

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

Comes the Complainant EVIE WILLIS and humbly complains against AUDLEY WILLIS, respectively represents and shows unto your Honor and this Honorable Court as follows:

ONE:

That your complainant, Evie Willis and the respondent, Audley Willis, are both bona fide residents of Baldwin County, Alabama, and have been for more than three years next preceding the filing of the Bill of Complaint in this cause; that both are over twenty-one years of age.

TWO:

That your complainant and the respondent were married at Foley, in Baldwin County, Alabama, on to-wit, August 12th, 1922.

THREE:

That they lived together as husband and wife in Baldwin County, Alabama, until on to-wit, September 2nd, 1934; that on to-wit, September 2nd, 1934, and various times prior thereto the respondent abused and actually struck your complainant; that his conduct was such as to cause your complainant to believe that he would continue to abuse her if she should live with him.

FOUR:

That there were born to said marriage three children: Clarence Willis, Archie Willis and David Willis, eleven, eight, and three years old respectively; that the said children have lived with their mother, your complainant, all their lives,

who is able and willing to care for them; that the respondent, on account of his conduct, is an unfit and improper person to have the care, custody and control of said children.

FIVE:

That your complainant has no means with which to support said children, or with which to employ counsel to prosecute this matter for her; that the respondent is an able bodied man, capable of providing for himself, your complainant and the said children.

WHEREFORE the premises considered, your complainant prays that your Honor will by proper process make the said Audley Willis, 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 practise of this Honorable Court;

That your Honor will order a reference to determine a reasonable attorney's fee to be paid by the respondent to the complainant in this cause, and alimony pendente lite and permanent.

Complainant further prays that your Honor upon a final hearing of this cause, will enter a decree forever barring the bonds of matrimony existing between her and the respondent, Audley Willis; that your Honor will enter a further decree awarding to her the care, custody and control of the said children: Clarence Willis, Archie Willis and David Willis; that your Honor will enter a further decree awarding to her such amount as your Honor thinks proper as permanent alimony.

Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitle to receive, and as in duty bound she will ever pray.

Beebe & Stagg  
Solicitors for Complainant.

FOOT NOTE: The respondent is required to answer each and every allegation contained in the foregoing bill of complaint, in paragraphs one to five, inclusive, but not under oath, oath being hereby expressly waived.

Beebe & Stagg  
Solicitors for Complainant

~~RECORDED~~  
10/18/34

EVIE WILLIS,

Complainant,

VS.

AUDLEY WILLIS,

Respondent.

BILL OF COMPLAINT

Filed this the 18 day of  
October, 1934.

M. A. Stone  
Register.

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BEEBE & HALL  
LAWYERS  
BAY MINETTE, ALA.

EVIE WILLIS,  
Complainant,  
VS.  
AUDLEY WILLIS,  
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, decree pro confesso 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 the Respondent be, and the same are hereby dissolved and the Complainant is forever divorced from the Respondent on the grounds of cruelty.

IT IS FURTHER ORDERED that the Complainant, EVIE WILLIS, be and she is hereby permitted to again contract marriage upon payment of the cost of Court in this cause.

IT IS FURTHER ORDERED that the Respondent, AUDLEY WILLIS, pay the cost herein taxed, for which execution may issue, and that if such execution is returned "No property found", then let execution issue against the Complainant, EVIE WILLIS.

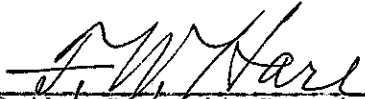
IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, AUDLEY WILLIS, pay to the Complainant the sum of TWENTY-FIVE (\$25.00) DOLLARS per month, payable on the first day of each month beginning with December 1st, 1934, as permanent alimony.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, AUDLEY WILLIS, pay to the Complainant, EVIE WILLIS, the sum of FIFTY (\$50.00) DOLLARS as Solicitor's fees expended by her in this cause.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant, EVIE WILLIS, shall have the custody, care and control of Clarence Willis, Archie Willis and David Willis, subject to the further orders and jurisdictions of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said EVIE WILLIS shall not again marry, except to the said AUDLEY WILLIS, until sixty (60) days after this date, and if an appeal is taken within sixty (60) days, she shall not marry again, except to the said AUDLEY WILLIS, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, on this the 11<sup>th</sup> day of December, 1934.

  
\_\_\_\_\_  
Judge of the Circuit Court of  
Baldwin County, Alabama.

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~~CONFIDENTIAL~~  
Book

EVIE WILLIS,

Complainant,

VS.

AUDLEY WILLIS,

Respondent.

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

-- Divorce --

Filed Dec. 6 1934  
M. A. Stone

The State of Alabama,  
Baldwin County.

No. 84 CIRCUIT COURT IN EQUITY.

Evie Willis Complainant  
vs.

Audley Willis Defendant.

In this cause it appears to the Register  
that a summons requiring the Defendant Audley Willis

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 Audley Willis  
was served upon him by the Sheriff of Baldwin County, Alabama, on the  
27th day of October 1934

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 H. M. Hall, Atty for Plf.

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 Audley Willis

Defendant aforesaid.

This 3rd day of December 1934

*H. M. Hall* Register.



**RECORDED**  
*June 1934*

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No. 84 Page       

**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

*Carie Walker*

vs.

*Quddy Miller*

**DECREE PRO CONFESSO ON  
PERSONAL SERVICE**

Issued Dec 3 1934

*W. A. Stone*  
Register.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 84                      Vacation                      Term, 192<sup>54</sup>

Evie Willis                      , Complainant

vs.

Audley Willis                      , Defendant

To M. A. Stone,                      , Register :

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by ~~BEERE & Hall~~

..... Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

*Beere & Hall*  
.....  
Solicitor for Complainant.

**RECORDED**

*check*

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No. 84 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY  
CIRCUIT COURT, IN EQUITY

Evie Willis

vs.

Audley Willis

REQUEST FOR DECREE IN  
VACATION

FILED December 5th 1954

*M. A. Stone*

Register

RECORDED IN \_\_\_\_\_ RECORD

VOL. \_\_\_\_\_ PAGE \_\_\_\_\_

Register

The State of Alabama, } No. 84 ... CIRCUIT COURT IN EQUITY.  
Baldwin County.

Eric Willis

Complainant

vs.

Audley Willis

Defendant

Motion is hereby made for a Decree Pro Confesso against

Audley

Willis

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...ha...failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This

29<sup>th</sup>

day of

Nov

19

31

Beebe Hall

Solicitor.

**RECORDED**

No. 84 Page Duck

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**The State of Alabama,**  
Baldwin County.

**CIRCUIT COURT, IN EQUITY**

vs.

**MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE**

Filed Nov 30 1934

Wm. C. [Signature]  
Register.

Recorded in \_\_\_\_\_ Record,

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

Register.

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

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Audley Willis

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

Evie Willis

against said Audley Willis

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, M. A. Stone, Register of said Circuit Court, this 18th day of October, 193 4

M. A. Stone Register

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

EVIE WILLIS,  
Complainant,  
vs.  
AUDLEY WILLIS,  
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, decree pro confesso 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 the Respondent be, and the same are hereby dissolved and the Complainant is forever divorced from the Respondent on the grounds of cruelty.

IT IS FURTHER ORDERED that the Complainant, EVIE WILLIS, be and she is hereby permitted to again contract marriage upon payment of the cost of Court in this cause.

IT IS FURTHER ORDERED that the Respondent, AUDLEY WILLIS, pay the cost herein taxed, for which execution may issue, and that if such execution is returned "No property found", then let execution issue against the Complainant, EVIE WILLIS.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, AUDLEY WILLIS, pay to the Complainant the sum of TWENTY-FIVE (\$25.00) DOLLARS per month, payable on the first day of each month beginning with December 1st, 1934, as permanent alimony.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, AUDLEY WILLIS, pay to the Complainant, EVIE WILLIS, the sum of FIFTY (\$50.00) DOLLARS as Solicitor's fees expended by her in this cause.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant, EVIE WILLIS, shall have the custody, care and control of Clarence Willis, Archie Willis and David Willis, subject to the further orders and jurisdictions of this Court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said EVIE WILLIS shall not again marry, except to the said AUDLEY WILLIS, until sixty (60) days after this date, and if an appeal is taken within sixty (60) days, she shall not marry again, except to the said AUDLEY WILLIS, during the pendency of the appeal.

Dated at Monroeville, Monroe County, Alabama, on this  
the \_\_\_\_\_ day of \_\_\_\_\_, 1934.

Judge of the Circuit Court of  
Baldwin County, Alabama.

STATE OF ALABAMA,  
BALDWIN COUNTY.

I, M. A. Stone, Clerk of the Circuit Court of Baldwin County, Alabama, and Register in Chancery, hereby certify that the foregoing is a full, true and correct copy of the decree of divorce rendered in the cause of Evie Willis, Complainant, vs. Audley Willis, Respondent, as the same appears of record in my office.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal on this \_\_\_\_\_ day of December, 1934.

Clerk of the Circuit Court of  
Baldwin County, Alabama, and  
Register in Chancery.





EVIE WILLIS

VS.

AUDLEY WILLIS

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, Personal Service on Summons, Motion for Decree Pro Confesso on personal Service, Decree Pro Confesso, Oral Depositions of Evie Willis, Mrs. John Lewis, and J. G. Shelby, Request for Decree in Vacation,

and in behalf of Defendant upon

*M. A. Stone*

Register.

**RECORDED**  
*Wuck*

84

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

**The State of Alabama**  
BALDWIN COUNTY

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

Evie Willis

vs.

Audley Willis

**NOTE OF TESTIMONY**

Filed in Open Court this 5th

day of December 1934

*W. A. Stone*  
REGISTER

The State of Alabama }  
Baldwin County }

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

Evie Willis

COMPLAINANT

VS.

Audley Willis

RESPONDENT

I, M. A. Stone

as Register and Commissioner

have called and caused to come before me Evie Willis, Mrs John Lewis, and J. G.

Shelby

witness<sup>es</sup> named in the requirement for Oral Examination, on the 5th day of December

1934, at the office of M. A. Stone

in Bay Minette, Alabama, and having first sworn said witness<sup>es</sup> to speak the

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

Evie Willis

doth depose and say as follows:

My name is Evie Willis, I am a resident of Baldwin County, Alabama, and have been for more than three years, next preceding the filing of the bill of complaint in this cause. I am over twenty-one years of age.

Audley Willis is over twenty-one years of age and a resident of Baldwin County, Alabama.

Audley Willis and I were married at Foley in Baldwin County, Alabama, on August 12th, 1922. We lived together as husband and wife in Baldwin County, Alabama, until September 2, 1934.

That on September 2, 1934, and various dates prior thereto the said Audley Willis, cursee, abused and actually struck the Complainant.

That on September 2, 1934, below Foley in Baldwin County, Alabama, while the Respondent and I were riding along in his truck, the Respondent got mad, cursed me, and threatened to kill me, and actually pulled me out of the truck and beat me over the shoulders and body with a hammer handle, ~~bruised~~ and then forced me to get back on the truck, and again dragged me out and beat me again with the hammer handle, and again made me get back in the truck and told me that he would kill me if I didn't get back on the truck. I got out of the truck on the opposite side and ran with him after me, until his Brother came got him and held him. The Respondent was drinking at the time. He has mistreated me on several occasions prior to this time, but on account of our Children I tried to live with him. His conduct was such that it was absolutely impossible for me to live with him.

We have three children: Clarence, Archie and David, eleven, eight and three years old, respectively. The children are now and have been all their lives living with me.

ORAL EXAMINATION

I, M. A. Stone 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 ... 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 5th day of December 1934.

M. A. Stone (L. S.)

No. 84

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THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

David Miller

COMPLAINANT

vs.

Quincy Miller

RESPONDENT

ORAL DEPOSITION

Filed Dec 5, 1934

M. A. Stone, Register.

RECORDED IN

Record

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Register

I have no means of earning a livelihood for myself and children except by my hands, and the care of the children render it impossible for me to get out to work and earn a living. I have no money to support myself and children, and no income.

The Respondent is an able bodied man. A carpenter by trade, easily capable of earning at least two dollars and fifty cents a day.

The respondent has contributed ~~nothing~~ nothing to the support of me and the children since September, 1934, and prior to that time just partially provided for us.

Evie Willis

Mrs. John Lewis a witness for the Complainant being first duly sworn, deposes and says:

My name is Mrs. John Lewis. I live at Foley in Baldwin County, Alabama. I am a sister of the Complainant in this cause. The Complainant is living near where I live.

I know that my Sister and Audley Willis had had trouble on various occasions prior to the time that she was forced to leave him, last September.

I did not actually see the respondent strike the Complainant, but saw her immediately thereafter, and know that her shoulders were bruised, and hand was torn where, she said that Willis had beat her with a hammer handle.

I know that the Respondent has ~~has~~ not contributed anything toward the care and support of my Sister and her children since last September. My Sister's children are small and her attention is needed at home. She has no income, of money to provide for herself and children.

Mrs. John Lewis

J. G. Shelby a witness for the Complainant being first duly sworn, deposes and says:

My name is J. G. Shelby. I am the father of Evie Willis, the Complainant in this cause.

Audley Willis, the Respondent, is an able bodied man. Carpenter by trade, and capable of earning, at least, \$2.50 per day.

My daughter has no means of support for herself and children, and no money.

The Respondent on account of his conduct, and the fact that he drinks liquor to extreme is not a fit and proper person to have the care and control of the minor children.

J. G. Shelby +