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BESSIE WILSON,

\_\_\_\_\_

Complainant,

\_\_\_\_\_

vs.

\_\_\_\_\_

C. S. WILSON,

\_\_\_\_\_

Respondent.

\_\_\_\_\_

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, ; Testimony  
of Bessie Wilson, Complainant;

and in behalf of Defendant upon Answer & Waiver.

\_\_\_\_\_ Register.

*Handwritten Signature*

The State of Alabama, {  
Baldwin County

CIRCUIT COURT

To ORA S. NELSON:

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 Bessie Wilson,

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

BESSIE WILSON,

Complainant

and C. S. WILSON,

Defendant,

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

Witness 14th day of February 1939

**R. S. DUCK**

clerk, - register REGISTER

*Arthur Thompson*  
Deputy

COMMISSIONER'S FEE, \$ \_\_\_\_\_

WITNESS' FEES, \$ \_\_\_\_\_

BESSIE WILSON,  
Complainant,  
VS.  
C. S. WILSON,  
Respondent.

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

ANSWER.

Now comes C. S. Wilson, the Respondent in the above entitled cause, and for answer to the Bill of Complaint filed therein says:

I, C. S. Wilson, being the identical person named in the Bill of Complaint, do hereby accept service in the above matter, a copy of said Bill of Complaint having been delivered to me, and do hereby waive any and all service which may be required or provided by the laws of the State of Alabama.

I further waive any notice as to the taking of testimony in said cause, and Complainant may take testimony whenever she desires without my being present.

I further agree that said cause may be submitted at any time which suits the convenience of the Complainant without further notice to me and that this Court may enter Decree in said cause at any time it is submitted to it for such Decree, it being my intent to waive all of the formal notices and requisites of the law as to submitting said cause, as to answering said cause and as to taking of the depositions of the witnesses in said cause, but insist that the Complainant be required to prove the material allegations of her Bill of Complaint.

I deny each and every allegation of the Bill of Complaint which has not been hereinabove specifically answered and require that strict proof be made of said allegations.

*Hic*  
C. S. *x* Wilson  
Respondent. *Mark*

WITNESSES:

W. R. Wilson

BESSIE WILSON,  
Complainant,  
VS.  
C. S. WILSON,  
Respondent.

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

DECREE OF DIVORCE.

This cause coming on to be heard was submitted upon the original Bill of Complaint, Answer 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 her said Bill of Complaint: IT IS THEREFORE Ordered, Adjudged and Decreed by the Court as follows:

1. That the bonds of matrimony heretofore existing between the Complainant and Respondent be, and the same are hereby dissolved and the said Bessie Wilson is forever divorced from the said C. S. Wilson, on the ground of cruelty.
2. That the said Bessie Wilson be, and she is hereby permitted to resume the use of her former name of Bessie Roper.
3. That the said Complainant and Respondent be, and they are hereby permitted to again contract marriage but shall not marry except to each other until sixty days after this date, and if an appeal is taken within sixty days, they shall not marry again except to each other during the pendency of said appeal.

Done at Monroeville, Alabama, on this the 24<sup>th</sup> day of February, 1939.

  
\_\_\_\_\_  
Judge of the Circuit Court.

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

Your Oratrix, Bessie Wilson, presents this Bill of Complaint against C. S. Wilson, and thereupon your Oratrix complains and shows unto the Court and your Honor as follows:

1. Your Oratrix is over twenty-one years of age and a resident of Escambia County, Florida, and the Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama.

2. Your Oratrix and the Respondent were lawfully married at Bay Minette, in Baldwin County, Alabama, on August 10, 1936, by a minister of the gospel, and lived together as man and wife in Baldwin County, Alabama, until about May 1st, 1938, when they separated, at which time they were living in Baldwin County, Alabama.

3. Your Oratrix further avers that about six months prior to the said separation the said C. S. Wilson became very angry with her children and threatened to knock them in the head. This action on the part of the said Respondent continued up to the time of the said separation and often during this intervening period of time he became very angry with your Oratrix because of the said children and during these fits of anger displayed an ungovernable temper, and from the actions of the said Respondent your Oratrix was put in fear of being severely injured or done great bodily harm if she tried to continue to live with him. After the said actions on the part of the said Respondent and on or about May 1, 1938, your Oratrix separated from the said Respondent and has not lived with him since the said date.

PRAYER FOR PROCESS.

Your Oratrix further prays that the said C. S. Wilson be made a party respondent to this Bill of Complaint and that the usual process of this Honorable Court do forthwith issue to him.

PRAYER FOR RELIEF.

Your Oratrix further prays that upon a final hearing of this cause your Honor will grant unto her a decree dissolving the bonds of matrimony now existing between her and the said C. S. Wilson, granting unto her an absolute divorce and granting unto her the right to marry again and the right to resume the use of her former name of

Bessie Roper. Your Oratrix further prays for such other, further and general relief as she may be equitably entitled to the premises considered.

J. B. Blackburn  
Solicitor for Complainant.

FOOT NOTE: The Respondent is required to answer each and every allegation of the foregoing Bill of Complaint numbered 1 to 3 both inclusive, but not under oath, the benefit whereof is hereby expressly waived.

J. B. Blackburn  
Solicitor for Complainant.

The State of Alabama }  
Baldwin County

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

BESSIE WILSON

COMPLAINANT

vs.

C. S. WILSON

RESPONDENT

I, Ora S. Nelson

as ~~Registrar~~ Commissioner

have called and caused to come before me Bessie Wilson

witness named in the Requirement for Oral Examination, on the 14th day of February

1939, at the office of J. B. Blackburn

in Bay Minette, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Bessie Wilson

doth depose and say as follows:

TESTIMONY OF BESSIE WILSON.

My name is Bessie Wilson. I am over twenty-one years of age and a resident of Escambia County, Florida. C. S. Wilson, the Respondent, is over twenty-one years of age and a resident of Baldwin County, Alabama.

I was lawfully married to the Respondent, C. S. Wilson, at Bay Minette, Alabama, on August 10, 1936, by W. J. Hobbs, a minister of the gospel and lived with the Respondent as his wife near Spanish Fort, in Baldwin County, Alabama, until about the 1st day of May, 1938, when we separated.

During the month of December, 1937 the Respondent, C. S. Wilson, became very angry with some of my children who were his step-children, lost his temper completely and threatened to knock them in the head. He, at this time also became very angry with me and because of his anger and threats which he made, and because of the fact that he has an ungovernable temper, I was afraid that I would be seriously injured or done great bodily harm. These fits of anger on the part of the Respondent, C. S. Wilson, continued from December 1937 up until the time we separated about the first of May, 1938, and his anger and temper grew worse instead of better during this period of time until, because of his actions and because of his ungovernable temper, I was put in fear of being severely injured and done great or grievous bodily harm if I tried to continue to live with him, and separated from him about May 1st, 1938, and have not lived with him since the said date.

During the last six months that I lived with the Respondent I did not have control of myself due to the fact that I was worried. This worry was caused by his threats and his ungovernable temper and I lost weight and my health became impaired during the last six months that I lived with the Respondent.

My former name was Bessie Roper.

Bessie Wilson

ORAL EXAMINATION

I, Ora S. Nelson, 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... and read over to her and she signed the same in the presence of myself and J. B. Blackburn at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ... or had proof 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 14th day of February 1939.

Ora S. Nelson (L. S.)

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

The State of Alabama  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

VS.

RESPONDENT

ORAL DEPOSITION

Filed Feb. 24, 1939

P. S. Duck, Register  
By Walter Thompson,  
RECORDED IN Registry

Record

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Register