CALIFORNIA  
DEPARTMENT OF INDUSTRIAL RELATIONS  
OFFICE OF THE ATTORNEY GENERAL  
SAN FRANCISCO, CALIFORNIA

STATE OF CALIFORNIA, DEPARTMENT OF INDUSTRIAL RELATIONS  
OFFICE OF THE ATTORNEY GENERAL  
SAN FRANCISCO, CALIFORNIA

FILED

R. S. DUCK

Register and  
Clerk

Of The  
Circuit Court




**BALDWIN COUNTY**

BAY MINETTE, ALA.

April 23rd 1945

I, R S. Duck Clerk, of the County Court ~~XXX~~ of Baldwin County, hereby certify the Peter Kyles was arrested On the 23rd day of January 1945 Charged with living in adultry with one May Bessie Lee.

Given under my Hand this 23rd day of April. 1945

  
R S Duck  
Clerk.

R. S. DICK

OF THE  
COUNTY OF

CLERK

**RETURN OF ELECTIONS**

APRIL 22ND 1928

ORDERED BY THE COURT THAT THE ELECTIONS BE HELD ON APRIL 22ND 1928 AT THE COURT HOUSE IN THE CITY OF ALBANY, NEW YORK.

1523

APRIL 22ND 1928

*[Handwritten signature]*  
R. S. DICK  
CLERK