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# The State Of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

\_\_\_\_\_ WILLIAM J. RICHBURG \_\_\_\_\_ Complainant  
 VS  
 \_\_\_\_\_ MARY ALABAMA RICHBURG \_\_\_\_\_ Respondent

**ANSWER AND WAIVER**

This cause coming on to be heard was submitted upon Bill of Complaint, ~~EXHIBITS AND ANSWERS~~  
 on \_\_\_\_\_ 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 \_\_\_\_\_ WILLIAM J. RICHBURG \_\_\_\_\_  
 is forever divorced from the said

\_\_\_\_\_ MARY ALABAMA RICHBURG \_\_\_\_\_  
 for and on account of \_\_\_\_\_ 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 \_\_\_\_\_ WILLIAM J. RICHBURG & MARY ALABAMA RICHBURG \_\_\_\_\_  
 be, and ~~THEY ARE~~ hereby permitted to again contract marriage upon the payment of the cost of  
 this suit.

It is further ordered that \_\_\_\_\_ WILLIAM J. RICHBURG \_\_\_\_\_  
 the \_\_\_\_\_ COMPLAINANT \_\_\_\_\_ pay the cost herein to be taxed, for which execution may issue.

This 8<sup>th</sup> day of \_\_\_\_\_ JULY \_\_\_\_\_, 1913.

*J. W. Hare*  
 \_\_\_\_\_  
 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.

The State Of Alabama, Baldwin County

CIRCUIT COURT IN EQUITY

STATE OF ALABAMA

IN EQUITY

vs.

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No. RECORDED

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

vs. Complainant

Respondent

DIVORCE DECREE

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WILLIAM J. RICHBURG,  
Complainant,  
vs  
MARY ALABAMA RICHBURG,  
Respondent.

E Q U I T Y  
CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA,

DEPOSITIONS OF WILLIAM J. RICHBURG AND MARVIN E. CHAMPION,  
WITNESSES FOR COMPLAINANT.

Said witnesses, being first duly sworn, upon examination by the Solicitor for the Complainant, testified as is hereinafter set forth.

WILLIAM J. RICHBURG.

I am the Complainant in this cause. Both my wife and I have been residents of Baldwin County since 1928. We were married in Covington County Alabama on January 5th, 1908. We lived together near Loxley from 1928 until May of 1938 when my wife refused to live with me any more and we parted and have lived apart ever since, she in Loxley and I in various places, sometimes in Florida but since 1941 in Barnwell and later in Fairhope. In all this time we have had no marital relations. We have had no hard words and speak as we pass but have no conversation together. She goes her way and I mine. We have four grown children, all married but one.

*William J. Richburg*

MARVIN E. CHAMPION.

I am a resident of Baldwin County and first came here first in 1930 and now live in Fairhope. I have known Mr and Mrs Richburg since 1931. For a long time I lived fairly close to them. In 1938 they parted when she left him and they have lived apart ever since. Since July of 1938 they have lived in separate homes and have had nothing to do with each other. My acquaintance with them is such that had they gone back together I would have known it. I have been fairly intimate with both of them. I can unhesitatingly say that they have lived separate and apart for the last five years and have had nothing to do with each other. Both of them are residents of Baldwin County and of legal age.

*M. E. Champion*

I, G.E. Perkins, acting as Commissioner by agreement of parties in the above styled case, hereby certify that William J. Richburg and Marvin E. Champion, witnesses for Complainant, appeared before me this day and after being sworn, on examination by Solicitor for Complainant, testified as is above set forth, and said testimony, after be-transcribed, was read over and signed by said witnesses in my presence.

I further certify that I am not of counsel or of kin to either party or in anywise interested in the result of this cause.

IN WITNESS WHEREOF, I hereto set my hand and seal as Commissioner this the fifth day of July, 1943.

*G. E. Perkins*  
Commissioner.

WILLIAM J. RICHBURG,  
Complainant,

versus

MARY ALABAMA RICHBURG,  
Respondent.

E Q U I T Y

CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA.

Comes MARY ALABAMA RICHBURG, and as Respondent in the above styled cause, for answer to the Bill of Complaint says;

FIRST: She admits the allegations of the Bill as to names, ages, residence and marriage of the parties.

SECOND: She denies all further allegations of the bill.

THIRD: Respondent hereby waives service of notice of the filing of the Bill, and of demand for oral examination of Complainant's witnesses, of the issue of commission to take testimony; of the time and place set for taking same, of the right of cross-examination and to introduce evidence in her own behalf. She further agrees that this cause may be submitted for final decree at any time on the pleading and Complainant's evidence as noted by the Register.

*Mary Alabama Richburg*  
Respondent.

BEFORE ME, the undersigned authority, personally appeared this day Mary Alabama Richburg who acknowledged that she executed the foregoing answer voluntarily with knowledge of its contents.

Witness my hand this the 3 day of July, 1943.

*H. A. Sullivan*  
Justice of the Peace, Baldwin County  
Alabama.

TO THE HONORABLE F. W. HARE,

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALA.

IN EQUITY.

Comes WILLIAM J. RICHBURG and by this Bill of Complaint presented against MARY ALABAMA RICHBURG, Shows:

FIRST: That Complainant and Defendant are both over the age of twenty-one years and are now and have been for more than five years next prior to the filing of the bill, bona fide residents of the State of Alabama, living in Baldwin County.

SECOND: That in the month of May, 1938, the Defendant, without just cause, voluntarily abandoned the bed and board of Complainant, which abandonment has continued to the present time with no resumption of marital relations whatsoever.

THE PREMISES CONSIDERED, Complainant prays that Mary Alabama Richburg be made party Defendant to this cause and by proper process required to answer this Bill within the time prescribed by law.

COMPLAINANT FURTHER PRAYS, that upon the hearing of this cause a decree be rendered forever divorcing him from said Mary Alabama Richburg, granting him the right to marry again should he so desire and such other, further or different relief as to Equity may seem meet.

*Elliot S. Rinsley*  
Solicitor for Complainant.

966e

**RECORDED**

**WILLIAM J. RICHBURG,**  
Complainant.

VS

**MARY ALABAMA RICHBURG,**  
Respondent.

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**A N S W E R .**

\* \* \*

*Filed July 15, 1943*  
*W. J. Richburg*

RECORDED 629

WILLIAM J. RICHBURG,  
Complainant

vs

MARY ALABAMA RICHBURG,  
Respondent.

Depositions of complainant's  
witnesses.

July 17 1943  
*[Signature]*

Commissioner's fee PAID.

*[Faint, mostly illegible text, likely a deposition transcript or legal notice]*

*[Handwritten signature]*

*[Faint, mostly illegible text, likely a deposition transcript or legal notice]*

WILLIAM J. RICHBURG

VS.

MARY ALABAMA RICHBURG

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, \_\_\_\_\_

and answer and waiver and testimony of WILLIAM J. RICHBURG, MARVIN

E. CHAMPION.

and in behalf of Defendant upon \_\_\_\_\_

*R. Duck*

Register.



RECORDED

No. 966

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

WILLIAM J. RICHBURG

VS.

MARY ALABAMA RICHBURG

NOTE OF TESTIMONY

Filed in Open Court this 7th

day of ~~xxth~~ July 194 3

*W. J. Richburg*

Register.