

VIRGINIA WILLIAMS,
Complainant,
VS.
JUNIUS WILLIAMS,
Respondent.

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

Comes your Complainant, VIRGINIA WILLIAMS, and humbly complaining against your Respondent, JUNIUS WILLIAMS, respectfully represents and shows unto your Honor and this Honorable Court as follows:

FIRST:

That both your Complainant and Respondent are bona fide residents of Baldwin County, Alabama, over twenty-one years of age; that they have been such residents of Baldwin County, Alabama, for more than three years; that the Complainant and Respondent were married at Bay Minette, in Baldwin County, Alabama, on December 11th, 1928, and lived together, in Baldwin County, Alabama, as husband and wife until on to-wit, October 22nd, 1935;

SECOND:

That on to-wit, October 22nd, 1935, and various other times prior thereto, the Respondent cursed, abused, mistreated, and threatened to kill your Complainant; that on various occasions he did actual violence to her by striking her; that his conduct was such that your Complainant had reasonable apprehension to believe, and did believe, that should she continue to live with him, he would carry out his threats and continue to do violence to her, which would endanger her life and health;

WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said JUNIUS WILLIAMS party respondent to this Bill of Complaint, 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 a final hearing of this cause, give and grant unto her a decree of absolute divorce, forever barring the bonds of matrimony heretofore existing between her and the Respondent.

Complainant prays for 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.

Virginia Williams
Complainant.
Beale & Stace
Solicitors for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs First and Second, but not under oath, oath being hereby expressly waived.

Virginia Williams
Complainant.
Beale & Stace
Solicitors for Complainant.

Respondent lives at Stockton, Alabama.

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon JUNIUS WILLIAMS

of BALDWIN County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

VIRGINIA WILLIAMS

against said JUNIUS ~~VIRGINIA~~ WILLIAMS

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 1st day of May 1936

Robert S. Duck Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

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 a final hearing of this cause, give and grant unto her a decree of absolute divorce, forever harring the bonds of matrimony heretofore existing between her and the respondent.

Complainant prays for 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.

Handwritten notes:
as /
I /
want /
relief /
I /
trust /
A

Virginia Williams
Complainant.
Beebe Hale
Solicitors for Complainant.

FOOT NOTE:

The Respondent is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs First and Second, but not under oath, oath being hereby expressly waived.

Virginia Williams
Complainant.
Beebe Hale
Solicitors for Complainant.

Respondent lives at Stockton, Alabama.

The State of Alabama }
Baldwin County }

Circuit Court of Baldwin County, Alabama,
(In Equity)

VIRGINIA WILLIAMS,

COMPLAINANT

VS.

JUNIUS WILLIAMS

RESPONDENT

I, ROBERT S. DUCK

as Register and Commissioner of the Circuit Court of Baldwin County, Ala.,
have called and caused to come before me Virginia Williams and Leslie Smith

witnesses named in the requirement for Oral Examination, on the 20th day of June
1935, at the office of Clerk of the Circuit Court of Baldwin County,
in Bay Minette, Alabama, and having first sworn said witnesses to speak the
truth, the whole truth, and nothing but the truth, the said VIRGINIA WILLIAMS

doth depose and say as follows:

My name is Virginia Williams. I am a bona-fide resident of Baldwin County, Alabama, over twenty-one years of age. I live at Stockton, Alabama. The Respondent, Junius Williams, is over twenty-one years of age. We have lived at Stockton, in Baldwin County, for more than three years next preceding the filing of this bill of complaint.

Junius Williams and I were married at Bay Minette, in Baldwin County, Alabama, on December 11th, 1926. We lived together as husband and wife, in Baldwin County, Alabama, until in October, 1935.

The Respondent, Junius Williams, is a man of ungovernable temperament, and on various occasions cursed, abused, mistreated and threatened to kill me. Several times he actually struck me. On October 22nd, 1935, he got mad with me, through no fault on my part, and abused me, striking me with a stick, and drove me away from the house. His conduct was such that it was impossible for me to longer live with him. I have not lived with him since October, 1935, when he drove me away from home. The conduct of Junius Williams was such that I had every reason to believe, and did believe, that should I continue to live with him, he would continue to threaten, and abuse me and do further violence to my person, which would endanger my life and health.

Virginia Williams

VIRGINIA WILLIAMS,

VS.

JUNIUS WILLIAMS,

Complainant,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 217.

And now comes the Respondent, JUNIUS WILLIAMS, in his own proper person and waives notice of the time of taking testimony on behalf of the Complainant, the right to cross-examine witnesses of the Complainant, and consents that the cause may be submitted for final decree forthwith without any further notice.

Junius Williams

WITNESSES:

Mary Lou Fortenberry

The State of Alabama,
Baldwin County.

} No. **217** **CIRCUIT COURT IN EQUITY.**

..... **Virginia Williams.** Complainant.....

vs.

..... **Junius Williams.** Defendant.....

Motion is hereby made for a Decree Pro Confesso against **Junius Williams.**

..... Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This **22** day of **June,** 19 **36**

..... **Beebe & Hall** Solicitor,

The State of Alabama,
Baldwin County.

No. 217 CIRCUIT COURT IN EQUITY.

Virginia Williams,

Complainant

vs.

Junius Williams,

Defendant

In this cause it appears to the Register,
that a summons requiring the Defendant Junius Williams.

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days
after the service of said Summons upon Him
was served upon him by the Sheriff of Baldwin County, Alabama, on the
20th day of May 1936

And the said Defendant, having failed to demur, plead to or answer the said Bill of Complaint
to this date, it is now, therefore, on motion of Beebe & Hall.

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things
taken as confessed against the said Junius Williams.

Defendant aforesaid.

This 22 day of June 1936

Robert D. ...

Register.

VIRGINIA WILLIAMS,
Complainant,
VS.
JUNIUS WILLIAMS,
Respondent.

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

This cause coming on to be heard was submitted upon the original Bill of Complaint and pleadings and proof as noted by the Register, and the Court, after due consideration, is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant and the Respondent be, and they are hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED that the Complainant pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said VIRGINIA WILLIAMS shall not again marry, except to the said JUNIUS WILLIAMS, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said JUNIUS WILLIAMS, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, this _____
day of June, 1936.

Judge of the Circuit Court of
Baldwin County, Alabama.

STATE OF ALABAMA,

BALDWIN COUNTY.

I, ROBERT S. DUCK, Register of the Circuit Court of Baldwin County, Alabama, in Equity, do hereby certify that the above and foregoing is a full, true and correct copy of the decree rendered by the said Court on the _____ day of June, 1936, in the case of VIRGINIA WILLIAMS, Complainant, vs. JUNIUS WILLIAMS, Respondent, as the same appears on file in the said Court.

WITNESS my hand and seal of said Court on this _____ day of June, 1936.

Register of the Circuit Court
of Baldwin County, Alabama.

OFFICE OF THE REGISTER

VIRGINIA WILLIAMS,

Complainant,

vs.

JUNIUS WILLIAMS,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

ROBERT S. DUCK,

VIRGINIA WILLIAMS,
Complainant,
VS.
JUNIUS WILLIAMS,
Respondent.

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

This cause coming on to be heard was submitted upon the original Bill of Complaint and pleadings and proof as noted by the Register, and the Court, after due consideration, is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant and the Respondent be, and they are hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED that the Complainant pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said VIRGINIA WILLIAMS shall not again marry, except to the said JUNIUS WILLIAMS, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said JUNIUS WILLIAMS, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, this 25th day of June, 1936.

F. W. Hare
Judge of the Circuit Court of
Baldwin County, Alabama.

CHANCERY EXECUTION

BILL OF COSTS

Luzerna William
vs
Jacques William

No. 217

Plaintiff

Defendant

FEES OF REGISTER	Dollars	Cents	Brought Forward		
Filing each bill and other papers	\$	10			
Issuing each subpoena		50			
Issuing each copy thereof		40			
Entering each return thereof		15			
For each order of publication	1	00			
Issuing writ of injunction	1	50			
For each copy thereof		50			
Entering each return thereof		15			
Issuing Writ of Attachment	1	00			
Entering each return thereof		15			
Docketing each case	1	00	100		
Entering each appearance		25			
Issuing each decree pro confesso on per. ser.	1	00	100		
Issuing each decree pro confesso on publica.	1	00			
Each order appointing guardian	1	00			
Any other order by Register		50			
Issuing commission to take testimony		50			
Receiving and filing		10			
Endorsing each package		10			
Entering order submitting cause		50			
Entering any other order of court		25			
Noting all testimony		50			
Abstract of cause, etc.	1	00			
Entering each decree		75			
For every 100 words over 500		15			
Taking account, etc.	3	00			
Taking testimony, etc.		15			
Each report, 500 words or less	2	50			
For every 100 words over 500		15			
Amount claimed less than \$500, etc.	2	00			
Issuing each subpoena		25			
Witness certificate, each		25			
Issuing execution, each		75			
Entering each return		15			
Taking and approving bond, each	1	00			
Making copy of bill, etc.		15			
Each notice not otherwise provided for		50			
Each certificate or affidavit, with seal		50			
Each certificate or affidavit, no seal		25			
Hearing and passing on application, etc.	3	00			
Each settlement with receiver, etc.	3	00			
Examining each voucher of Receiver, etc.		10			
Examining each answer, etc.	3	00			
Recording resignation, etc.		75			
Entering each certificate to Supreme Court		50			
Taking questions and answers, etc.		25			
For all other ser relating to such proceedings	1	00			
For services in proceeding to relieve minors, etc.. same fee as in similar cases.					
Commission on sales, etc: 1st \$100, 2 per ct.; all over \$100 and not exceeding \$1,000, 1 1-2 per ct; all over \$1,000, and not exceeding \$20,000, 1 per ct.; all over \$20,000, 1-4 of 1 per ct.					
Sub Total Carried Forward					
					\$ 445
			For Receiving, keeping and paying out or distributing money, etc.; 1st \$1,000, 1%, all over \$1,000, and not over \$5,000, 3-4 of 1%; all over \$5,000 and not exceeding \$10,000, 1-2 of 1%, all over \$10,000 1-4 of 1%.		
			Receiving, keeping and paying out money paid into court, etc., 1-2 of 1% of amount received.		
			Each notice sent by mail to creditor	15	
			Filing, receipting for and docketing each claim, etc.	25	
			For all entries on subpoena docket, etc.	50	
			For all entries on commission docket, etc.	50	
			Making final record, per 100 words	15	
			Certified copy of decree	1 00	\$ 300
			Report of divorce to State Health Office (Acts 1915)	50	\$ 50
			Total Fees of Register		1195
			FEES OF SHERIFF		
			Serving and returning subpoena on deft.	\$1 50	
			Serving and returning subpoena for witness	65	
			Levying attachment	3 00	
			Entering and returning same	25	
			Selling property attached		
			Impaneling Jury	75	
			Executing writ of possession	2 50	
			Collecting execution for costs	1 50	
			Serving and returning sci. fa., each	65	
			Serving and returning notice	65	
			Serving and returning writ of injunction	1 50	
			Serving and returning writ of exeat	1 50	
			Taking and approving bonds, each	75	
			Collecting money on execution		
			Making deed	2 50	
			Serving and returning application, etc.	1 00	
			Serving attachment, contempt of court	1 50	
			Total Fees of Sheriff		
			RECAPITULATION		
			Register's Fees		1195
			Sheriff's Fees		150
			Commissioner's Fees		500
			Solicitor's Fees		
			Witness Fees		
			Guardian Ad Litem		
			Printer's Fees		
			Trial Tax	3 00	300
			Recording Decree in Probate Court		
			Total		2145

The State of Alabama,

No. 217

Baldwin County.

Circuit Court, In Equity

Term, 193

To Any Sheriff of the State of Alabama—GREETING:

You are hereby commanded, That of the goods and chattels, lands and tenements of

Defendant

you cause to be made the sum of _____ Dollars,

which _____ Plaintiff

recovered of _____ on the _____ day of _____ 193

by the judgment of our Circuit Court, held for the county of Baldwin, besides the sum of _____

Dollars,

costs of suit, and have the same to render to the said _____ and make return of this Writ and the execution thereof, according to law.

Interest from _____ 193 to date of collection.

Witness my hand, this _____ day of _____ 193

Register.

check

RECORDED

No. 217

Page 6-415

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

Virginia Williams.

vs.

Junius Williams.

MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE

Filed June 22 1936 19

Robert L. Gray

Register.

Recorded in Record.

Vol. Page.

Register.

Serve on JUNIUS WILLIAMS

Circuit Court of Baldwin County
IN EQUITY

No. 217

SUMMONS

VIRGINIA WILLIAMS

JUNIUS WILLIAMS

vs.

BEER & HALL
Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED
INDEXED
6-30

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this _____

day of _____, 193_____

SHERIFF

Executed this 20 day of

May 1936

by leaving a copy of the within Summons with

Junius Williams

Defendant

M. H. Williams

Sheriff

E. W. Anderson

Deputy Sheriff

0

Book
RECORDED
6-390
OF COMPLAINT.

VIRGINIA WILLIAMS,

Complainant,

VS.

JUNIUS WILLIAMS,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed May 1, 1936
Robert S. Duck,
Reg.

ORAL EXAMINATION

I, Robert S. Duck as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they 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 es or had proof 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 23 day of June 19 36
Robert Duck (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

VS.

RESPONDENT

ORAL DEPOSITION

Filed June 23, 1936

Robert S. Duck Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

ORAL EXAMINATION

I, Robert S. Duck as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and Herbert M. Haele at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof 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 23 day of June 19 36
Robert Duck (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

VS.

RESPONDENT

ORAL DEPOSITION

Filed June 23, 1936

Robert S. Duck Register.

RECORDED IN

Record _____

Vol. _____ Page _____

Register _____

RECORDED

Duck

Page *6. 110*

No.

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

VS.

REQUEST FOR DECREE IN
VACATION

FILED

June 23

192

36

Robert S. Duck

Register

RECORDED IN RECORD

VOL. PAGE

Register

RECORDED

Duck
6-415

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

vs.

NOTE OF TESTIMONY

Filed in Open Court this *23rd*

day of *June* 193*6*

Robert S Duck

REGISTER

RECORDED
INDEXED
6-7-15

No.

Page.....

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

VS.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE**

Issued 4th 23 1938
D. W. ...
Register.

Moore Printing Company, Bay Minette, Ala.

Book
RECORDED
2-210

FINAL DECREE OF DIVORCE.

VIRGINIA WILLIAMS,

Complainant,

VS.

JUNIUS WILLIAMS,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed Jan 26 1936
Robert L. Street
Registrar