

(2496)

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MABLE LAVENDER PATRICK

, Complainant

vs.

LESLIE E. PATRICK

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Con~~
~~XXXX~~ on ~~Answer and Waiver~~ 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 here-
tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and
that the said Mable Lavender Patrick is forever divorced from the
said Leslie E. Patrick for and on account of abandonment

It is further ordered, adjudged and decreed by the Court
that the Complainant be, and hereby is, allowed to resume the
use of her maiden name of Mable Lavender.

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 the Complainant and Respondent be, and they are hereby per-
mitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Mable Lavender Patrick
the Complainant pay the cost herein to be taxed, for which execution may issue.

This 7th day of July, 1950.

Jefferson P. Maddox
Judge Circuit Court, In Equity.

I, _____, Register of the Circuit
Court of 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.

RECORDED

No. _____ Page _____

The State of Alabama

BALDWIN COUNTY

In Circuit Court, In Equity

Complainant.

vs.

Respondent.

DIVORCE DECREE

RECEIPT

No. 1608

The State of Alabama, Baldwin County

Equity Division, Circuit Court.

Case No. 2496

Date 6-28, 1957

RECEIVED OF

the sum of

Sharon Street Patrick vs. Patrick
\$100

Trial Tax

\$

\$

\$

\$

\$

\$

\$

TOTAL

\$

As Register, Baldwin County, Ala.

By

MABLE LAVENDER PATRICK
COMPLAINANT

VS

LESLIE E. PATRICK
RESPONDENT

§
§
§
§

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

IN EQUITY

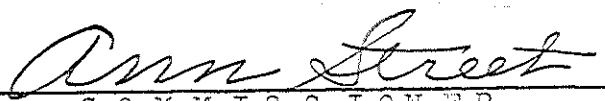
NO. _____

C E R T I F I C A T E

I, ANN STREET, the Commissioner agreed upon by the parties hereto, hereby certify that, in pursuance of the powers conferred upon me by said agreement, I caused to appear before me the witnesses requested by the Complainant, that is to say, MABLE LAVENDER PATRICK, the Complainant, and RICHARD C. KEEBLER; that said witnesses appeared before me at the offices of Shelton Street, 74 Main Street, Prichard, Alabama on the 26th day of June, 1950; that said witnesses and each of them was by me duly sworn according to law, after which they were orally examined by Shelton Street, Solicitor for Complainant, and did testify in answer to said oral interrogatories as hereinafter set out in narrative form; that I had their said testimony reduced to writing (typewriting) as near as might be in the identical language of said witnesses, that said witnesses did then subscribe their names thereto in my presence, after their said testimony had been by me read over to them.

I FURTHER CERTIFY That I am not of kin or of counsel to either of the parties to this cause, and have no interest whatsoever in the result thereof.

IN WITNESS Whereof, I have hereunto set my hand this the 26th day of June, 1950.


COMMISSIONER

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA
IN EQUITY
NO.

COUNTY, ALABAMA

IN EQUITY

NO. _____

DEPOSITION OF RICHARD C. KEEBLER

My name is RICHARD C. KEEBLER. I am a resident citizen of Mobile County, Alabama and have known the parties to this suit for several years. The Complainant was at the time of the starting of this suit a bona fide resident citizen of the State of Alabama, more than 21 years of age. The Respondent is a resident of the State of Alabama and was more than 21 years of age at the time this suit was started.

The Respondent and the Complainant were lawfully married to each other on the 4th day of May, 1946 and lived together for several years thereafter. No child was born to them and none is expected.

More than one year next before the filing of the Bill of Complaint the Respondent voluntarily abandoned the bed and board of the Complainant in Baldwin County, Alabama and has never resumed marital relations with her since. His abandonment of her has been and still is open, notorious uninter~~u~~rupted, and without any expression of intention at any time or in any manner ever returning to ~~her~~ or resuming marital cohabitation with her.

So after waiting for more than a year for him to return or show some indication of intention to do so, she has started this suit for divorce.

Richard C. Keebler
RICHARD C. KEEBLER

MABLE LAVENDER PATRICK
COMPLAINANT

VS

LESLIE E. PATRICK
RESPONDENT

Ø IN THE CIRCUIT COURT OF BALDWIN
Ø
Ø COUNTY, ALABAMA
Ø
Ø IN EQUITY
Ø NO. _____

DEPOSITION OF MABLE LAVENDER PATRICK

My name is MABLE LAVENDER PATRICK. I am the Complainant in the above styled cause and I am the wife of the Respondent, LESLIE E. PATRICK. I am and was at the time this suit was started a bona fide resident citizen of the State of Alabama, more than 21 years of age. The Respondent is a resident citizen of the State of Alabama and was more than 21 years of age at the time this suit was started.

The Respondent and I were lawfully married to each other in Lucedale, Mississippi on the 4th day of May, 1946, and lived together as husband and wife for some time thereafter. No child was born to us and none is expected.

~~More than one year next before the filing of the Bill of Complaint~~ the Respondent voluntarily abandoned my bed and board in Baldwin County, Alabama and has never returned to me or cohabited with me as his wife or otherwise since. His abandonment of me has been open, notorious, uninterrupted and without indication at any time of intention on his part to return to me or resume marital cohabitation with me.

So after waiting for more than a year for him to return or show some indication of intention to do so, I have started this suit for divorce.

Mable Lavender Patrick
MABLE LAVENDER PATRICK

MABLE LAVENDER PATRICK
COMPLAINANT

No. VS. }

LESLIE E. PATRICK
RESPONDENT

IN THE CIRCUIT COURT OF BALDWIN

COUNTY, ALABAMA

IN EQUITY

NO. _____

ORDER OF SUBMISSION

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

Dated, June 26, 1950

NOTE OF EVIDENCE

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

FOR COMPLAINANT

FILED, 6-28-50

W. C. Keckler Register }

Bill of Complaint Answer and
Waiver Depositions of Mable
Lavender Patrick and Richard
C. Keebler

Sheldon Street
Solicitor—for Complainant.

FOR RESPONDENT

Solicitor—for Respondent.

No. _____

Vs.

ORDER OF SUBMISSION
NOTE OF EVIDENCE

19.

Ent. Min. No. _____, Page _____

MABLE LAVENDAR PATRICK
COMPLAINANT

VS

LESLIE E. PATRICK
RESPONDENT

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA
IN EQUITY
NO. _____

TO THE HONORABLE JUDGE OF SAID COURT, Sitting in Equity:

Comes now your Complainant, MABLE LAVENDAR PARTICK, and, humbly complaining, presents this her Bill of Complaint, against the Respondent, LESLIE E. PATRICK, and shows:

O N E

The Complainant is and has been for more than one year next immediately preceding the filing of this suit a bona fide resident citizen of the State of Alabama, Mobile County, and is more than 21 years of age. The Respondent is a resident citizen of the State of Alabama, Mobile County, and is more than 21 years of age.

T W O

The Complainant and the Respondent were lawfully married to each other at Lucedale, Mississippi on to-wit the 4th day of May, 1946 and lived together as husband and wife in Mobile and Baldwin Counties for some time thereafter. No child was born to them and none is expected.

T H R E E

More than one year next before the filing of this suit, the Respondent voluntarily abandoned the bed and board of the Complainant in Baldwin County, Alabama and has never cohabited with her as her husband or otherwise since.

P R A Y E R

THE PREMISES CONSIDERED, The Complainant prays that the Respondent be made the party defendant hereto in a manner provided by law; that upon a final hearing herein a decree be rendered forever dissolving and annulling the bonds of matrimony heretofore existing between the parties hereto; that in said decree and as a part thereof the Complainant be given the right to resume the use of her maiden name of Mable Lavender.

AND COMPLAINANT Prays for general relief.

Mable Lavendar Patrick
COMPLAINANT

Sheldon Street
SOLICITOR FOR COMPLAINANT

MABLE LAVENDAR PATRICK

Complainant

No.

Vs.

LESLIE E. PATRICK

Defendant

IN THE CIRCUIT COURT OF BALDWIN
MOBILE COUNTY, ALABAMA
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 allegation 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 agree that Ann Street of Prichard, Alabama is a suitable person to take the testimony in this cause and may do so without a Commission from the Court.

WITNESSES:

Ann Street

Leslie E. Patrick

Defendant.

Charles Street

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____.

Filed, _____

JAMES A. CRANE, REGISTER.

NOTARY PUBLIC

STATE OF _____

COUNTY OF _____

I agree that Ann Street of Prichard, Alabama is a suitable person to take the testimony in this cause and may do so without a Commission from the Court.

Mable Lavendar Patrick
COMPLAINANT

RECORDED

No. 2496

MABLE LAVENDER PATRICK
COMPLAINANT

VS.

LESLIE E. PATRICK
RESPONDENT

ANSWER AND WAIVER

Filed _____, 19____

FILED
JUN 27 1950

ALICE J. DUCK, Register

Register.