

(1371)

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

Minnie Ruth Greer

Complainant

VS.

Mace Richard Greer

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on answer of Defendant 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 Minnie Ruth Greer

is forever divorced from the said Mace Richard Greer

for and on account of cruelty

It is further ordered, judged and decreed that the Defendant have the custody and control of their minor child, Mace Richard Greer, Jr.

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

This 24 day of September, 1945

J. W. Hare

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. _____ Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

vs. Complainant

Respondent

DIVORCE DECREE

Filed this _____ day of

_____, 194

Register

MINNIE RUTH GREER,
COMPLAINANT,
VS.
MACE RICHARD GREER,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 1371.

STIPULATION

IT IS STIPULATED AND AGREED by and between the parties to this cause acting through their respective solicitors as follows:

1. In the event a Decree of Divorce is rendered in this cause the custody and control of the said child shall be granted to the said Respondent.
2. That the Respondent pay to the Complainant as alimony and for a quit claim deed to property owned by them jointly, in Bay Minette, the sum of \$500.00.

Dickie O'Hall
W. W. Beeler
Solicitor for Complainant.

J. B. Blackburn
Solicitor for Respondent.

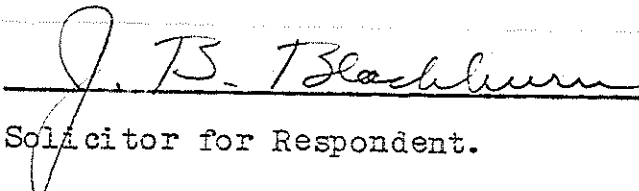
MINNIE RUTH GREER,
Complainant,
VS.
MACE RICHARD GREER,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY.
No. 1371.

ANSWER

Now comes the Respondent, Mace Richard Greer, and for answer to the Bill of Complaint filed in this cause consents and agrees that a Commissioner be appointed, testimony taken and this cause submitted for Final Decree without notice to him, all of which is hereby expressly waived.

Respondent denies each and all of the other allegations of the Bill of Complaint and demands strict proof of same.


Solicitor for Respondent.

RECORDED

ANSWER

MINNIE RUTH GREER,

Complainant,

VS.

MACE RICHARD GREER,

Respondent.

RECORDED

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY. NUMBER 1371.

Filed Sept 22 1945
R. J. [unclear]
[unclear]

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Minnie Ruth Greer Complainant

VS.
Mace Richard Greer Respondent

I, Eloise Roberry

as Register and Commissioner

have called and caused to come before me Minnie Ruth Greer
Mellie Henry

witness es named in the Requirement for Oral Examination, on the 27 day of Sept
1945, at the office of Berbe Hall
in Bay Minette, Alabama, and having first sworn said Witness es to speak the
truth, the whole truth, and nothing but the truth, the said Minnie Ruth
Greer doth depose and say as follows:

My name is Minnie Ruth Greer, I am complainant in the cause of Minnie Ruth Greer against Mace Richard Greer in the Circuit Court of Baldwin County, Alabama, in equity. We are both over the age of 21 years and reside at Bay Minette in Baldwin County where where we have lived for 4 years next caustinuously. We were married in 1939 at Uriah, Alabama. Defendant is a man violent and ungovernoble temper and drinks to excess. He has frequently beat me unmercifully. We separated June 4, 1945 at Bay Minette. He cursed and abused, beat me and droye me away from home on that day and threatened to shoot me. He stood at the door with a gun and told me he would kill me if I came back. I did not give any cause for his conduct.

Minnie Ruth Greer
The said Mellie Henry doth depose and

say:
My name is Mellie Henry. I am the mother of Minnie Ruth Greer. On June 4th, 1945 he beat her and drew a gun on her and told her he would kill her if she came back. He has beat her lots of times and cursed her for all kinds of vile and indecent names. He gets drunk frequently and when drunk or sober is a dangerous man.

Mellie Henry
her
Mellie Henry
Mark of

ORAL EXAMINATION.

I, Eloise Rasberry, 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 es and read over to them and they signed the same in the presence of myself and W.C. Beebe

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 22 day of Sept, 1945.

Eloise Rasberry (L. S.)

NO. 374 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

them
vs. Complainant

them
Respondent.

Oral Deposition

Filed Sept 24, 1945

es, Register.
Recorded in _____

Record _____

Vol. _____ Page _____, Register.

THE STATE OF ALABAMA, }
BALDWIN COUNTY

Circuit Court

To _____

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 Minnie Ruth Greer and Minnie Henry

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Minnie Ruth Greer

_____ Complainant
and Mace Richard Greer

_____ Respondent
on oath, to be by you administered, upon them
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 22nd day of Sept., 1945

[Handwritten Signature]

Register

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 1321

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

vs. Complainant

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

[Faint, mostly illegible text and lines, possibly bleed-through from the reverse side of the page.]

MINNIE RUTH GREER,
COMPLAINANT,
VS.
MACE RICHARD GREER,
RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NUMBER 1371.

STIPULATION

IT IS STIPULATED AND AGREED by and between the parties to this cause acting through their respective solicitors as follows:

1. In the event a Decree of Divorce is rendered in this cause the custody and control of the said child shall be granted to the said Respondent.
2. That the Respondent pay to the Complainant as alimony and for a quit claim deed to property owned by them jointly, in Bay Minette, the sum of \$500.00.

Bebe Hall
Ray W. Cooke
Solicitor for Complainant.

J. T. Blalock
Solicitor for Respondent.

Minnie Ruth Greer
Complainant,

VS.

Mace Richard Greer
Respondent.

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

NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from

Bay Minette, in the County of *Baldwin*

Alabama, the place of trial of said cause, to-wit:

Minnie Ruth Greer
and Millie Hervey

2. That said complainant requires an oral examination of said witnesses before a com-

missioner appointed by the Register of this Court.

Beebe Hall
By W.C. Beebe
Solicitor for Complainant.

NOTE:

Complainant suggests the name of

Eloise Rasberry

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Beebe Hall
By W.C. Beebe
Solicitor for Complainant.

DEMAND FOR ORAL EXAMINATION.

.....
Complainant,

Vs.

.....
Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA—IN EQUITY.

Filed this 22 day of Sept,
1945.

.....
Register.

Minnie Ruth Green

Mrs Richard Green

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,

Answer
of defendant agreement of parties
and deposition of Minnie Ruth
Green and Minnie Henry

and in behalf of Defendant upon

Answer and agreement
of parties

Joseph O'Neil
Register

Register.

RECORDED

No. 1371

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

vs.

NOTE OF TESTIMONY

Filed in Open Court this 24
day of Sept, 1945
Rachel Register.

STATE OF ALABAMA,
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU that you summon MACE RICHARD GREER, 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 MINNIE RUTH GREER, against the said Mace Richard Greer, 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 said Court, this the 17th day of July, 1945.


Register

MINNIE RUTH GREER,)	IN THE CIRCUIT COURT OF
COMPLAINANT,)	BALDWIN COUNTY, ALABAMA,
VS.)	IN EQUITY.
MACE RICHARD GREER,)	
DEFENDENT)	

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

Comes your Complainant, Minnie Ruth Greer, and humbly complaining against Mace Richard Greer, Defendant, respectfully shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the said Defendant are both over the age of twenty-one years and residents of Baldwin County, Alabama; that the Defendant has the last few weeks been temporarily so journeying in Mobile, sleeping in the home with his mother, at 502 Palmetto Street, Mobile, Alabama;

2.

That your Complainant and the said Defendant are husband and wife, having entermarried in Uriah, Baldwin County, Alabama

in the year 1939; that there was born to them a child whose name is Mace Richard Greer, Jr., now of the tender age of six (6) years.

3.

That the Defendent is a man of cruel and ungovernable temper and on the evening of June 3, 1945, unmercifully beat this Complainant with his fist and threatened to shoot her, and made an effort to do so, and but for Complainant's getting out of the way, would have shot her, and on the morning of June 4 drove her from her home in Bay Minette, and told her not to return, and if she did, he would kill her. Complainant was without fault. From his conduct and treatment of her, Complainant has reasonable cause to believe and does believe that should she continue to live with the Defendent, he would do her bodily harm attendant with danger to her life or health;

4.

That Defendent is not only a man of cruel and ungovernable temper but also a habitual drunkard, and is not a suitable man to have the care and custody of the said minor child, but he has carried the said child to Mobile with him and denied the custody of the child to this Complainant, and, as well, denied said Complainant the right to see the said child, and Complainant is solicitious that her said child is not receiving the proper care and attention.

The Defendent is employed at one of the shipyards in Mobile, and earns \$250.00 to \$300.00 a month, and is amply able to properly support and maintain your petitioner and said child, and, as well, to pay a reasonable attorney's fee for her solicitors in this cause. Complainant is without funds and without means of support for herself and her minor child and to pay her solicitor in this cause.

THEREFORE, Complainant prays this Honorable Court will take jurisdiction of the cost made by this bill of Complaint and

will by proper process make the said Mace Richard Greer party Defendant hereto, and require him to plead, answer, or demur to this bill of Complaint within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that pending this cause this Honorable Court will order a reference to determine a reasonable attorney's fee for Complainant's attorneys and a reasonable alimony for Complainant pending this suit, and that this Honorable Court will take custody of the said Mace Richard Greer, Jr., minor child, and deliver said child into the custody of Complainant subject to the final order of this Honorable Court.

Complainant further prays that upon the final hearing of the cause made by this Bill of Complaint, this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this Complainant and the said Defendant, and that this Honorable Court will further order, adjudge, and decree that this Complainant have the custody of the said Mace Richard Greer, Jr., and that such child be placed in the custody of this Complainant, and Complainant further prays that this Honorable Court will make and enter a decree fixing an amount to be paid to this Complainant as permanent alimony by the said Defendant at such times as to this Honorable Court shall seem proper; and order and decree that said Defendant pay the same under penalty of the law; and Complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive.

BEEBE & HALL

By:

W. Beebe
Solicitors for the Complainant.

424

No 1371

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e 29

RECORDED

MINNIE RUTH GREER

VS

19 Matthews

MACE RICHARD GREER

SUMMONS AND
COMPLAINT

RECORDED

FILED JULY 17 1945

Raduck
Register

Received 18 Day of July 1945
and on 19 Day of July 1945
I served a copy of the within Subpoena and
Complaint
BY SERVICE ON Mace Richard Greer

W. H. HOLOMB, CLERK
BY D. G. Matthews

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

Minnie Ruth Greer

Complainant

VS.

Mace Richard Greer

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~
on ~~answer of Defendant~~ 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 here-
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,
and that the said Minnie Ruth Greer
is forever divorced from the said Mace Richard Greer

for and on account of cruelty

It is further ordered, judged and decreed that the Defendant
have the custody and control of their minor child, Mace Richard
Greer, Jr.

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

This 24 day of September, 1945

G. W. Hare

Judge Circuit Court, in Equity.

I, Alice J. 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 23 day

of July, 1962

Alice J. Duck

Register of Circuit Court, in Equity

