

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

JOHN L. DAVIS

Complainant

VS.

WINNIE D. DAVIS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Answer & Confession~~  
on Answer & 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 here-  
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved,  
and that the said John L. Davis  
is forever divorced from the said Winnie D. Davis

for and on account of Abandonment.

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

This 22<sup>nd</sup> day of October, 1945

*J. M. 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. 1433 Page \_\_\_\_\_

**The State of Alabama**  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

vs. Complainant

Respondent

**DIVORCE DECREE**

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

\_\_\_\_\_, 194

Register

JOHN L. DAVIS  
COMPLAINANT

vs.

WINNIE D. DAVIS  
RESPONDENT

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 and Waiver of the Respondent, and testimony of John L. Davis.

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



Register.

No. 1423 RECORDED

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

*Davis*

vs.

*Davis*

NOTE OF TESTIMONY

Filed in Open Court this 18  
day of Oct, 1945  
*R. H. Neal*  
Register.

THE STATE OF ALABAMA,  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

JOHN L. DAVIS \_\_\_\_\_ Complainant

VS.

WINNIE D. DAVIS \_\_\_\_\_ Respondent

I, Lillian Patterson

as ~~Register and~~ Commissioner \_\_\_\_\_

have called and caused to come before me John L. Davis

witness \_\_\_\_\_ named in the Requirement for Oral Examination, on the 17th day of October  
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 John L. Davis  
\_\_\_\_\_ doth depose and say as follows:

My name is John L. Davis. 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 resident of Baldwin County, Alabama, however, presently is in the State of California. The Respondent and I are husband and wife, having married at Tallahassee, Florida on September 8th, 1941. We lived together as husband and wife in Baldwin County, Alabama, until in July, 1942, when the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time. The Respondent has repeatedly stated that she will never live with me again, and infact has refused to let me see her. There is absolutely no chance of us ever again living together as husband and wife.

John L. Davis

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 him and he signed the same in the presence of myself and H. 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 17th day of October, 1945.

Lillian Patterson (L. S.)

NO. 1433 PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Deane

vs. Complainant

Dowd

Respondent.

Oral Deposition

Filed Oct 18, 1945

W. H. Hall, Register.

Recorded in

Record

Vol. \_\_\_\_\_

Page \_\_\_\_\_

, Register.

JOHN L. DAVIS,  
COMPLAINANT,  
VS.  
WINNIE D. DAVIS,  
RESPONDENT.

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

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

The Respondent admits that the Complainant and the Respondent are both over twenty-one years of age, and that the Complainant is a bona fide resident of Baldwin County, Alabama; that they were married at Tallahassee, Florida, on September 8, 1941.

The Respondent denies the allegations as to abandonment 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.

Winnie D. Davis

STATE OF CALIFORNIA  
COUNTY OF SAN DIEGO

I, MABLE STOCKMAN, a Notary Public, in and for said County, in said State, hereby certify that Winnie D. Davis, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 11 day of October, 1945.

Mable Stockman  
Notary Public, San Diego County, Calif.

My Commission expires Sept. 19, 1946.



JOHN L. DAVIS,  
COMPLAINANT,

VS.

WINNIE D. DAVIS,  
RESPONDENT.

RECORDED

ANSWER AND WAIVER.

*Good*  
*Oct 18-1945*

*John L. Davis*

1433

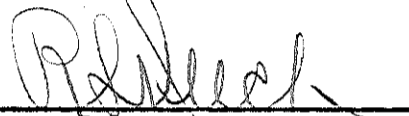


STATE OF ALABAMA,  
BALDWIN COUNTY.

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETINGS:

WE COMMAND YOU that you summon Winnie D. Davis 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 John L. Davis, against the said Winnie D. Davis, 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 18 day of October, 1945.

  
Register

JOHN L. DAVIS,  
COMPLAINANT,  
VS.  
WINNIE D. DAVIS,  
RESPONDENT.

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

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

Your Complainant, JOHN L. DAVIS, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age; that the Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama, however, is presently residing in the State of California;

2.

That your Complainant and the Respondent were married at Tallahassee, Florida, on September 8th, 1941, and lived together as husband and wife until in July, 1942;

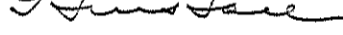
3.

That in July, 1942, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time;

WHEREFORE, the premises considered, Complainant prays that your Honor will by proper process, make the said Winnie D. Davis party Respondent to this cause of action, requiring her 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 a hearing hereof, enter an order and decree, granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different, or general relief as he may in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL'

By:   
Solicitors for the Complainant.

1433

RECORDED

JOHN L. DAVIS,

COMPLAINANT,

VS.

WINNIE D. DAVIS,

RESPONDENT.

SUMMONS AND COMPLAINT.

*Filed Oct 18-1945*  
*[Signature]*

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 John L. Davis

as witnesses in behalf of Complainant in a cause pending in our

Circuit Court in Baldwin County, of said State, wherein John L. Davis

\_\_\_\_\_ Complainant

and Winnie D. Davis

\_\_\_\_\_ Respondent

on oath, to be by you administered, upon John L. Davis

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

Witness 18 day of Oct, 1945

[Signature]  
Register

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No.

1433

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

*Davis*

Complainant

vs.

*Davis*

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES: