

TO THE HONORABLE HU B. WEBSTER, JUDGE HOLDING DOMESTIC
RELATIONS COURT AT KNOXVILLE FOR THE COUNTY OF KNOX.

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WILLIAM JACKSON BRYAN, a resident of Knox County, Tennessee,
COMPLAINANT.

VERSUS

WILMA TINDELL BRYAN, a resident of Knox County, Tennessee,
DEFENDANT.

The complainant would respectfully show to the Court.

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That he and the defendant were married at Knoxville, Knox County, Tennessee, on September 1, 1943, while he was on leave from the U. S. Navy and that he and defendant are residents of and have been residents of Knox County, Tennessee, for many years and for more than two years before the filing of the bill.

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That before and since their marriage defendant has been employed as a domestic in a private home, where she also lives, and shares a room with a 16 year old boy, the son, of the family she lives with. In November 1943 complainant had a leave with only 24 hours to spend at home. Complainant notified defendant that he had the leave and the time of his arrival in Knoxville, which was 6:30 A.M. defendant did not meet him at the train and refused to come and be with him, with the excuse that she had to get Thanksgiving dinner, and did not see complainant until she allowed him to come after her at 5:30 P. M. when half of his 24 hour

leave had expired.

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Complainant has provided an allotment of \$50.00 per Month for defendant and has tried to get her to come to New York so that she could be with him, but defendant refuses to live or to visit him in New York when he is in Port.

1V

That complainant obtained another leave in January, 1944, that gave him one day at home. When he got to Knoxville, complainant found his sister ~~in a serious condition~~ in a serious condition and obtained an extra day in order to give her a blood transfusion and defendant refused to spend the extra day with him.

V

That complainant obtained another leave in April 1944 and defendant spent two days with him. That during the leave complainant went to see his Grandmother who is quite old and defendant became very angry with him for doing so. During this visit complainant took the defendant and his sister to a movie. As they were leaving the movie complainant skipped playfully down the Street with his sister and defendant accused him of being ashamed of her and not wanting to be seen with her, and defendant refused to talk or speak to complainant on their way home.

That due to defendants living condition , which she refuses to change , complainant cannot see her or be with her when he gets the short leaves from the service to his Country and defendant refuses to make any plans to be with him when he gets such leaves and her only interest in complainant seems to be his allotment check . That defendants actions toward complainant has depressed him and caused him much mental anguish and defendant is guilty of such cruel and inhuman treatment as rendees co-habitation unsafe and improper.

Vll

There has been no children born as a result of said marriage of complainant and defendant.

Vlll

THE PREMISES CONSIDERED, COMPLAINANT PRAYS:

1st. That proper process issue to compel the defendant to appear and answer this bill, but her oath to her answer is waived.

2nd. That compâainant be granted an absolute divorce upon the grounds that defendant is guilty of such cruel and inhuman treatment or conduct, as rendees it unsafe and improper for complainant to co-habit with her and be under her dominion and control.

3nd. That he may have such further and other relief as the justice of his case may require.

Kenneth M. Graham
SOLICITOR

William Jackson Bryan

STATE OF TENNESSEE

COUNTY OF KNOX

WILLIAM JACKSON BRYAN, being duly sworn, makes oath that the facts stated in his foregoing bill are true, to the best of his knowledge and belief, that his complainant is not made out of levity or by collusion with the defendant, but in sincerity and truth, for the cause mentioned in this bill.

William Jackson Bryan

Sworn to and subscribed before
me this 10th day of October, 1944.

K. M. Graham

Notary Public

IN THE JUVENILE AND DOMESTIC RELATIONS COURT FOR KNOX COUNTY AT
KNOXVILLE, TENNESSEE.

WILLIAM JACKSON BRYAN,)
)
)
 - vs-)
)
)
WILMA TINDELL BRYAN)

Number _____

THE ANSWER OF
WILMA TINDELL BRYAN TO THE ORIGINAL DIVORCE BILL FILED AGAINST
HER IN THE ABOVE CAUSE.

Comes the defendant and for answer to so much of and such parts of said original bill as she is advised is material for her to answer, and without waiving any of her objections or exceptions as to said bill as to substance or form, but expressly reserving the same, says:

I.

Defendant admits the allegations contained in Section 1 of said bill.

II.

Defendant admits that prior to and since their marriage she has been employed in a private home, and she avers that she

now has the same job at the home of Mr. and Mrs. C. M. Beasley on Hyatt Road in Knox County, Tennessee, which is a respectable home, as well as a good and a Christian home, and when your defendant married the complainant, realizing that the complainant was then in the armed service of his country, she requested him to express his desire as to whether she should continue her said work and remain in said home, or what she should do, and it being agreeable with complainant for defendant to continue this domestic work, she has done so ever since, without objection on his part until some two months after their marriage, when he suggested that your defendant might go to New York City, New York and remain while the complainant was on voyage duty; and he also advised defendant that he had plenty of girl friends there that defendant could associate with, but since the complainant would be on duty and away from port for from a month to five months, this arrangement did not appeal to your defendant. At this time the defendant had no allotment, and these matters she will fully show at the hearing of the cause.

Defendant neither admits nor denies that she has shared a room in said home, but demands strict proof thereof, and she certainly resents any inference that she has been guilty of misconduct, as your defendant has been true to her marriage vows and she loves the complainant, is willing to live with him, and she avers that his suit is frivolous and without merit. She

avers that apparently the chief interest of the complainant is the allotment that your defendant receives, as he has requested part of the same, and has mentioned the same from time to time in one lot of letters which she has in her possession, instead of expressing affection and consideration toward your defendant in his correspondence.

That on one occasion he demanded one hundred dollars from your defendant, and also fifty dollars; he received said one hundred dollars, and then insisted on having the bank book to get the other fifty, but he did not receive this amount.

Defendant admits that in November 1943 the complainant had a leave with twenty-four hours to spend at home. Defendant denies that the complainant notified her that he had a leave to come home and advised her the time of his arrival in Knoxville. She avers that on said occasion she received a letter from the complainant in which he stated that he did not expect to get in at that time; however, later his stepmother notified your defendant that she had received a wire and that the complainant was coming and that it was a secret, as complainant's father had advised the stepmother not to tell your defendant about the same; so, under these circumstances and conditions, your defendant was not invited to go to the train with them, but is advised that he was met by some other parties. Defendant denies that she refused to come and be with the complainant, as charged in said bill, but what actually happened was, the complainant

stated that he was going to help his father kill hogs, and after the complainant explained that he was going to be busy, your defendant told him that she was also trying to help to get a Thanksgiving dinner for some special guests who were to be in the home where she worked, but she fully explained to the complainant that he was disappointed that he had not notified her that he was coming in ; however, defendant was anxious to see him, and about five-thirty p.m. they got together and went to his Aunt's home for Thanksgiving dinner, and then visited with the parents of the defendant, and then spent the night at the home of the parents of the complainant, and he left the next morning to return to his post.

III.

Defendant admits that the complainant provided an allotment for her under the Dependency Benefit Act, however it seemed to be more or less for his benefit, as he attempted to try to receive, or demanded same from time to time; and as to whether or not complainant tried to get defendant to come to New York and that she refused to visit or live with him in New York, she neither admits nor denies, but demands strict proof thereof, and she will show at the hearing of this cause that the complainant is not entitled to any relief.

VI.

Defendant admits that the complainant obtained a leave in January, 1944; however, it was not for one day, but two days,

and the defendant met him at the train, and she spent the first two days with him at his home; however the second day, the complainant did not spend much time around your defendant, nor did he give her much attention, as he was again busy killing hogs. She denies that the complainant's sister was in the hospital; however, she was sick and the complainant gave her a transfusion, at which time the complainant claimed an extra day by calling the Brooklyn Navy Yard, and your defendant had to return to her work, and after completing the day's work she talked to the complainant on the telephone and offered to spend the night with him, and he said it would be a trip for nothing, and after he took this attitude your defendant did not see him again before he left.

VII.

Defendant denies that the complainant obtained a leave in April of 1944 and that they spent two days together at that time; but apparently the complainant has in mind the leave that he obtained in May of 1944. Defendant admits that the complainant went to see his grandmother, all of which was agreeable with the defendant, and she denies that she became angry because he made said trip, but, as a matter of fact, your defendant requested his companionship, and asked that she be permitted to go along, but he refused. Defendant admits that when the complainant was in on this visit he took your defendant and his sister to a movie, and also, his father, his stepmother,

his sister. Defendant denies that the complainant skipped down the street, but he walked in an angry manner with his sister, and left your defendant behind, while it was raining, and showed her very little consideration and respect, particularly when he had come in on a furlough to see her; so this somewhat agitated and aggravated your defendant, and when they got home she asked him if he was ashamed of her, and didn't want to be with her, as your defendant was very much hurt over the attitude and conduct of the complainant on said occasion. Defendant denies that she refused to talk or speak to him on their way home, but she was hurt, embarrassed, and did not feel like giving voice to her actual feelings. Defendant denies that she has refused to change her living conditions, as she wants the companionship of the complainant, and is willing to live with him, if he wants to provide her with a home, but in view of the fact that he is in the service and in and out of port, she has felt like she ought to be near his people, and your defendant's people, here in Knoxville, where she is not associated with strange people in the absence of the complainant, she she verily believes that it is to her interest, as well as the complainant's, that she remain in the present environment here in Knoxville until he is discharged from the service; and she avers that he should not want to leave your defendant among strangers in a large city for periods of one month to five

months at a time. Defendant emphaticall denies that the complainant cannot see her or be with her, and she denies that she refuses to make any plans to be with him, because if the complainant would only notify your defendant as to when he was going to have a leave, she would certainly co-operate and seek his companionship in every way possible. She denies that she is just interested in his allotment check. She denies that she has depressed the complainant, or caused him mental anguish, or has been guilty of cruel treatment. She denies that she has been guilty of such cruel and inhuman treatment or conduct toward complainant as renders it improper and unsafe for complainant to cohabit with her; and she denies that he has ever been under her dominion and control.

It is true no children have been born to this marriage union.

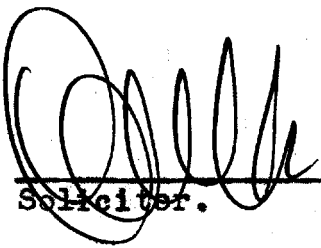
Defendant denies that the complainant is entitled to a divorce, or to any of the relief sought in said original bill.

And now, having answered said bill specifically, she generally denies each and every allegation of said original bill not heretofore admitted, explained or denied as fully as if specifically denied, and demands strict proof thereof, and asks that said original bill be hence dismissed with reasonable costs.

She avers further that your defendant has a very small income, and of course the allotment is not a large amount, and

because of her destitute circumstances that the complainant should be operated with the expenses of this suit, including a reasonable attorney fee for your defendant's solicitor of record in this cause, so that she may be amply able and in a position to properly defend said suit filed against her.

Wilma Tindell Bryan


Solicitor.


State of Tennessee,

County of Knox.

Wilma Tindell Bryan being duly sworn according to law made oath that the facts set forth in her foregoing answer are true to the best of her knowledge and belief.

Wilma Tindell Bryan

Subscribed and sworn to before me this the 19th day
of October, 1944.


Notary Public.

My Commission expires April 11, 1946.

WILLIAM JACKSON BRYAN

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* No.

VS

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IN THE DOMESTIC RELATIONS COURT

*

FOR KNOX COUNTY AT KNOXVILLE,

WILMA TINDELL BRYAN

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TENN.

TO THE HONORABLE HU B. WEBSTER, JUDGE:

THE CROSS-BILL OF WILMA TINDELL BRYAN:

Comes the defendant, Wilma Tindell Bryan, the defendant in the above cause, and with the permission of the Court files her cross-bill in the above cause, and respectfully shows to the Court as follows:

That the complainant, William Jackson Bryan, on the ____ day of _____, 1944, filed the original divorce bill in this cause against your defendant, Wilma Tindell Bryan, seeking a divorce from her, to which reference is here made. Thereafter your defendant filed her sworn answer to said original bill, denying the allegations in same, and denying that the complainant was entitled to relief, to which answer she here makes reference, and adopts any part or allegation or averment in her answer, as a part of this cross-bill, that may be material to the relief she seeks in this cause, and assuming the attitude of cross-complainant she avers that the cross-defendant, William Jackson Bryan, has been guilty of cruel and inhuman treatment, as hereinafter specifically alleged and set forth:

She avers that after their marriage, on about Sept. 1, 1943, at Knoxville, Tennessee, that the cross-defendant began to abuse and mistreat your cross-complainant in that about two months after their marriage, he began asking her for money out of her

allotment, when, as a matter of fact, your cross-complainant did not receive said allotment until about March of 1944, and all during their married life, cross-defendant has constantly harrassed your cross-complainant by asking her for money out of said allotment, and in November of 1943, he asked for \$75.00, and in February 1944 he called her on the telephone and wanted to know if the Allotment had come. Then he wrote her a letter in February 1944, advising her that he had borrowed \$100.00 from his father, and for her to repay same out of her allotment.

She avers that in Jan. of 1944, cross-defendant wrote her from Brooklyn, N. Y., telling her that she could come to New York and get a job, and that he had plenty of girl friends in New York that she could associate with, all of which plainly shows the attitude of cross-defendant in that he wanted your cross-complainant to go to work and contribute to his support.

That about November 25, 1943, the cross-defendant was here in Knoxville or Knox County, Tenn., for a day, and he told your cross-complainant that he did not know whether or not he loved her, and he said he was all mixed up, and she asked him if there was someone else, and he stated that he did not know, that there could be. That further in Jan. of 1944, he wrote her from Brooklyn, N. Y., and told her that he was still mixed up, and that he did love her but maybe not as much as he should. Thereupon in January of 1944, he was in Knoxville for about four days, and he was very indifferent toward her, spent most of his time doing things away from her, and at which time he had a two dollar bill which your complainant (cross) asked him for but he refused to give it to her, and your cross-complainant later learned that he gave same to his father, and he also had another two dollar bill which he also gave his father. That further he gave christmas presents to his parents, but did not give your cross-complainant anything for Christmas.

Cross-complainant further avers that in May of 1944, he requested her to give him some money, and she gave him \$100.00 of

her allotment money, and he refused to take your ^{com-}cross-complainant with him, but took or was with his aunt, leaving your cross-complainant at his mother's home. And he bought his father a hat later, when he took her and his family to town, and he paid \$10.00 down on a suit for his father, and requested your cross-complainant to pay the balance of \$14.50 out of her next allotment check. He also bought gifts for his sister, nieces and nephews, and presented them to said children from himself, and did not include or mention your cross-complainant in the matter, thereby displaying his inconsiderate attitude toward your cross-complainant. He did not even offer to buy your cross-complainant anything on said occasion until she asked him to get her an overnight bag, then he grumbled about it costing too much, and when he finally bought it and brought it to her, he set it down in the floor and did not even present it to her as a thoughtful husband should, and when your cross-complainant attempted to bestow her affections upon him by putting her arms around him, he was resentful and turned his face from her and showed that he did not care to accept her affection.

She avers that during their married life, he has been very abusive, mentally, in that he would order her around, and would leave her with his family while he went to have a good time, and he walked off on one occasion leaving her in a theatre, not even helping her with her coat, but walked out of the theatre with his sister, leaving your cross-complainant to get along the best she could and after they got into the car, cross-defendant dropped a cigarette and ordered your cross-complainant in a loud and vicious voice to pick it up, embarrassing and humiliating her in the presence of his family in said automobile in Knox County, Tenn. She avers that thereafter he acted indifferent toward your cross-complainant, and he ignored her, and thereafter he asked her for \$50.00, and when he did not get this money he was cold and indifferent toward her and two days later he took her to work which was in May of 1944, and left for Morristown to visit with his people and he has not lived with your cross-complainant since, nor has your cross-complainant seen him since. But on the other hand, he filed

3.

a bill for divorce against your cross-complainant making false and malicious statements about her without cause, all of which she charges herein as cruel and inhuman treatment.

She avers that about Jan. 1944, he called your cross-complainant on the telephone from Brooklyn, N. Y., and asked her to get her freedom.

That in October of 1944, he called your cross-complainant on the telephone and told her he was making arrangements to bring their marriage to an end, and he wanted her to promise to give him half of the money she had saved from her allotment and placed in the bank. And he also advised your cross-complainant that he wanted her to go with him to see his lawyer.

Cross-complainant avers that the cross-defendant has not corresponded with cross-complainant since May of 1944, and he has so conducted himself, showing that he has no consideration, respect or love for her, and by reason of which your cross-complainant is convinced that she can no longer live with him in any degree of happiness. She charges said conduct aforesaid both jointly and severally as constituting cruel and inhuman treatment. She avers that the cross-defendant has been guilty of such cruel and inhuman treatment or conduct toward cross-complainant as renders cohabitation unsafe and improper for cross-complainant to cohabit with cross defendant and be under his dominion and control.

Cross-complainant avers that she has been true to her marriage vows, gave cross-defendant no reason or cause for his said misconduct, nor has she condoned the same.

She avers that the citizenship and residence of the parties are in Knox County, Tenn., and the cross-defendant is temporarily in the Armed Forces of the United States.

No children have been born to this marriage Union.

Cross-complainant avers that by reason of the fact that the cross-defendant has wilfully abandoned your cross-complainant

and because of the destitute circumstances of your cross-complainant in that she only has a small income and wages, that he should be required to pay the necessary expenses of this suit, including a reasonable attorney's fee for her solicitor of record in this cause, and in view of the fact that he is trying to get rid of her without cause, he should certainly pay the expenses of this litigation herein.

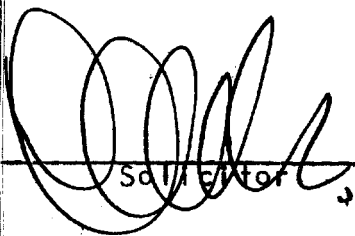
THE PREMISES CONSIDERED, CROSS COMPLAINANT PRAYS:

1. That your cross-complainant be permitted to file the cross-bill in this cause, and that proper process issue by subpoena and be served upon the cross-defendant, William Jackson Bryan, requiring him to appear and answer this bill, but his oath to his answer is waived.

2. That at the hearing, cross-complainant be granted an absolute divorce from cross-defendant, be granted the relief herein, and that her maiden name be restored to her.

3. That cross-defendant be required to pay into the Registry of this Court alimony pendente lite to take care of the necessary expenses and attorney's fees in this suit.

4. And that cross-complainant have such other, further and general relief as she may be entitled to on or before the hearing of this cause.



Plaintiff

William Jackson Bryan

STATE OF TENN.

KNOX COUNTY

WILMA TINDELL BRYAN, after being duly sworn according to law, makes oath that the statements made in her foregoing cross-bill are true to the best of her knowledge and belief, and those made upon information, she verily believes to be true, and that her complaint made in this cross-bill, ^{is not made out of levity or by collusion} but in sincerity and truth for the causes mentioned in this bill.

She further makes oath that owing to her poverty she is unable to bear the expense of the above styled cause of action for divorce by cross-bill, which she is about to commence in the Domestic Relations Court for Knox County, Tenn., and that she is justly entitled to the redress sought to the best of her belief.

Wilma Tindell Bryan

Subscribed and sworn to before me,
this 1st day of February, 1945.

Opal Longmire
Notary Public

My comm. expires July 14, 1947.

No. 494

IN THE DOMESTIC RELATIONS COURT
FOR KNOX COUNTY, TENN.

WILLIAM JACKSON BRYAN

-vs-

WILMA TINDELL BRYAN

ANSWER OF CROSS-DEFENDANT

Filed
March 15-1945
Kenneth Shivers
clerk

WILLIAM JACKSON BRYAN

I

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No. 494

- v -

I

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IN THE JUVENILE AND DOMESTIC

WILMA TINDELL BRYAN

I

RELATIONS COURT FOR KNOX COUNTY

*

AT KNOXVILLE, TENN.

THE ANSWER OF WILLIAM JACKSON BRYAN TO THE CROSS BILL FILED AGAINST
HIM IN THE ABOVE STYLED CAUSE

Comes the cross-defendant, William Jackson Bryan, and for answer to said cross-bill, says:

He admits his marriage and the residence of the parties but he denies that he has been guilty of such cruel and inhuman treatment or conduct toward cross-complainant as renders cohabitation unsafe and improper for cross-complainant to cohabit with cross-defendant, and be under his dominion and control.

That as to all other matters in said cross-bill, he neither admits nor denies, but demands strict proof thereof.

He waives his rights under the Soldiers' and Sailors' Civil Relief Act, and agrees that said case may be disposed of on its merits.

WILLIAM JACKSON BRYAN

By:

Kenneth M. Graham
His Attorney-at-Law

WILLIAM JACKSON BRYAN

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No. 494

*

-vs-

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IN THE JUVENILE AND DOMESTIC

*

RELATIONS COURT, KNOX COUNTY

WILMA TINDELL BRYAN

|

AT KNOXVILLE, TENN.

*

DECREE

This cause came on to be heard this 15th of March, 1945, before the Hon. Hu B. Webster, Judge, Juvenile and Domestic Relations Court for Knox County at Knoxville, Tennessee, upon the original divorce bill of the complainant, William Jackson Bryan, the answer and cross-bill of the defendant and cross-complainant, Wilma Tindell Bryan, and the cross-defendant's answer thereto, the entire record at large, and the oral testimony of witnesses examined in open Court; from all of which it satisfactorily appeared to the Court from the proof that the facts as charged in the original bill were not true, and that the same should be dismissed. However, the proof duly sustained the facts and allegations as charged in the cross-bill, and the cross-complainant, Wilma Tindell Bryan, was entitled to relief. And it appeared to the Court that the cross-defendant, William Jackson Bryan, has been guilty of such cruel and inhuman treatment or conduct toward the cross-complainant, Wilma Tindell Bryan, as renders cohabitation unsafe and improper for cross-complainant to cohabit with the cross-defendant, and be under his dominion and control.

The citizenship and residence of the parties are in Knox County, Tennessee, and although the cross-defendant is in the Military Service of the United States, he did not resist the granting of the relief sought by the cross-complainant.

It further appeared that the cross-complainant had been true to her marriage vows, gave the cross-defendant no reason or cause for his misconduct, nor did she condone the same.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED BY THE COURT, that the original bill of complainant, William Jackson Bryan, be, and the same is, hereby dismissed; It is further ordered, adjudged and decreed by the Court that on the Cross-bill, the bonds of matrimony subsisting between the cross-complainant, Wilma Tindell Bryan, and cross-defendant, William Jackson Bryan, be absolutely and forever dissolved, that the cross-complainant is granted an absolute divorce from cross-defendant and is restored to all the rights and privileges of an unmarried person, and her maiden name, Wilma Tindell, is restored to her.

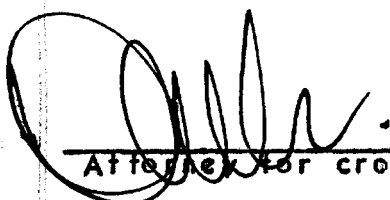
It is further ordered, adjudged and decreed by the Court that the cross-defendant pay to cross-complainant's solicitor of record in this cause, the sum of \$50.00, Attorney's fee, which amount has this date been paid, and no further order is necessary thereto.

It is ordered, adjudged and decreed by the Court that this decree is final in all respects, and the cost of the cause is taxed against the cross-defendant, for which execution may issue, and in the event all of said cost is collected from the cross-defendant, then the cross-complainant will be refunded her deposit in this cause.

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T
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R: Her B. White
JUDGE

3/17/59



Attorney for cross-complainant

Kenneth M. Graham
Attorney for cross-defendant