

CERTIFICATE

I, Peggy Preston, the Commissioner appointed by the Court and named
 in ~~the attached commission~~, or named by agreement of the parties, in that certain cause now pending in
Baldwin
 the Honorable Circuit Court of ~~Mobile~~ County, Alabama, Sitting in Equity, No. _____, wherein

JESSIE BRADFORD is Complainant, and WALTER A. BRADFORD

is Respondent, under and by virtue of the power conferred upon me by said Commission or agreement as
 such commissioner, caused JESSIE BRADFORD, and Myrtle L. Voit

are
 who were made known to me, to come before me at 3:00 o'clock P M., on October 1st,
19 58, at 65 St. Emanuel Street, Mobile, Alabama; that said witnesses were first duly sworn

by me as stated; that they were then examined by WILLIAM GRAYSON, Solicitor for the
COMPLAINANT, and ~~cross-examined by~~ _____

~~Solicitor for~~
~~Guardian Ad Litem &~~ _____, and they testified in
~~Attorney Ad Litem for~~

response thereto as is hereinabove written; and the testimony was by me reduced to writing as given
 by said witnesses in narrative form, and as near might be the identical language of said witnesses, and
 that, after said testimony had been so reduced to writing, it was by me read over to said witnesses; who
 assented to and signed same, ~~who refused to sign same, who was physically unable to sign same, or who~~
~~waived the reading and signing of same,~~ in my presence and in the presence of said Solicitor for

COMPLAINANT Solicitor for
 _____ and Guardian Ad Litem &
Attorney Ad Litem for _____

I further certify that I am not of counsel or kin to any of the parties to the said cause, and am not
 in anywise interested in the result thereof, and that the depositions are true and correct as given by
 the witnesses.

Witness my hand this 1st day of October, 19 58

Peggy Preston
 Commissioner

TESTIMONY OF JESSIE BRADFORD, WITNESS ON HER OWN BEHALF:

My name is Jessie Bradford and I am the Complainant in this cause. I am the wife of the Respondent and they were married to each other on October 2nd, 1952 in Rossville, Georgia. Both myself and the Respondent are each over the age of twenty-one years and both myself and the Respondent are bona-fide resident citizens of Mobile County, Alabama and have been such for more than one year next preceding the filing of the bill of complaint herein. There are no children as issue of our marriage. The Respondent has committed actual violence upon the person of the Complainant, attended with danger to my life and health or from his conduct there is reasonable apprehension of such violence being inflicted upon my person if I were to ever live with the Respondent again in any respect as husband and wife. It was because of the Respondent's extreme cruelty and abuse that I was forced to withdraw from his bed and board in July of 1958. We were living at 403½ Church Street at the time. Respondent has beat me on so many occasions that I cannot count the number. He has also slapped me on many different occasions. He has a violent temper and I am afraid of him. He has cruised me and has threatened to hurt me or even kill me on many and different occasions. I have been compelled to ~~live~~ live with him on many different occasions because of his extreme cruelty. I went back to him each time on promises that he would behave himself and would do better towards me. He never did. The last time that he beat me it was in July. At this time he beat me so badly that I had to lose time from work and I do not ever intend to live with him again.

Jessie Bradford

TESTIMONY OF MYRTLE L. VOIT, WITNESS ON BEHALF OF THE COMPLAINANT.

My name is Myrtle L. Voit and I have known both the Complainant and the Respondent in this cause since April of 1958. The Complainant is the wife of the Respondent and they were married to each other on October 2nd, 1952 in Rossville, Georgia. Both the Complainant and the Respondent are each over the age of twenty-one years and both the Complainant and the Respondent are bona-fide resident citizens of Mobile County, Alabama and have been such for more than one year next preceding the filing of the Bill of complaint herein. There are no children as issue of their marriage. The Respondent has committed actual violence upon the person of the Complainant, attended with danger to her life or health or from his conduct there is reasonable apprehension of such violence being inflicted upon the person of the Complainant if she were to ever live with the Respondent again. I have seen the Complainant with a bruised lip which was the result of the Complainant being beaten by the Respondent and I have seen other marks and bruises on her body which were caused by his being cruel to her. The Complainant withdrew from Respondent's bed and board in July because he beat her up so bad that she could not go to work. I have been present when the Respondent has cursed and abused the Complainant for nasty and vulgar names and I have also heard him make threats to do her bodily harm.

Myrtle L. Voit

JESSIE BRADFORD
No. _____ VS

Entered on _____
Min. Book No. _____ Entry _____
~~W. C. Liswell & Plaghton~~ Register

WALTER A. BRADFORD

ORDER OF SUBMISSION

This cause coming on to be heard, is submitted for decree on the pleadings and on the proof as noted.

Dated,

NOTE OF EVIDENCE

At the hearing of this cause the following note of evidence was taken to wit:

FOR COMPLAINANT

1. Bill of Complaint
2. Answer, Waiver and Agreement
3. Testimony of Jessie Bradford and of Myrtle L. Voit, witness on behalf of the Complainant.

FILED, 10-3-58
Deirdre A. [Signature] Register

William [Signature]
Solicitor—for Complainant

FOR RESPONDENT

Solicitor—For Respondent

JESSIE BRADFORD

Complainant

No.

Vs.

WALTER A. BRADFORD

Defendant

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

ANSWER AND WAIVER

Comes the defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegations of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

I further agree that Peggy Preston, may take the testimony in this cause without the issuance of a commission.

Walter A Bradford
Defendant

Complainant agrees that Peggy Preston, may take the testimony in this cause as commissioner, without issuance of a commission.

William Chapman
Selector for Complainant

NOTE: The space below is intended for "Agreements Between the Parties".

Complainant releases the Defendant from all daims of alimony and support, both temporary and permanent

Jessie Bradford
Complainant
William Chapman
Selector for COMPLAINANT

Walter A Bradford
DEFENDANT.

ATTEST:

- Mary Lee L. Vait*
- B. Ethel Jenkins*

STATE OF _____
COUNTY OF _____

I, _____, a NOTARY PUBLIC in and for said State and County, do hereby certify that _____, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, _____ executed the same voluntarily on the day same bears date.

Witness my hand and seal this _____ day of _____, 19_____.

NOTARY PUBLIC

Filed _____

STATE OF _____

COUNTY OF _____

Register

No. 4395

Vs.

ANSWER AND WAIVER

Filed,

FILED

, 19

OCT 13 1958

**ALICE J. DUCK, CLERK
REGISTER**

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JESSIE BRADFORD,
Complainant,

-vs-

WALTER A. BRADFORD,
Respondent.

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

NO. _____

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and
unto this Honorable Court as follows:

ONE

Complainant is the wife of the Respondent and they
were married to each other on October 2, 1952 in Rossville,
Georgia. Both the Complainant and the Respondent are each over the
age of twenty-one years and both the Complainant and the Respondent
are bona-fide resident citizens of the State of Alabama, County
of Mobile and have been such for more than one year next preceding
the filing of the bill of complaint herein. There are no
children as issue of their marriage.

TWO

The Respondent has committed actual violence upon the
person of the Complainant, attended with danger to her life or
health, or from his conduct there is reasonable apprehension of
such violence.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction
of this cause, will make the said Walter A. Bradford, party-
respondent hereto and will cause him to appear, plead, answer or
demur hereto within the time allowed by law and the rules of this
Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant her an absolute divorce from the bonds of matrimony with the Respondent, and Complainant further prays for such other, further and different relief as in equity she may be due, and as in duty bound she will ever pray, etc.

Filed
Oct 3, 1958
Elice J. Duck, Register

William Harper

SOLICITOR FOR COMPLAINANT.