

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

Circuit Court, In Equity

MARVIN E. FLOWERS

vs.

Complainant

WANDA M. FLOWERS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on waiver and answer 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 MARVIN E. FLOWERS is forever divorced from the said WANDA M. FLOWERS for and on account of abandonment.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED BY THE COURT That the Respondent shall be granted the care, custody and control of the children of this marriage.

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 permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that MARVIN E. FLOWERS the Complainant pay the cost herein to be taxed, for which execution may issue.

This 15th day of February, 1951.

Felicia M. Massey
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. 2604 Page

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED
Feb 15 1951

ALICE J. DICK, Register

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

MARVIN E. FLOWERS

Complainant

VS.

WANDA M. FLOWERS

Respondent

I, Peggy Guy

as Register and Commissioner in the above styled cause
have called and caused to come before me Marvin E. Flowers and Mrs. Ada Miller

witnesses named in the Requirement for Oral Examination, on the 20th day of January
1945, at the office of C. LeNoir Thompson
in Bay Minette, Alabama, and having first sworn said Witnesses to speak the
truth, the whole truth, and nothing but the truth, the said Marvin E. Flowers and Mrs.
Ada Miller doth depose and say as follows:

That my name is Marvin E. Flowers, that I am over the age of twenty-one and a resident of Baldwin County, Alabama and have been more than two years next preceding, that the Respondent is over the age of twenty-one and at the time of our separation was a resident of Baldwin County, Alabama, that your Complainant and the Respondent were married on October 22, 1944 at Cutchogue, Long Island, New York, and lived together as husband and wife until January 15, 1949, that my wife left me without any fault on my part and returned to New York having refused to come back and live with me in Alabama and we have not lived together as husband and wife since the date of separation. There is no property to be divided between the parties.

Marvin E. Flowers

That my name is Mrs. Ada Miller, I am over the age of twenty-one and a resident of Alabama. I know both parties to this suit and I know that they were married and lived as husband and wife, until the Respondent left Alabama and went back to New York to live. I know of no cause the Complainant gave the Respondent for abandoning him. They have not lived together as husband and wife, since she left.

Mrs. Ada Miller

ORAL EXAMINATION.

I, Peggy Guy, as Register and Commissioner hereby certify that the foregoing deposition s on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and C. LeVeir Thompson at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witnesses 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 20th day of January, 1950

Peggy Guy (L. S.)

NO. 2604 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed _____, 194____

_____, Register.

Recorded in

_____, Record

Vol. _____

_____, Register.

FILED
FEB 12 1957
ALICE T. DUCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA.
Baldwin County.

CIRCUIT COURT

TO: Peggy Guy

KNOW YE: that we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Marvin E. Flowers
and Ada Miller

as witnesses in behalf of Comp L in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Marvin E. Flowers

_____, Complainant
and Wanda M. Flowers

_____, Respondent
on oath, to be by you administered, upon them
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness 20th day of Jan, 1958

Berice L. Smith
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

STATE OF ALABAMA
BALDWIN COUNTY

You are hereby commanded to summon WANDA M. FLOWERS, to appear and plead, answer or demur, within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by MARVIN E. FLOWERS, as Complainant, and against WANDA M. FLOWERS, as Respondent.

WITNESS my hand this 12th day of Feb, 1951.

Alexander
Register

MARVIN E. FLOWERS
COMPLAINANT
VS
WANDA M. FLOWERS
RESPONDENT

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

TO HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Your Complainant, Marvin E. Flowers, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County and have been more than two years next preceding; and your Respondent is over the age of twenty-one and the Complainant is over the age of twenty-one.

2.

That your Complainant and the Respondent married at Cutchogue, Long Island, New York, on October 22, 1944, and lived together as husband and wife in Baldwin County, Alabama until on to-wit, January 15, 1949.

3.

Complainant avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this bill of complaint, since which time Complainant and Respondent have not lived together nor in anyway recognized each other as husband and wife.

4.

That the children of this marriage are with their mother, the respondent in said cause and she has returned with them to New York State. Your petitioner believes that the said respondent is a good and responsible person to have the care, custody, and control of said children.

WHEREFORE the premises considered, the Complainant prays that your Honor will by proper process make the said Wanda M. Flowers, party Respondent to this cause of action, requiring her 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.

Complainant further prays that upon a final hearing hereof your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; That your honor will grant the care, custody and control of the children, as fruits of this marriage, to the respondent in said cause. Complainant further prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.


Solicitor for Complainant

RECORDED

MARVIN E. FLOWERS

COMPLAINANT

VS

WANDA H. FLOWERS

RESPONDENT

BILL OF COMPLAINT

From the law offices of
C. Lenoir Thompson
Bay Minette, Alabama

Filed 2-12-57
Cliff J. Lenoir
Reg.

MARVIN E. FLOWERS

VS.

WANDA M. FLOWERS

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
testimony of Marvin E. Flowers and Mrs. Ada Miller, and waiver and
answer.

and in behalf of Defendant upon _____

Chas. J. Thompson
Attorney

Alice J. Rusk
Register.

RECORDED

No. 2604

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this

day of

194

FILED
FEB 12 1951
ALICE J. DUCK, Register.

Register.

Printed By The Baldwin Times

SOLOMON RAFFE
COUNSELOR AT LAW
84 WEST MAIN STREET
RIVERHEAD, NEW YORK
TEL. RIVERHEAD 3662-3

May 19, 1950

C. LeNoir Thompson, Esq.
Bay Minette, Alabama

Re: Flowers v. Flowers

Dear Sir:

I am enclosing herewith notice of appearance which has been properly executed and notarized.

It is understood and agreed that this notice of appearance is to be used on condition that the Court does not award custody of the children to the husband but awards custody of the children to the wife, Wanda M. Flowers, if it is at all possible in your jurisdiction.

This matter is being handled by the undersigned as chairman of the North Shore Division of Legal Aid of the Suffolk County Bar Association.

Very truly yours,

Solomon Raffe
SOLOMON RAFFE

SR:VDW

Enc.

MARVIN E. FLOWERS

Complainant

VS

WANDA M. FLOWERS

Respondent

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

Now comes the Respondent and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages and marriage and residence, but denies all other allegations contained in the bill of complaint, and demand strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses; and agrees that this cause be submitted for final decree without notice.

Wanda M. Flowers

STATE OF NEW YORK
COUNTY OF SUFFOLK

I, VIRGINIA D. WEBER, A Notary Public,
in and for said County, in said State, hereby certify that Wanda M. Flowers,
whose name is signed to the foregoing conveyance, and who is known to
me, acknowledged before me on this day that, being informed of the
contents of the conveyance, be executed the same voluntarily on the
day the same bears date.

Given under by hand and seal on this the 17th day of May,
1950.

Virginia D. Weber
Notary Public
VIRGINIA D. WEBER
NOTARY PUBLIC IN THE STATE OF NEW YORK
Residing in Suffolk County
Suffolk County No. 2202
Commission Expires March 20, 1951

See letter attached and forming
part of this notice of appearance
dated May 19, 1950.

no 2604

RECORDED

FILED

FEB 12 1951

ALICE J. DICK, Registrar



STATE OF NEW YORK }
County of Suffolk } ss:

Form No. 115

I, R. FORD HUGHES, Clerk of the County of Suffolk, and also Clerk of the Supreme Court for said County, the same being a Court of Record, DO HEREBY CERTIFY that

Virginia D. Weber

whose name is subscribed to the deposition or certificate of the proof or acknowledgment of the annexed instrument and thereon written was at the time of taking such deposition or proof or acknowledgment a NOTARY PUBLIC in and for such County, duly commissioned and sworn, and authorized by the laws of said State to take depositions and to administer oaths to be used in any Court of said State and for general purposes; and also to take acknowledgments and proofs of deeds of conveyances for land, tenements or hereditaments in said State of New York. And further that I am well acquainted with the handwriting of such NOTARY PUBLIC and verily believe that the signature of said deposition or certificate of proof or acknowledgment is genuine.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Seal of the said Court and County the 18 day of May, 1950

R. Ford Hughes

Clerk.

