The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Doroth	ıy B. Wade	, Complainant
	vs.	
Junius	L. Wade	. Respondent
	•	
990 a a 8 a 4 a a a 2 a 9 mg a 99		Bill of Complaint, Decree Pro Confesso
		as noted by the Register, and upon
		ourt that the bonds of matrimony hereand the same are hereby, dissolved, and
that the said Dorothy B.	Wade	is forever divorced from the
said Junius L. Wa	ade fo	or and on account of
Volu	untary Abandonment	
It is further ordered, ad	djudged and decreed th	ast Complainant may resume the
ase of her former name, Dorot	thy B. Hill,	
		The second secon
It is further ordered that the Congain contract marriage upon the payout the payout the further ordered that	Complainant and Respondent ment of the cost of this suit	
	30000	Judge Circuit Court, In Equity.
-)		Register of the Circuit
f	foregoing is a correct copy	Alabama, do hereby certify that the of the original decree rendered by the the above stated cause, which said demy office.
	Witness my hand and	seal this theday
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Complainant

VS.

Respondent

DIVORGE DEGREE

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DOROTHY B. WADE

COMPLAINANT

Circuit Court

Baldwin County

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Alabama

JUNIUS L. WADE

RESPONDENT

IN EQUITY

To The Honorable Telfair J. Mashburn, Jr., Judge of said Court, sitting in Equity:

Comes Dorothy B. Wade and exhibits this, Her Bill of Complaint against Junius L. Wade, and shows unto Your Honor as follows:

First: Complainant, whose age is 32 years, and Respondent, whose age is 27 years, intermarraed on April 3rd 1948 in South Hampton County, Virginia.

Second: Prior to said marriage, Complainant was a resident of Baldwin County, Alabama, and, subsequent to the acts complained of herein, she resumed her residency in said Baldwin County and has continued so till the present date, being since since February 20th 1949.

Third: Between Jamuary 1st and January 10th 1949, Respondent voluntarily abandoned Complainant and has continued said abandonment with total neglect of the marital covenant on his part ever since.

The premises considered, Complainant prays that said Junius L. Wade be, by proper and appropriate legal process, made party Defendant hereto and that he be required to answer, plead or demur to the Bill of Complaint within the time prescribed by law and the rules of Your Honorable Court and that he be compelled to abide and obey any and all decrees and orders made in the premises.

Further, Complainant prays, upon a hearing of the within cause, that a decree be ordered and entered forever divorcing her from Respondent and granting her such other, further and different relief as, to Your Honor, may appear meet and proper.

Solicitor for Complainant

Respondent resides: R. F. D., Zuni, Virginia.

Service by registered mail.

The South St. William San San St. St. St. St.

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ALUKE J. DUCK, Register

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B.	ALDWIN COUNTY	} No		TERM, 19
to any sheri	FF OF THE STATE OF	ALABAMA:		
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You Are Hereby	Commanded to Summo)n		
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to appear and p	lead, answer or demur,	within thirty days	from the service	hereof, to the complaint filed i
· .				, Defendant
by				
		-		, Plaintiff
	this			

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Vs.	Plaintiffs	1 # \$W 5 5.				, 19
Junis	L. Wade	by l	eaving	a copy with	:	
·	Defendants		. :	<u> </u>) 	
SUMMONS and	COMPLAINT			:		
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- i com	Plaintiff's Attorney	Child development		······································	••••	Sheriff
			1			

Deputy Sheriff

Defendant's Attorney

DEMAND FOR ORAL EXAMINATION

Complainant

VS.

Respondent

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this 1 th day of any

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anciet Duck Register

Moore Printing Co,

Dorothy B. Wade	,
	Complainant
vs.	
Junius L. Wade	
	Respondent

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY

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DEMAND FOR ORAL EXAMINATION

labama, the place		d cause, to-wit:	
	1-10-1-2	Mrs. S. L. Moseley	
ppointed by the I	Register of this	Court.	Solicitor for Complainant
OTE:		8	
Complainan	it suggests the	name of Frances G. Crawford	
s a suitable and c	competent perso	on to act as commissioner upon the exami	nation of said witnesses.

*************	The second secon	Dorothy B. Wad	• 1 _{141 1} 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
*********		The state of the s		/	CIRCUIT COURT OF
		vs. Junius L. V	Vade		Baldwin County.
***************************************					IN EQUITY.
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day of	HVm.), a copy of th		laint filed in this cause was
Defendar	t hy racio	stomed west		••••••	
addresse	a, and re	turn receipt demand	prepaid, marked ed addressed to	"For delivery the Register o	only to the person to whom f this Court; and that on the
. "	and filed in	this cause:		193	such receipt was duly
adjudged	and decree	bill to the date ner	eof, it is now, the hat the said Bill-	erefore, on mo	nt has failed to plead, answer tion of Complainant, ordered, be, and it hereby is in all
**********		Junius L. Wade			Defendant
T	his the	day of	August		
	: ·		Illia	e f. De	
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Recorded

No.

CIRGUIT COURT OF BALDWIN COUNTY, ALA.

In Equity.

Larothy D. Wade_

Jamus P. Wade

Decree Pro Confesso After Notice By Registered Mail.

Entered in	Priet F	OUCK, Regist	ge
	FIFE-	5 1950	192Register
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MOONE PTG 60.

THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

,	DOROTHY B. WADE	Complainant			
	JUNIUS L. WADE	Respondent			
I France	s G. Crawford		-		
as Register and	Commissioner	othy B. Wade and Mrs. S. T. Moseley	- - -/:		
ruth, the whole I am 32 years 1948 in South Alabama, for Jamuary of 19 not supported the essential to Fairhope t since. Junius	Alabama, and havir truth, and nothing but the truth, the doth depose and so of age. I married Junius L. hampton, Virginia. At that the along time. My husband and 49 at which time, he deserted me at any time previously. s. He informed me that he has he first part of March, 1949	ng first sworn said Witness to speak the ne said Dorothy B. Wade ay as follows: Wade, now aged 27 years, on April 3rd ime, I had been living in Fairhope, I lived together in Virginia until d me. It was prior to the 10th. He had In fact, I was the one who supplied d no intention of coming back. I return, and have lived with kin in Fairhope we me. We had no children nor propert earnings. If I am granted a divorce,	ned		
		Qualitative de la Company de l	O dayyout		

And the said Mrs. S. T. Moseley doth depose and say as follows:

Dorothy has been back here, in Wairhope, since a year ago March last, during which time, she has lived with us. I know that her husband has made no attempt to communicate with her nor has he sent her anything toward her support since she came back to live with us.

I, FRANOES G. CRAWFORD,	as Register and Commissioner hereby certify
that the foregoing deposition Son Oral Examinati	on was taken down by me in writing in the words
of the witness and read over to Type	and 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 or had proom made before me of	f the identity of said witness; that I am not of
counsel or of kin to any of the parties to said c	ause, or any manner interested in the result thereof
I enclose the said Oral Examination in an ending Given under my hand and seal, this	
	(L. S.)
e man	

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THE STATE OF ALABAMA. Baldwin County.

CIRCUIT COURT

Mrs. S. L. Moseley as witnesses in behalf of	TO: FRANCES G. CRAWFORD	
Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine		
Commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examine		
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Mrs. S. L. Moseley as witnesses in behalf of		
Mrs. S. L. Moseley as witnesses in behalf of	to call before you and examine Dorothy B. Wade	
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Dorothy B. Wade		,
Dorothy B. Wade		
Dorothy B. Wade		
Dorothy B. Wade	as witnesses in behalf of Complainant	in a cause pending in our
	Circuit Court in Baldwin County, of said State, wherein	
Respondent to be by you administered, upon them to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand. Witness 5th day of August 195 50 August Register.	Dorothy B. Wade	
Respondent to be by you administered, upon them to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand. Witness 5th day of August 195 50 August Register.		÷
Respondent no oath, to be by you administered, upon them to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand. Witness 5th day of August 195 50 Register.		
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on oath, to be by you administered, upon	and Junius L. Wade	
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to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand. Witness 5th day of August , 195 50 Register.	on eath, to be by you administered upon them	-
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	Complain	ant—
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WITNESS		
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Mrs. S. L. Mo	:	

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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 by Registered Mail, according to law, and that said Defendant..... has... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

Junius L. Wade

This 5th day of August 19 50.

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THE STATE OF Al Baldwin Cour	化磺基二甲基二甲基二甲基	
IN EQUIT Circuit Court of Baldv		
DOROTHY B. WADE		
ys. JUNIUS L. WADE		
NOTE OF TESTIN		· · · · · · · · · · · · · · · · · · ·
Filed in Open Court this 11 day of December Aliah	l _t th , 19 2 0 	
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Addressed to	POSTMARK