

649

NELS P. CHRISTENSEN,
Complainant,

No. _____

vs.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

PEARL K. CHRISTENSEN,
Respondent.

BILL FOR DIVORCE

TO THE HONORABLE F. W. HARE, Judge of the Circuit Court of
Baldwin County, Alabama, Sitting in Equity:-

NELS P. CHRISTENSEN, Your Complainant, by this, his Bill of Complaint presented against PEARL K. CHRISTENSEN, the Respondent, respectfully shows:

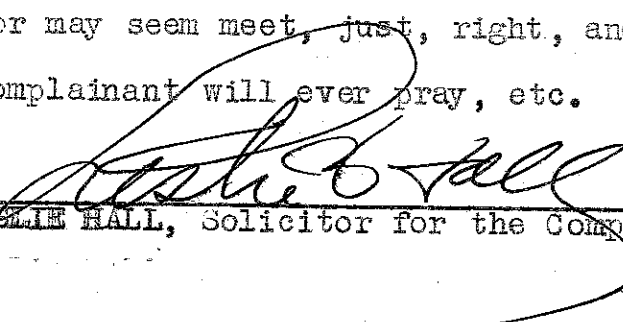
1. That Your Complainant is a resident of this State and County, and over the age of twenty one years.
2. That the Respondent is a non-resident of the State of Alabama, residing at 1019 Pacific Street, Vancouver, British Columbia, Canada, and is over the age of twenty one years.
3. That Your Complainant and the Respondent were married, to-wit: November, 1918, and lived together as husband and wife until, to-wit: June, 1930.
4. That Your Complainant has been a bona fide resident citizen of the State of Alabama for more than twelve months next preceding the filing of this Bill of Complaint.
5. That in, to-wit: June, 1930, the Respondent voluntarily abandoned the Complainant from his bed and board, without fault on the part of the Complainant, and has lived separate and apart from him for more than two years next preceding the filing of this Bill of Complaint.

THE PREMISES CONSIDERED, Your Complainant prays that the said PEARL K. CHRISTENSEN, whose address is 1019 Pacific Street, Vancouver, British Columbia, Canada, be made party Respondent to this Bill of Complaint, and that proper notice be served upon her, and that she be notified to answer within the time prescribed by law, and to abide by such orders as may be made in the premises.

Complainant further prays that upon the submission of this Cause, a decree may be rendered in his favor forever

divorcing him from the said PEARL K. CHRISTENSEN, the Respondent, and granting to each of the parties the right to re-marry should they so desire.

AND IF the Complainant has not asked for the proper relief, the premises considered, he prays that the Court may grant to him such further, additional, other, and different relief as to your Honor may seem meet, just, right, and proper, in equity; and Your Complainant will ever pray, etc.


LESLIE HALL, Solicitor for the Complainant.

NELS P. CHRISTENSEN,
Complainant,

vs.

PEARL K. CHRISTENSEN,
Respondent.

No. _____.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

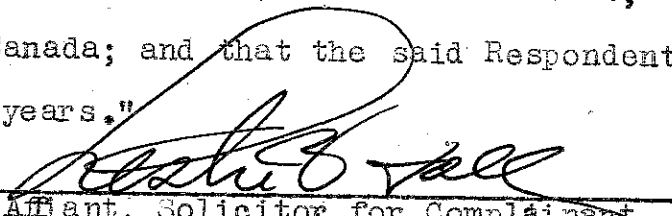
STATE OF ALABAMA

BALDWIN COUNTY

AFFIDAVIT OF NON-RESIDENCE OF RESPONDENT

Before me, Cornelia Hall, a Notary Public in and for said County in said State, personally appeared Leslie Hall, known to me, and who, being by me duly and legally sworn to tell the truth and nothing but the truth, deposes and says:

"That he is Solicitor of Record for NELS P. CHRISTENSEN, the Complainant in the above entitled cause. That he states on information and firm belief that the Respondent, Pearl K. Christensen, is a non-resident of the State of Alabama, and that her place of residence and address is 1019 Pacific Street, Vancouver, British Columbia, Canada; and that the said Respondent is over the age of twenty one years."


Affiant, Solicitor for Complainant.

Sworn to and subscribed before me this 16th day of July, 1940.


Notary Public, Baldwin County, Ala.

NELS P. CHRISTENSEN,
Complainant,

vs.

PEARL K. CHRISTENSEN,
Respondent.

No. _____

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

ANSWER AND WAIVER OF RESPONDENT

Comes Now PEARL K. CHRISTENSEN, Respondent in the above-styled cause, and for answer to the Bill of Complaint filed in said cause, says:

1. That she admits the allegations of Paragraph 1, of said Bill of Complaint, as to the residence of and age of the Complainant;

2. That she admits the allegations of Paragraph 2, as to the residence of and age of the Respondent;

3. That she admits the allegations of said Bill of Complaint as to the Marriage of the Complainant and Respondent;

4. That she denies each and every other allegation of said Bill of Complaint, separately and severally;

AND, she hereby expressly waives service of process, notice of demand for oral examination of Complainant's witnesses, notice of the issuance of Commission to take testimony, issuance of commission to take testimony, notice of the time and place set for taking same, and further that she waives the right to cross-examine Complainant's witnesses, and the right to introduce evidence in her own behalf; and she further agrees that the said cause may be submitted for final decree at any time on the pleadings and on the evidence of Complainant as noted by the Register or Complainant's Solicitor.

Signed this 27th day of July, 1940.

Pearl K. Christensen
Respondent.

Signed in the presence of:

[Signature]
2700, Commercial Ave
Vancouver, B.C.
Notary Public

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

NELS P. CHRISTENSEN,

Complainant

vs.

PEARL K. CHRISTENSEN,

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer and Waiver of Respondent 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 Defendant be, and the same are hereby, dissolved, and that the said NELS P. CHRISTENSEN is forever divorced from the said

PEARL K. CHRISTENSEN

for and on account of Voluntary Abandonment.

It is further ordered, adjudged and decreed that neither party to this suit shall again marry except to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixty days, neither party shall again marry except to each other during the pendency of said appeal.

It is further ordered that Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

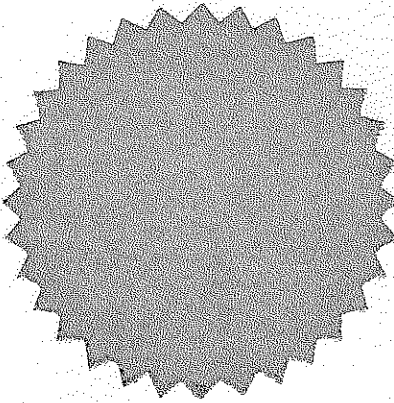
It is further ordered that NELS P. CHRISTENSEN, the Complainant, pay the cost herein to be taxed, for which execution may issue.

This 10th day of August, 1940.

J. W. Hare

Judge Circuit Court, in Equity.

I, _____, Register of the Circuit Court for Baldwin County, Alabama, do hereby certify that the foregoing is a correct copy of the original decree rendered by the Judge of the Circuit Court in the above stated cause, which said decree is on file and enrolled in my office.



Witness my hand and seal this the _____ day

of _____, 19____

Register of Circuit Court, in Equity.

Eq. No. _____

RECORDED

NELS P. CHRISTENSEN,
Complainant,

vs.

PEARL K. CHRISTENSEN,
Respondent.

AFFIDAVIT OF NON-RESIDENCE OF
RESPONDENT.

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

Filed in office this 16

day of July, 1940.

R. R. Duck
As Register.

Eq. No. RECORDED

NELS P. CHRISTENSEN,
Complainant,

vs.

PEARL K. CHRISTENSEN,
Respondent.

ANSWER AND WAIVER OF

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed in office this 31
day of July, 1940.

R. S. Dick
As Register.

No. 649 Page

The State of Alabama
Baldwin County

In Circuit Court, In Equity

WELLS P. CHRISTENSEN

vs. Complainant.

PEARL K. CHRISTENSEN,

Respondent.

DIVORCE DECREEE

Filed August 12, 1940
P. S. Duvall, Register

RECORDED

THE STATE OF ALABAMA }
Baldwin County

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

NELS P. CHRISTENSEN, COMPLAINANT

VS.

PEARL K. CHRISTENSEN, RESPONDENT

I, _____

as ~~Register and~~ Commissioner _____

have called and caused to come before me Nels P. Christensen, the Complainant,
and Alfred M. Neumann,

witnesses named in the Requirement for Oral Examination, on the 9th day of August
1940, at the office of Probate Judge

in Bay Minette, Alabama, and having first sworn said witness to to speak the truth,
the whole truth, and nothing but the truth, the said Nels P. Christensen,

doth depose and say as follows:

I am the Complainant in this case. I am 48 years of age, and live at Elberta, ^{Baldwin County} Alabama, where I have been a bona fide resident citizen since 1928.

The respondent is a non-resident of the State of Alabama, and resides at 1019 Pacific Street, Vancouver, British Columbia, Canada, and she is about 40 years of age. She and I were married in November, 1918, and lived together as husband and wife until sometime in June, 1930, when she voluntarily left me, without fault on my part. She has been living separate and apart from me since that time. When I moved to Alabama, she did not want to come, and left stating that she would not live down here with me. I have tried to get her to come back, but she would not.

(Signed): Nels P. Christensen
Complainant.

And the said Alfred M. Neumann, on oath to speak the truth and nothing but the truth, deposes and says: My name is Alfred M. Neumann. I am 34 years of age. My occupation is Banker, and I live in Elberta, Baldwin County, Alabama. I have known Nels P. Christensen for 10 years, and have seen him often during that time. His wife, Pearl K. Christensen, has not lived with him since the summer of 1930. He has been a bona fide resident citizen of Baldwin County, Alabama, for the last ten years, at least, and he is over 21 years of age.

(Signed): Alfred M. Neumann

ORAL EXAMINATION

I, J. J. Masliburn, Jr., as Register and Commissioner hereby certify that the foregoing deposition s 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 _____

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 9th day of August, 1940.

J. J. Masliburn, Jr. (L. S.)
As Commissioner.

No. 649 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Nels P. Christensen,

Complainant

Vs.

Peerl K. Christensen,

Respondent

ORAL DEPOSITION

Filed Aug 9, 1940

[Signature] Register

RECORDED IN

Record

Vol. _____ Page _____

Register

57427

Eq. No. 649

RECORDED

NELS P. CHRISTENSEN,
Complainant,

vs.

PEARL K. CHRISTENSEN,
Respondent.

BILL OF COMPLAINT FOR DIVORCE

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed in office this

16th day of July, 1940.

R. Duck
As Register.

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. 649 August Term, 1934

NELS P. CHRISTENSEN, Complainant

Vs.

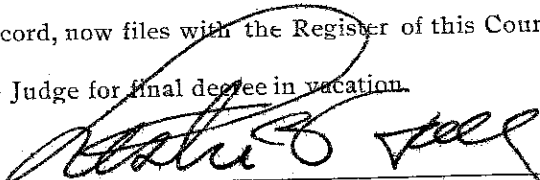
PEARL K. CHRISTENSEN, Defendant

To R. S. Duck, Register :

answer & waiver filed by

In the above stated cause ~~an 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~~ evidence in same being waived, / defense having been interposed, / the Complainant, by Leslie 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.


Solicitor for Complainant.

NELS P. CHRISTENSEN,

Complainant,

vs.

PEARL K. CHRISTENSEN,


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 Nels P. Christensen and of Alfred M. Neumann, for
the Complainant, Request for Decree in Vacation, by Leslie Hall,
Solicitor for the Complainant,

and in behalf of Defendant upon ~~Answer and waiver of right to submit evidence.~~


Solicitor for Complainant. Register X

RECORDED

No. 649

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

NELS P. CHRISTENSEN,

Complainant,

vs.

PEARL K. CHRISTENSEN,

Respondent.

**NOTE OF ~~TESTIMONY~~
Submission.**

Filed in Open Court this 9th

day of August 1940

R.S. Dorch

REGISTER

RECORDED

No. 649

Page _____

The State of Alabama,

Baldwin County.

CIRCUIT COURT, IN EQUITY

NELS P. CHRISTENSEN,

Complainant,

Vs.

PEARL K. CHRISTENSEN,

Respondent.

**REQUEST FOR DECREE IN
VACATION**

Filed August 9, 1940

R. S. Duch

Register.

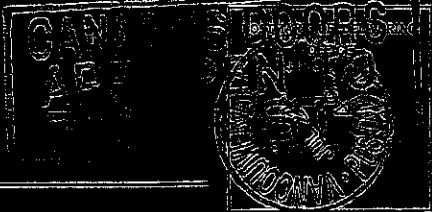
Recorded in _____ Record

Vol. _____ Page _____

Register.

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