

THE STATE OF ALABAMA }  
Baldwin County

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

MARTHA SIMS

COMPLAINANT

vs.

RALPH SIMS

RESPONDENT

I, Frances Brantley

as Register and Commissioner

have called and caused to come before me Martha Sims and Lee Parker

witness<sup>es</sup> named in the requirement for Oral Examination, on the 25th day of September

1941, at the office of BEBBE & HALL, LAWYERS

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 MARTHA SIMS

doth depose and say as follows:

My name is Martha Sims. I am a resident of Fairhope, in Baldwin County, Alabama, and over twenty-one years of age.

The Respondent, Ralph Sims, is over twenty-one years of age and a resident of Fairhope, in Baldwin County, Alabama.

The Respondent, Ralph Sims, and I were married on January 7, 1935, in Pensacola, Florida. We were at that time both residents of Baldwin County, Alabama, and have been continuously until this time.

The Respondent and I lived together as husband and wife, in Baldwin County, Alabama, until on, to-wit, September 1, 1940. The Respondent is a man of terrible temper. On September 1, 1940 and at many times prior thereto the Respondent, Ralph Sims cursed, threatened and abused me and on several occasions did actual violence to my person by striking me. Some time just before I was forced to leave the Respondent, he came in and struck me about the body and in the face with his fist. The blow was of sufficient force to cause me to see stars. This was merely a recurrence of what had gone on several times before. The conduct of the Respondent and his abuses were of such to render it absolutely impossible for me to live with him as his wife. His conduct was such as to cause me every reasonable apprehension to believe and I did actually believe that if I continued to live with his, as his wife, he would carry out his threats and continue to do violence to my person which would necessarily endanger my life and health.

The Respondent worked very little while we lived together as husband and wife, and many times I was forced by him to give him spending money and also provide him with food and also his tobacco and other minor necessities.

We have one child, a minor, now five years old, Charles Alvin Sims, who is now and has been all of his life with me. I have necessarily, in veiw of the fact that the Respondent did not work, had to work and support myself and the child.

The Respondent is a man 34 years of age and has no property and no home of his own. He is entirely dependant upon his daily labor, and does very little of that. I feel that I am capably and able to support the child and am willing and

I, Frances Brantley 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 Mr. Hubert M. Hall 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 25th day of September 1941.

Frances Brantley (L. S.)

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

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**IN CIRCUIT COURT, IN EQUITY**

COMPLAINANT

VS.

RESPONDENT

**ORAL DEPOSITION**

Filed October 3, 1941

R. S. Muck, Register.

RECORDED IN

Record

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

Register

and have assumed the responsibility of caring and providing for him.

The Respondent has no home and no place to take care of the child and is not a suitable or capable person or having the care, support and rearing of said minor child.

Martha Sims

LEE PARKER, A WITNESS FOR THE RESPONDENT, CROSS-COMPLAINANT, MARTHA SIMS, HAVING BEEN BY ME FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Lee Parker. I live at Fairhope, in Baldwin County, Alabama. I am personally acquainted with the Respondent, Martha Sims, and the Complainant, Ralph Sims, and have known them for the past fifteen or twenty years. While the Complainant and the Respondent were living together as husband and wife, I had occasion to see and observe them and I know of my own personal knowledge that the said Ralph Sims often abused and mistreated the said Martha Sims and it is generally known in the community that he abused her and often did violence to her person, which would necessarily endanger her life and health.

I know of my own personal knowledge that it was absolutely impossible for the said Martha Sims to live with Ralph Sims, as his wife.

Lee Parker

*Exhibit*

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

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**IN CIRCUIT COURT, IN EQUITY**

COMPLAINANT

VS.

RESPONDENT

**ORAL DEPOSITION**

Filed October 3, 1941

R. S. Auch, Register.

RECORDED IN

Record

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

Register



RALPH SIMS,

Complainant,

VS.

MARTHA SIMS, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

TO RALPH SIMS:

Take notice that the Respondent-Cross Complainant, Martha Sims, has this day filed an application to have examined orally before Frances Brantley, commissioner appointed by this court, the following named witnesses, all of whom reside at Fairhope, in Baldwin County, Alabama, to-wit: Martha Sims and Lee Parker; and further that an order has this day been made allowing the said examination of the said witnesses as applied for, and that the same will be had in the office of the Register in Chancery in the Court house in Bay Minette, Baldwin County, Alabama, the 25th day of September, 1941, at 2:30 P. M. You may attend if you wish to do so.

Witness my hand this 12<sup>th</sup> day of September, 1941.

R. S. Puck

RALPH SIMS,

Complainant,

VS.

MARTHA SIMS, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

The Respondent - Cross Complainant, Martha Sims, having this day filed her application in writing to have the testimony taken orally of Martha Sims and Lee Parker who reside at Fairhope, in Baldwin County, Alabama, within 100 miles of Bay Minette, Alabama and said Respondent - Cross Complainant in said application nominated Frances Brantley to take such testimony as provided by law. It is ordered by the Register that said witnesses be examined orally before said commissioner in the Court House of Baldwin County, Alabama, after three days notice of the time and place of taking same has been given the Complainant - Cross Respondent, Ralph Sims, by recording on the order book of the Register of Baldwin County, Alabama.

Witness my hand this 12<sup>th</sup> day of September, 1941.

*R. S. Deneb*

Register of Baldwin County, Alabama.

RALPH SIMS,

Complainant,

vs.

MARTHA SIMS, ET AL.,

Respondents.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

TO RALPH SIMS:

Take notice that the Respondent-Cross Complainant, Martha Sims, has this day filed an application to have examined orally before Frances Brantley, commissioner appointed by this court, the following named witnesses, all of whom reside at Fairhope, in Baldwin County, Alabama, to-wit: Martha Sims and Lee Parker; and further that an order has this day been made allowing the said examination of the said witnesses as applied for, and that the same will be had in the office of the Register in Chancery in the Court House in Bay Minette, Baldwin County, Alabama, the 25th day of September, 1941, at 2:30 P. M. You may attend if you wish to do so.

Witness my hand this \_\_\_\_\_ day of September, 1941.

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RALPH SIMS, COMPLAINANT-CROSS RESPONDENT,

VS.

MARTHA SIMS, ET AL, RESPONDENT-CROSS COMPLAINANT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

And now comes the Respondent-Cross Complainant, MARTHA SIMS, by Boothe & Hall, her solicitors of record, and makes application to the Register of said Court to issue a commission to take the testimony of said cause in oral examination of the following witnesses, who reside at Fairhope, in Baldwin County, Alabama, to-wit: Martha Sims and Lee Parker.

And the Respondent-Cross Complainant, suggests the name of Frances Brantley, who resides at Bay Minette, Baldwin County, Alabama, as a suitable person to be appointed commissioner to take the testimony of said witnesses.

This the 11th day of September, 1941.

*Boothe & Hall*  
Solicitors for Respondent-Cross Complainant

*Richard P. Boothe*

*Handwritten notes and signatures on the right margin.*

*Richard G. Demaree*

CONFIDENTIAL - FEDERAL BUREAU OF INVESTIGATION

*CONFIDENTIAL*

*Filed September 18, 1944  
R.S. Arndt, Register*

INTRODUCTION  
The following information is being furnished to you for your information and is not to be disseminated outside your agency.  
The information is being furnished to you for your information and is not to be disseminated outside your agency.  
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CONFIDENTIAL - FEDERAL BUREAU OF INVESTIGATION  
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CONFIDENTIAL - FEDERAL BUREAU OF INVESTIGATION

IN WASHINGTON  
EVIDENCE CONTROL UNIT  
IN THE DISTRICT OF COLUMBIA

RALPH SIMS, COMPLAINANT-CROSS RESPONDENT,  
VS.  
MARTHA SIMS, ET AL, RESPONDENT-CROSS COMPLAINANT.)

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

And now comes the Respondent-Cross Complainant, MARTHA SIMS, by Beebe & Hall, her solicitors of record, and makes application to the Register of said Court to issue a commission to take the testimony of said cause in oral examination of the following witnesses, who reside at Fairhope, in Baldwin County, Alabama, to-wit; Martha Sims and Lee Parker.

And the Respondent-Cross Complainant, suggests the name of Frances Brantley, who resides at Bay Minette, Baldwin County, Alabama, as a suitable person to be appointed commissioner to take the testimony of said witnesses.

This the 11th day of September, 1941.

*Beebe & Hall*

Solicitors for Respondent-Cross Complainant

708

Request for Fobing  
of Justice

RECORDED

Filed September 13, 1941  
R.S. Arch, Register

RALPH SIMS, Complainant, Cross-  
Respondent.

VS.

MARTHA SIMS, Respondent, Cross-  
Complainant.

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, Respondent,~~  
~~Cross-Complainant, upon the Answer and Cross Bill, decree pro confesso on~~  
~~personal service against the Complainant, Cross-Respondent, Request for taking~~  
~~testimony and Appointment of Commission, Commission issued to Frances Brantley,~~  
~~Notice of taking testimony of Complainant's witnesses, Notice of time of taking~~  
~~testimony, and Testimony of MARTHA SIMS and LEE PARKER .~~

~~and in behalf of Respondent, Cross-Complainant, upon the Answer and Cross Bill, decree pro confesso on~~

*R. L. Duck*

Register.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,  
Baldwin County.

} NO. \_\_\_\_\_ TERM, 194 \_\_\_\_\_

RALPH SIMS,  
Complainant—  
Cross-Respondent.

VS.

MARTHA SIMS,  
Respondent—.

TO R. S. DUCK, REGISTER:

In the above stated cause a DECREE PRO CONFESSO ON PERSONAL SERVICE  
having been against the Complainant, Cross-Respondent ~~the Respondent~~,  
and evidence having been taken, and the cause being ready for submission for final decree, and  
no defense having been interposed, the complainant—, by BEEBE & HALL,  
Solicitor<sup>s</sup> 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.

Beebe & Hall.  
Solicitor<sup>s</sup> for Complainant—.

The State of Alabama, }  
BALDWIN COUNTY.

No. 798 ..... CIRCUIT COURT IN EQUITY.

RALPH SIMS, ..... Cross-Respondent & Complainant.....

vs.

MARTHA SIMS & C. A. BOWMAN, Cross -Complainant& Defendant.....

Motion is hereby made for a Decree Pro Confesso against Ralph Sims, Complainant, .....  
and Cross-Respondent, ..... Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of ~~summons~~ Cross Bill upon said Respondent, ..... Respondent  
Defendant.....; and that said summons was duly served according to law, and that said Defendant..... ha.S.... failed

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

This 8th ..... day of September, 1941. 192.....

*Beber*  
.....  
*g. Hunter* Solicitor.

Ralph Sims, Cross-Respondent  
& Complainant,  
Vs. Martha Sims & C. A. Bowman,  
Respondent. &  
Cross-Complainant

In the Circuit Court.  
In Equity No. 708.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Cross-  
Respondent  
Ralph Sims

Answer & Cross-Bill filed and copy to Ralph Sims, April 22, 1941,  
by the Sheriff of \_\_\_\_\_ County, on the \_\_\_\_\_ day of \_\_\_\_\_,  
194\_\_\_\_\_.

And it further appears to the Register, that the said \_\_\_\_\_  
Ralph Sims,

\_\_\_\_\_, Cross Respondent, having to the date hereof,  
failed to plead, demur to or answer the Cross Bill of Complaint filed in this cause, it is now, therefore,  
on motion of Beebe & Hall, by H. M. Hall, Solicitors  
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,  
and it hereby is, in all things taken as confessed against the said \_\_\_\_\_  
Ralph Sims,

This 8 day of Sept, 1941.

R. S. Durb  
Register.



RECORDED

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

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

vs.

**NOTE OF TESTIMONY**

Filed in Open Court this 3<sup>rd</sup>

day of October 1941

REGISTER

RECORDED

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

STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT, IN EQUITY.

Vs.

MOTION FOR DECREE PRO  
CONFESSO ON PERSONAL SERVICE

Filed *September 7,* 19*11*

*R. S. Deeb*

Register.

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

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

Register.

NO. \_\_\_\_\_

Complainant—

VS.

Respondent—

**Request For Decree In Vacation**

Filed October 3, 1941

P. S. Church

Register.

**RECORDED**

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

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

Complainant,

Vs.

Respondent.

**DECREE PRO CONFESSO ON  
PERSONAL SERVICE.**

Issued this 8 day of Sept.

194 ~~7~~ \_\_\_\_\_

*A. S. Duck*

Register.

RALPH SIMS,  
Complainant.

v.

MARTHA SIMS, ET AL,  
Respondents.

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

Comes Richard J. Demeree, Attorney for Complainant and moves the court that his name be withdrawn as Attorney of record in the above styled cause.

*Richard J. Demeree*

*Handwritten notes:*  
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COMMISSIONER OF  
SOLICITOR GENERAL  
DEPARTMENT OF JUSTICE

RECORDED

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

To Any Sheriff of the State of Alabama—GREETINGS:

WE COMMAND YOU, That you summon MARTHA SIMS AND C. A. BOWMAN

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 RALPH SIMS

against said MARTHA SIMS AND C. A. BOWMAN

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, R. S. Duck, Register of said Circuit Court, this XI 31st day of March, 1941.

R. S. Duck, Register

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

Ralph Sims  
Complainant

vs

Martha Sims and  
C. A. Bowman  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY ALABAMA  
IN EQUITY

NO. \_\_\_\_\_

TO THE HONORABLE JUDGE HARE, JUDGE OF SAID COURT IN EQUITY.

Now comes your Complainant, Ralph Sims and respectfully exhibits this his Bill of Complaint against Martha Sims, his wife and C. A. Bowman, his father in law, Respondents and shows unto your Honor as follows:

ONE: Your Complainant is a married man over the age of twenty-one and the two Respondents are likewise over the ages of twenty-one. Both the Complainant and the Respondents are residents of Baldwin County Alabama.

TWO: The Complainant avers that he provided and now does provide a home for his wife one of the aforesaid Respondents and that all times he has offered to maintain and support her. Complainant avers that there has been born to them one child Charles Alvin Sims and that said child is now 4 years of age.

THREE: Complainant avers that his wife, Martha Sims left his home and refused his support without legal cause and took with her their infant child and placed the child in the home of the father-in law Respondent C. A. Bowman about six months ago and since that time both Respondents have refused to allow Complainant to see his child, or come near to the house and that for this reason has been deprived of the rights to support his child and to enjoy the company of said child.

PRAYER FOR PROCESS

Your complainant prays your honor to grant him all appropriate and legal process and that the same be directed to the said Martha Sims and C A Bowman Respondents, commanding them to appear before your Honorable Court within the time required by law, and to then and there answer fully and completely the several paragraphs of this Bill of Compl

RALPH SIMS,  
Complainant,  
VS.  
MARTHA SIMS, ET AL.,  
Respondents.

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

And now come the Respondents, separately and severally, and for answer to the Complainant's complaint and to each count thereof, separately and severally, say:

FIRST:

That they deny each and every allegation therein contained not herein specifically admitted and demand strict proof of the same.

SECOND:

They admit that the Complainant is a married man, over the age of twenty-one years, and that the Respondents are over the age of twenty-one years, and that all are residents of Baldwin County, Alabama.

THIRD:

They deny that the Complainant provided or does now provide a home for his wife and has offered to maintain and support her; they admit that there was born to the Complainant, Ralph Sims, and the Respondent, Martha Sims, a child, Charles Alvin Sims, who is now four years old.

FOURTH:

They deny the allegations contained in Paragraph Three and demand strict proof of the same.

AND FOR FURTHER ANSWER TO THE COMPLAINANT'S BILL OF COMPLAINT, and praying that this may be taken as her cross bill, the Respondent, Martha Sims, respectfully represents and shows unto your Honor and this Honorable Court as follows:

A: That she and the Complainant, Ralph Sims, are both over the age of twenty-one years and residents of Baldwin County, Alabama.

B: That the said Ralph Sims and Martha Sims are husband and wife, having married on January 7th, 1935, and lived together as husband and wife, in Baldwin County, Alabama.

C: That on to-wit, September 1st, 1940, the said Ralph Sims cursed, threatened and abused her and did actual violence to her person by striking her several times; that on several occasions prior to said date, the said Ralph Sims



threatened and abused her and did violence to her person by striking her; that the conduct of the said Ralph Sims is such as to cause her to have every reasonable apprehension to believe and she does actually believe that if she continues to live with him, he will do further violence to her person, which will necessarily endanger her life and health; that he has failed and refused to support her and their minor child.

D: There was bornto said marriage between her and the Complainant, Ralph Sims, one child, a minor four years old; Charles Alvin Sims, who is now and has been all of his life with her, and she has been called upon to support herself and said minor, and for the past years the said Ralph Sims has contributed very little, if anything, toward her support and the support of the said minor child, but to the contrary has failed to support them and he has, upon the refusal of her to furnish him with spending money, threatened, abused and done violence to her, which necessarily endangered her life and health.

E: That she has no means of support for herself and her minor child, except by her daily labor; that the said Ralph Sims is an able-bodied man, able and capable of supporting her and the said child; that he is not a suitable, fit or proper person to have the care, custody and control of said minor; that she is ready, able, willing and capable of caring for and supporting said child.

WHEREFORE, the premises considered, the said Martha Sims praysthat this may be taken as her cross bill, and that the said Ralph Sims be made a party respondent hereto and required to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court; that your Honor will order a reference to determine a reasonable alimony, pendente lite, to be paid by the said Ralph Sims to her and also a reasonable attorney's fee to be paid to her by the said Ralph Sims.

The Respondent and Cross-Complainant, Martha Sims, further prays that upon a final hearing hereof, this Honorable Court will award to her a divorce, forever barring the bonds of matrimony existing between her and the said Ralph Sims; that a further decree be made awarding to her such permanent alimony as to your Honor may seem mete and proper, and also the care, custody and control of said minor child; Charles Alvin Sims, be awarded her; that this Honorable Court will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL,

By: *W. H. Hall*  
Solicitors for Respondent.

Ralph Sims, Complainant,

vs

MARTHA SIMS, ET AL, Respondents

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY NO. 708.

This cause coming on to be heard is submitted on the original bill of Complaint on behalf of the Complainant and cross bill, decree pro confesso against the Complainant and testimony as noted by the Register on Behalf of the Respondent, and the court after due consideration is of the opinion that the Complainant is not entitled to the relief prayed for in the original Bill of Complaint, but that the Respondent is entitled to the relief prayed for in her cross bill.

IT IS THEREFORE ORDERED, ADJUDGED, DECREED by the Court that the bonds of matrimony heretofore existing between the Respondent, Martha Sims and the Complainant, Ralph Sims, be, and the same are hereby dissolved, and the Respondent, Martha Sims, is forever divorced from the Complainant, Ralph Sims.

IT IS FURTHER ORDERED that the Respondent, Martha Sims be, and she is hereby permitted to again contract marriage upon the payment of the costs in this cause.

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

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent, Martha Sims, be and she is hereby awarded the custody of the minor child, Charles Alvin Sims.

it is further ordered that the said Martha Sims shall pay the costs in this cause.

Dated at Monroeville, Monroe County, Alabama, this 4th. day of Oct., 1951.

RE. W. HARR  
Judge of Circuit Court, Baldwin  
County, Alabama

RALPH SIMS, Complainant,  
VS.  
MARTHA SIMS, ET AL, Respondents.

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

This cause coming on to be heard is submitted on the original Bill of Complaint on behalf of the Complainant and cross bill, decree pro confesso against the Complainant and testimony as noted by the Register on behalf of the Respondent, and the court after due consideration is of the opinion that the Complainant is not entitled to the relief prayed for in the original Bill of Complaint, but that the Respondent is entitled to the relief prayed for in her cross bill.

IT IS THEREFORE ORDERED, ADJUDGED, DECREED by the Court that the bonds of matrimony heretofore existing between the Respondent, MARTHA SIMS and the Complainant, RALPH SIMS, be, and the same are hereby dissolved, and the Respondent, MARTHA SIMS, is forever divorced from the Complainant, RALPH SIMS.

IT IS FURTHER ORDERED that the Respondent, MARTHA SIMS be, and she is hereby permitted to again contract marriage upon the payment of the costs in this cause.


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

IT IS FURTHER ORDERED, ADJUDGED and DECREED that the Respondent, MARTHA SIMS, be and she is hereby awarded the custody of the minor child, CHARLES ALVIN SIMS.

IT IS FURTHER ORDERED that the said MARTHA SIMS shall pay the costs in this cause.

Dated at Monroeville, Monroe County, Alabama, this 4<sup>th</sup> day of Oct.

1941.

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



Received in Sheriff's Office  
this 31 day of March, 1941  
W. R. STUART, Sheriff

RECORDED 798

Bill of Complaint

Executed this 3 day of April, 1941

By ~~James H. ...~~ Attorney

copy of William

Severance Complaint

Walter Perry, et al. vs. ...

W. R. Stuart  
Sheriff

D.S.

W. R. Stuart

the care of the child. ...  
Complaint ...  
D.S.

Ralph Sims

vs

Walter Perry and  
C. A. Bowman

Complaint ...  
D.S.

Filed March 31, 1941  
R. S. ...

Complaint

Collector for Complaint

FOOTNOTES: The Respondent is ...  
allegation in the foregoing bill of complaint, paragraph one  
to three thereof, both inclusive but not under each, each  
thereof being expressly waived.

Complaint

Collector for Complaint

State of Alabama  
County of Baldwin  
Ralph Sims, being duly sworn, says that he is the  
Complainant whose name is subscribed thereto; that he has  
read the above bill of complaint and knows the contents  
thereof; that the bill of complaint is true to his own knowledge  
except as to matters stated upon information and belief which  
he verily believes to be true.

Complaint

Subscribed and sworn to before me this 31 day of March, 1941.

Collector for Complaint