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MARY ELAINE BOLLINGER KRAMER,

Complainant

-vs-

RALPH C. KRAMER,

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C	LRC	נט:	T	COURT	Œ	BALDWIN
С	OUI	VΥΥ	, ,	STATE	Œ	ALABAMA

Respondent

TO THE

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

Comes MARY ELAINE BOLLINGER KRAMER and by this her Bill of Complaint presented against RALPH C. KRAMER, respectfully shows:

FIRST: That both Complainant and Defendant are over the age of twenty-one (21) years; and are now, and have been for more than five (5) years next preceeding the filing of this Bill of Complaint, residents of Baldwin County in the State of Alabama; and are now residents of Fairhope; and their post office address is Fairhope, Alabama.

SECOND: That Complainant and Respondent were married on or about the thirteenth day of December, Nineteen Hundred Forty-one, and lived together as husband and wife until on or about the twentyfifth day of January, Nineteen Hundred Fifty.

THIRD: That this this marriage there has been born two girls, namely, Arla Elaine and Christine Louise, aged seven (7) and six (6) respectively, who are now living with this Complainant, their Mother; and it is to the best interest of these minor children that they remain under the care and custody of this Complainant, their Mother.

FOURTH: That prior to January, Nineteen Hundred Fifty, Complainant and Respondent lived together as man and wife, having more and more friction, but that in January, Nineteen Hundred Fifty, Defendant threatened actual, physical violence to the person of his wife, this Complainant, attended with danger to her life or health; and the Complainant has reasonable grounds to apprehend such further violence if she and Defendant continue to live together.

That in January, 1950, Complainant and Respondent ceased to live together as man and wife, but conditions grew worse and we finally separated in August, 1950; but since January, 1950, and up until August, 1950, there were repeated threats of violence.

- 2 -

FIFTH: Complainant further alleges that the parties to this action have agreed to what they think is a reasonable and proper agreement as to the custody and support of the minor children, as shown by their agreement hereto annexed and marked "Exhibit 'A'"

THE PREMISES CONSIDERED, Complainant prays that RALPH C. KRA-MER be made a party Defendant to this cause, and by proper process, and required to answer this Bill within the time prescribed by law.

Complainant further prays that upon a hearing of this Bill, the Court will take into consideration the agreement of the parties allowing the Complainant to have full custody of the two minor children, namely, Arla Elaine and Christine Louise; and further allowing the Complainant a reasonable sum for the support and maintainence of said minor children, taking into consideration the agreement made between the parties and attached to this Bill of Complaint; and the Court will upon the hearing of this cause render a decree forever divorcing this Complainant from the said RALPH C. KRAMER, and give this Complainant full custody of said minor children with reasonable proper support for them; and that either party may petition this Court to have this decree as to support modified at any time should a change of condition warrant it; and such other, further or different relief as to equity may seem met.

Mary Claime 13 RICKARBY & RICKARBY \$ Q E. G. Rickarby, Jr. SOLICITORS FOR COMPLAINANT

BECORDED No. 2606 1 an ol e e 1000 22 EQUITY $\leq \varphi$ CIRCUIT COURT OF BALDWIN COUNTY, STATE OF ALABAMA $\langle \rangle$ a g s - : ---< 3. MARY ELAINE BOLLINGER KRAMER, 0 Oomplainant ыř С (ð 47 ⇒VS-영상 전 12 12 12 RALPH C. KRAMER, 202 \odot Defendant 0 $\langle \rangle$ 신 ynge der angele erste Seine administrationen af erste 20 1.1.4 0 A 12 BILL OF CO MPLAINT 0 9 9 5.4* 12) 5-5 17 FЕB 1951 ALICE J. BUCK, Register 20.02 A state of the sta . . 65 RICKARBY & RICKARBY C oxilo Solicitors for Complainant Bar (

MARY ELAINE BOLLINGER KRAMER,

Complainant

-vs-

RALPH C. KRAMER,

Respondent

ANSWER and WAIVER

Comes RALPH C. KRAMER, Respondent in the above styled cause, and for answer to the Bill of Complaint says he denies each allegation of same.

Respondent hereby waives notice 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 and of the right to introduce evidence in his own behalf. He 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 of this Court.

Respondent.

in i

No.

CIRCUIT COURT OF BALDWIN

COUNTY, STATE OF ALABAMA

EQUITY

STATE OF ALABAMA COUNTY OF BALDWIN

Before me, the undersigned Notary Public in and for said County in said State, personally appeared RALPH C. KRAMER, who is known to me to be the Respondent above named and who acknowledged that he executed the foregoing answer voluntarily with knowledge of its contents.

Witness my hand and official seal this the day , Nineteen Hundred Fifty-One.

Notary Public, Baldwin County, Alabama

RECORD No. 2606 EQUITY CIRCUIT COURT OF BALDWIN COUNTY, STATE OF ALABAMA an proved an and MARY ELAINE BOLLINGER KRAMER, $\langle . \rangle$ Complainant ~VS⇔ RALPH C. KRAMER, Respondent and the second second $\begin{array}{c} \label{eq:constraint} \left\{ \begin{array}{c} W_{0} = W_{0} & W_{0} & W_{0} & W_{0} & W_{0} \\ W_{0} = W_{0} & W_{0} & W_{0} & W_{0} \\ W_{0} = W_{0} & W_{0} & W_{0} & W_{0} \\ W_{0} = W_{0} & W_{0} & W_{0} & W_{0} \\ W_{0} = W_{0} \\ W_{0} \\ W_{0} = W_{0} \\ W_{0} = W_{0} \\$ ANSWER and WAIVER €5 -≁ € 1 2 A. 1951 $\langle \rangle$ en de construction de la construcción de la WEX, REENT RICKARBY & FICKARBY Solicitors for Complainant

STATE OF ALABAMA COUNTY OF BALDWIN

WHEREAS, MARY ELAINE BOLLINGER KRAMER and RALPH C. KRAMER are living separate and apart, and

WHEREAS, MARY ELAINE BOLLINGER KRAMER is filing a suit for divorce, and

WHEREAS, MARY ELAINE BOLLINGER KRAMER and RALPH C. KRAMER have agreed that they think the sum of Eight and 35/100 Dollars (\$8.35) per week is a proper amount for RALPH C. KRAMER to contribute for the support of their minor children, Arla Elaine and Christine Louise, aged seven (7) and six (6), respectively, and

WHEREAS, RALPH C. KRAMER is now earning the sum of Thirty-two and 50/100 Dollars (\$32.50) per week for his work in the Pro Shop of the Grand Hotel, Point Clear, Alabama, and should his earnings increase he will also pay a sum equal one-half (2) the increased earnings, less the additional expense of holding his job, if any, for the support of his children. And

WHEREAS, MARY ELAINE BOLLINGER KRAMER AND RALPH C. KRAMER think that MARY ELAINE BOLLINGER KRAMER is the proper person to have the custody of said children, and it is to the best interest of said children to be with their Mother, MARY ELAINE BOLLINGER KRA-MER, they respectfully ask the Judge of the Circuit Court of Baldwin County, Alabama, to take these facts into consideration when fixing the custody and support of said minor children in rendering divorce decree.

Done this the 5 day of Few, , 1951.

Many Claim Bollingen Kramen Ralph C. Kramen

STATE OF ALABAMA

COUNTY OF BALDWIN

I, the undersigned Notary Public in and for said county in said State, hereby certify that MARY ELAINE BOLLINGER KRAMER, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before me on this day, that, being informed of the contents of this agreement, she executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this the day of , 1951.

Notary Public, Baldwin County, Alabama

STATE OF ALABAMA

COUNTY OF BALDWIN

I, the undersigned Notary Public in and for said county in said State, hereby certify that RALPH C. KRAMER, whose name is signed to the foregoing agreement, and who is known to me, acknowledged before me on this day, that, being informed of the contents of this agreement, he executed the same voluntarily on the day the same bears date.

day of Automatic day of

Notary Public, Baldwin County, Alabama

MARY	ELA	INE	BOLLINGER	KRAMER,	X	IN THE	C	IRCUIT	COURT	OF
			Complat	inant,	X	BALDWI	N	COUNTY,	ALAB	AMA
		Vs.	,		X		IN	EQUITY	7	
RALPI	H C.	KR/	MER,		X	CASE N	ю.	2606		
			Respond	lent.	ĭ					

VERIFIED PETITION PRAYING FOR CONTEMPT CITATION

TO THE HONORABLE HUBERT M. HALL, JUDGE OF CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

1. This day came your Petitioner, now Mary Elaine Bollinger Kramer Hanson, and respectfully showssto the Court that on, towit, the 8th day of March, 1951, this Honorable Court rendered a decree divorcing your Petitioner from Ralph C. Kramer.

2. That in said decree the Court ordered the said Ralph C. Kramer to pay to your Petitioner for the support of the children of her marriage with the said Ralph C. Kramer, the sum of \$8.35 per week, to continue weekly thereafter until further orders of the court. That itewas further ordered and decreed by the court that the said Ralph C. Kramer was to pay your Petitioner for the support of the children of their marriage a sum equal to one-half of his increased earnings, less the additional expense of holding his job, if any.

3. That on the 17th day of May, 1955, your Petitioner filed a verified petition praying for contempt citation against the said Ralph C. Kramer for having failed to comply with the decree of the court as above set out. The said Ralph C. Kramer being financially able to comple with the said decree. On May 17, 1955, your Honor issued a rule to show cause why the said Ralph C. Kramer had not complied with the previous decree of the court, and the same was set for a hearing the 2nd day of June, 1955 at 2:00 p.m. On the 30th day of June, 1955, Your Honor entered anorder directing the said Ralph C. Kramer to pay to your Petitioner the sum of \$10.00 a week to be applied by her toward the maintnenance and support of the said minor children, Arla Elaine Kramer and Christine Louise Kramer. Further that the said Ralph C. Kramer, though having the financial ability to comply with this latter decree, has willfully refused to pay to your Petitioner the sum directed to be paid by said court and his payments have not been in accordance with the said decree. That the said Ralph C. Kramer is in arears for the support of the children of the marriage in the sum of \$300.00.

Premises considered, your Petitioner, Mary Elaine Bollinger Kramer Hanson, respectfully prays that this court make an order and decree requiring the said Ralph C. Kramer to be and appear before the court at such time and place as your Honor may direct to show cause, if any he has, why he should not be punushed as for a contempt. Petitioner will ever pray, etc.

Mary Elaine Bollinger Kramer Hanson

STATE OF ALABAMA BALDWIN COUNTY

Before me, a Notary Public in and for said County and State, personally appeared Mary Elaine Bollinger Kramer Hanson, who being known to me, and being by me first duly sworn, does depose and say she has knowledge of the facts stated in the above petition and that said facts as therein stated are true.

Mary Clas

Sworn to and subscribed before me on this the 20 day of October, 1961.

Notary Public

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ELAINE BOLLINGER KRAMER,	X	IN THE CIRCUIT COURT OF
Complainant,	X	BALDWIN COUNTY, ALABAMA
Vs.	X	IN EQUITY
RALPH C. KRAMER,	X	
Respondent.	ĭ	

RULE TO SHOW CAUSE

Elaine Bollinger Kramer Hanson having filed her verified Petition praying that Ralph C. Kramer be required to appear and show cause, if any he have, why he should not be punished as for a contempt in regard to the nature of the things set out in the verified petition; and upon consideration of said Petition, it is

ORDERED, ADJUDGED and DECREED, by the Court, that the said Ralph C. Kramer appear before the court at $\frac{10}{10}$ o'clock on the 18 day of Monthan, 1961, in the court room of the Circuit Court in Baldwin County, at Bay Minette, Alabama, and show cause, if any he has, why he should not be punished as for contempt. Let a copy of said Petition and of this Rule to Show Cause be served forthwith, personally, upon Ralph C. Kramer, by the sheriff of any County where he may be found within this State.

Done this 13 day of Normander, 1961.

Circuit Court of Baldwin County, Ala.

10,2606 all'a ý. Not found in my county after diligent search and in-Mary Claime Bollinger Krahner The set of $\sum_{i=1}^{n} \left(\sum_{j=1}^{n} \sum_{i=1}^{n} \sum_{i=1}^{n} \sum_{i=1}^{n} \sum_{j=1}^{n} \sum_{i=1}^{n} \sum_{i=1}^{n} \sum_{i=1}^{n} \sum_{i=1}^{n} \sum$ and the second sec ¹⁰ S. M. S. W. S. S. S. M. M. M. S. M and the set of the second pro-and the second of the second o Jaylor Ralph C. Mamer A state of the sta Ens, Sheriff المراجع 12-61 weiner in and der Arten auf der Arten and d Arten and der Arten and d and the second s and the second of the second secon 5 4 The second se and the boot of the first of the second of the second second second second second second second second second s A second s The second secon By service or Received served (2) and the same of the function of any second s (2) all which we assume that the second sec second sec الا المالية المالية المعالمات التي المالية المالية المالية. منه المالية معالمة المالية المالية من المالية المالية المالية المالية المالية المالية المالية المالية المالية ا and the second second ្ម artistica a special and a second s ល copy 1 Ri <u>_</u> $\widetilde{\mathbf{m}}$ TAYLOR WILKINS, the within 1 1 dev of A second s and a subscription of the second and the second se 0 Sheriff to be derived on to 5 Þ Republe. Kranner S

MARY ELAINE	BOLLINGER KRAMER,	X	IN THE CIRCUIT COURT OF
	Complainant,	X	BALDWIN COUNTY, ALABAMA
Vs		Ĩ	IN EQUITY
RALPH C. KR	AMER,	Ĭ	CASE NO. 2606
	Respondent.	Y	

VERIFIED PETITION PRAYING FOR CONTEMPT CITATION TO THE HONORABLE HUBERT M. HALL, JUDGE OF CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

1. This day came your Petitioner, now Mary Elaine Bollinger Kramer Hanson, and respectfully shows to the Court that on, towit, the 8th day of March, 1951, this Honorable Court rendered a decree divorcing your Petitioner from Ralph C. Kramer.

2. That in said decree the Court ordered the said Ralph C. Kramer to pay to your Petitioner for the support of the children of her marriage with the said Ralph C. Kramer, the sum of \$8.35 per week, to continue weekly thereafter until further orders of the court. That it was further ordered and decreed by the court that the said Ralph C. Kramer was to pay Your Petitioner for the support of the children of their marriage a sum equal to one-half of his increased earnings, less the additional expense of holding his job, if any.

3. That on the 17th day of May, 1955, your Petitioner filed a verified petition praying for contempt citation against the said Ralph C. Kramer for having failed to comply with the decree of the court as above set out. The said Ralph C. Kramer being financially able to comply with the said decree. On May 17, 1955, your Honor issued a rule to show cause why the said Ralph C. Kramer had not complied with the previous decree of the court, and the same was set for a hearing the 2nd day of June, 1955 at 2:00 p.m. On the 30th day of June, 1955, Your Honor entered an order directing the said Ralph C. Kramer to pay to your Petitioner the sum of \$10.00 a week to be applied by her toward the maintenance and support of the said minor children, Arla Elaine Kramer and Christine Louise Kramer. Further that the said Ralph C. Kramer, though having the financial ability to comply with this latter decree, has willfully refused to pay to your Petitioner the sum directed to be paid by said court and his payments have not been in accordance with the said decree. That the said Ralph C. Kramer is in arears for the support of the children of the marriage in the sum of \$340.00.

Premises considered, your Petitioner, Mary Elaine Bollinger Kramer Hanson, respectfully prays that this court make an order and decree requiring the said Ralph C. Kramer to be and appear before the court at such time and place as your Honor may direct to show cause, if any he has, why he should not be punished as for a contempt. Petitioner will ever pray, etc.

Mary Claine Bollinger Kramer Hanson

STATE OF ALABAMA BALDWIN COUNTY

Before me, a Notary Public in and for said County and State, personally appeared Mary Elaine Bollinger Kramer Hanson, who being known to me, and being by me first duly sworn, does depose and say she has knowledge of the facts stated in the above petition and that said facts as therein stated are true.

Mary Elaine B Clinger Kramer / Lanson

Sworn to and subscribed before me on this the 18 day of December, 1961.

JAN 15 1962

Barbara No/#ary Public

ALICE I. DUCK, CLERK

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RULE TO SHOW CAUSE

This day came Mary Elaine Bollinger Kramer Hanson and filed her verified petition for an order upon Ralph C. Kramer to show cause why he should not be punished as for a contempt, a true and correct copy of said verified petition being hereto attached, and now upon consideration of the same, it is

Ordered, adjudged and decreed by the Court:

1. That the said Ralph C. Kramer do appear before the court in his own proper person at 2 P.m. on .~ Court, 1961, in the Court Room of the Circuit Court of Baldwin County, Alabama, at Bay Minette, Alabama, then and there to show cause, if any he have, why he should not be punished as for a contempt of court for and on account of the matters and things set out in the verified petition of the said Mary Elaine Bollinger Kramer Hanson.

That the Sheriff of Baldwin County do forthwith serve 2. upon the said Ralph C. Kramer a copy of this order and the attached petition, and make due return thereof.

3. Done this 15 day of _____, 196**2.** Hubert M. Hall, Circuit Judge



2606 Mary Elaine Bollinger. Kramer. and the second 0 Sheriff claims 7-D-Ten Cents per mile Total SALOR TAYLOR WILKINS, Sheriff a production and a production of the second s iles as Ralph C. Kramer Pine Crest & Church At Thope DEPUTY SHERIFF put ' service 3 Ŷ المحمد المحم المحمد C3 TAYLOR 8 **WILKING** and the second [2] Statistical and the second secon second sec and the second of the second secon Sheriff الاردىيە بېرىكى كې 1944-يىيىتىل خەركى JAN 15 1952 All and the second 3 0220 C OLERIK REGISTER? Worker Drand Hotel

MARY ELAINE BOLLINGER KRAMER HANSEN,

Complainant,

VS.

RALPH C. KRAMER,

Respondent.

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY NO. 2606

This cause coming on to be heard was submitted upon the verified petition of the Complainant, Mary Elaine Bollinger Kramer Hansen, formerly Mary Elaine Bollinger Kramer, and the parties appearing before the Court in person and by and through their respective Solicitors of Record, the Court, after a consideration of the pleadings and the evidence taken ore tenus in open Court, is of the opinion that the Respondent is indebted to the Complainant in the sum of ONE HUNDRED THIRTY SIX AND 00/100 (\$136.00) DOLLARS as payments in arrears; that TEN AND 00/100 (\$10.00) DOLLARS per week is a reasonable amount to be paid by the Respondent to the Complainant towards the maintenance and support of the minor children, Afla Elaine Kramer and Christine Louise Kramer.

IT IS, THEREFORE, ORDERED, ADJUDGED AND DECREED by the Court that the Respondent pay into the hands of the Complainant the sum of TEN AND 00/100 (\$10.00) DOLLARS a week, to be applied towards the maintenance and support of said minor children, Arla Elaine Kramer and Christine Louise Kramer.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Respondent pay into the hands of the Complainant, towards the support and maintenance of said minor children, within 90 days from this date, the sum of ONE HUNDRED THIRTY SIX AND 00/100 (\$136.00) DOLLARS, the amount found by the Court for which the Respondent is in arrears.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Court

retain jurisdiction of this matter for such other, further or different orders and decrees as may be necessary and proper in the premises.

IT IS FURTHER ORDERED that the Respondent pay the cost of this proceeding, for which execution may issue.

This <u>30</u> day of June, 1955.

Hubert MItale

ELAINE E	OLLINGER KRAMER,	X	
	Complainant,	ž	IN THE CIRCUIT COURT OF
	Vs.	X	BALDWIN COUNTY, ALABAMA
RALPH C.	KRAMER,	I	IN EQUITY
	Respondent.	Y	

This cause coming on to be heard was submitted upon the Verified Petition of the Complainant, Elaine Bollinger Kramer Hanson, and the parties appearing before the Court in person, and the Court, after a consideration of the pleadings and the evidence taken ore tenus in open Court, is of the opinion that the Respondent is indebted to the Complainant in the sum of \$230.00 as payments in arrears.

It is, therefore, ORDERED, ADJUDGED and DECREED by the Court that the Respondent pay into the hands of the Complainant, toward the support and maintenance of said minor children, on or before the 1st day of March, 1962, the sum of \$230.00, the amount found by the Court for which the Respondent is in arrears.

It is further ORDERED, ADJUDGED and DECREED that the Court retain jurisdiction of this matter for such other, further, or different orders and decrees as may be necessary and proper in the premises.

It is further ORDERED that the Respondent pay the costs of this proceedings for which execution may issue.

Done this Z day of February, 1962.

when the stal

Hubert M. Hall, Circuit Judge of the 28th Judicial Circuit, Baldwin County, Alabama. ELLIOTT G. RICKARBY

LAW OFFICES

RICKARBY & RICKARBY

E. G. RICKARBY, JR.

6 March 1951

Mrs. Alice J. Duck Register of the Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

KRAMER -vs- KRAMER: After I telephoned you this morning, I looked carefully through my files and my records show that on 28 February we wrote you saying we were enclosing three copies of the decree, testimony and note of evidence. This letter must have "gone astray"

We have retyped these papers and have had the testimony re-executed and they are enclosed herewith.

We handle so much correspondence between our offices that when a slip-up comes like this, I want to be sure and find out what causes it so it will not happen again. Please let us have your opinion on what happened in this instance. We feel certain we put everything in a brown envelope and mailed it to you Friday afternoon, 2 March.

Yours veryttruly,

for RICKARBY & RICKARB

EGR, JR.:M 1123

MARY ELAINE BOLLINGER KRAMER

Complainant

NO. 2606

EQUITY

CIRCUIT COURT OF BALDWIN

COUNTY, STATE OF ALABAMA

RALPH C. KRAMER,

-vs-

Respondent

NCTE OF SUBMISSION This cause was submitted on behalf of complainant upon bill of complaint, agreement, answer and waiver and testimony of Mary Elaine Bollinger Kramer and Janice Lienau. RICKARBY & RICKARBY BY E. G. Rickarby, Jr.; Solicitors for Complainant. Murch Neurob Regnite.

RECORDED

NO. 2606 E Q U I T Y

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COUNTY,	STATE	OF	ALABAMA	. :
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RICKARBY & RICKARBY Solicitors for Complianant MARY ELAINE BOLLINGER KRAMER,

Complainant

-vs-

E Q U I T Y CIRCUIT COURT OF BALDWIN

RALPH C. KRAMER,

COUNTY, STATE OF ALABAMA

Respondent

DEPOSITION OF MARY ELAINE BOLLINGER KRAMER

The above named appeared before me at the time and place hereinafter stated and upon examination by counsel for Complainant, after being sworn, testified as follows:

MARY ELAINE BOLLINGER KRAMER

My name is Mary Elaine Bollinger Kramer and I am filing this bill for divorce against my husband, Ralph C. Kramer. We are both over the age of twenty-one (21) years and are now, and have been for more than five (5) years next preceeding the filing of this Bill of Complaint, bona fide residents of Baldwin County, Alabama. We were married on or about the thirteenth day of December, 1941, and lived together as husband and wife until January, 1950.

We have had two children, namely: Arla Elaine and Christine Louise, who are seven (7) and six (6) years old, respectively, and are now living with me, and want to continue to live with me.

Prior to January, 1950, we were having more and more friction. Once he struck me with his fis t. I tried to keep from separating; though we did not live together as man and wife after January, 1950, After that time our relations grew worse. He struck me on two different occasions. Because of his conduct I realize that things were getting worse and he was likely to continue this conduct. I had become sick and nervous from all this friction and had lost about fifteen (15) pounds weight.

We separated in the latter part of August, or the first part of September, 1950, and have not lived together since that time.

I have signed the agreement marked "Exhibit 'A" and attached to my Bill of Complaint and agree that considering my husband's present wages that is about the amount I should expect as maintainence for the children and Mr. Kramer thinks it correct.

Mary Clain, Bollingin Kramer Complainant.

NO.____

MARY ELAINE BOLLINGER KRAMER,

NO. EQUITY

CIRCUIT COURT OF BALDWIN

COUNTY, STATE OF ALABAMA

Complainant

-VS-

RALPH C. KRAMER,

Respondent

DEPOSITION OF JANICE LIENAU

The above named appeared before me at the time and place hereinafter stated and upon examination by counsel for Complainant, after being sworh, testified as follows:

JANKE LIENAU

My name is Janice Lienau and I am a resident of Fairhope, Baldwin County, Alabama. I know Mary Kramer and her husband, Ralph C. Kramer, and have been knowing them for about four (4) years. I know that they are bona fide residents of Baldwin County, Alabama, and have been living here all the time, and that they are now man and wife; and have two (2) children, about six and seven years of age, who are styaing with their mother and their mother is taking good care of them.

I know further that they were living together prior to August, 1950, but there was more or less friction and that after August, 1950, they separated. I did not ever see him commit any actual physical violence upon her.

I knew Mrs. Kramer through the work we did at the church. She has always impressed me as a very competent and good mother to the children.

Janice Lungany Witness for Complainant.

CERT IF ICATE

I, Martha W. McReavy, acting as commissioner by appointment by the Register of the Circuit Court of Baldwin County, Alabama, hereby certify that in the case of Mary Elaine Bollinger Kramer versus Ralph C. Kramer, pending on the Equity side of the Circuit Court of Baldwin County, I caused Mary Elaine Bollinger Kramer, the complainant, and Janice Lienau, her witness, to appear before after being duly sworn, upon examination by the Solicitor for the complainant, they testified as heretofore written, and their testimony, after being reduced to writing was read over and signed

I further certify that I am neither of counsel nor of kin of either party to the cause or in anywise interested in the result thereof.

IN WITNESS WHERE OF, I hereto set my hand and seal as commissioner, this the 6th day of March, 1951.

nartha 20

CERT IF ICATE

I, Martha W. McReavy, acting as commissioner by appointment by the Register of the Circuit Court of Baldwin County, Alabama, hereby certify that in the case of Mary Elaine Bollinger Kramer court of Baldwin County, I caused Mary Elaine Bollinger Kramer, the complainant, and Janice Lienau, her witness, to appear before after being duly sworn, upon examination by the Solicitor for the complainant, they testified as heretofore written, and their testimony, after being reduced to writing was read over and signed

I further certify that I am neither of counsel nor of kin of either party to the cause or in anywise interested in the result thereof.

IN WITNESS WHERE OF, I hereto set my hand and seal as commissioner, this the 6th day of March, 1951.

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MARY EL	AINE BOLLINGER KRAMER,	Max	IN THE CIRCUIT COURT OF
	Compleinant,	X	BALDWIN COUNTY, ALABAMA
	Vs.	X	IN EQUITY
RALPH C	. KRAMER,		CASE NO. 2606
	Respondent.	X	(22) A start of the second se Second second seco

VERIFIED PETITION PRAYING FOR CONTEMPT CITATION

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TO THE HONORABLE HUBERT M. HALL, JUDGE OF CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

1. This day came your Petitioner, now Mary Elaine Bollinger Kramer Hanson, and respectfully shows to the Court that on, towit, the 8th day of March, 1951, this Honorable Court rendered a decree divorcing your Petitioner from Ralph C. Kramer.

2. That in said decree the Court ordered the said Ralph C. Kramer to pay to your Petitioner for the support of the children of her marriage with the said Ralph C. Kramer, the sum of \$8.35 per week, to continue weekly thereafter until further orders of the court. That thewas further ordered and decreed by the court that the said Ralph C. Kramer was to pay your Petitioner for the support of the children of their marriage a sum equal to one-half of his increased earnings, less the additional expense of holding his job, if any.

3. That on the 17th day of May, 1955, your Petitioner filed a verified petition praying for comtempt citation against the said Ralph C. Kramer for having failed to comply with the decree of the court as above set out. The said Ralph C. Kramer being financially able to comple with the said decree. On May 17, 1955, your Honor issued a rule to show cause why the said Ralph C. Kramer had not complied with the previous decree of the court, and the same was set for a hearing the 2nd day of June, 1955 at 2:00 p.m. On the 30th day of June, 1955, Your Honor entered anorder directing the said Ralph C. Kramer to pay to your Petitioner the sum of \$10.00 a week to be applied by her toward the maintnenance and support of the said minor chiddren, Arla Elaine Kramer and Christine Louise Kramer. Further that the said Ralph C. Kramer, though having the financial ability to comply with this latter decree, has willfully refumed to pay to your Petitioner the sum directed to be paid by said court and his payments have not been in accordance with the said decree. That the said Ralph C. Kramer is in arears for the support of the children of the marriage in the sum of \$300.00.

Premises considered, your Petitioner, Mary Elaine Bollinger Kramer Hanson, respectfully prays that this court make an order and decree requiring the said Ralph C. Kramer to be and appear before the court at such time and place as your Honor may direct to show cause, if any he has, why he should not be punushed as for a comtempt. Petitioner will ever pray, etc.

Mary Elaine Bollinger Kramer Hanson

STATE OF ALABAMA BALDWIN COUNTY

Before me, a Notary Public in and for said County and State, personally appeared Mary Elaine Bollinger Kramer Hanson, who being known to me, and being by me first duly sworn, does depose and say she has knowledge of the facts stated in the above petition and that said facts as therein stated are true. May Clamp

El rgen I Tram

Sworn to and subscribed before me on this the 20 day of October, 1961.

BJ.T.

Barsara B: Thomas- Notary Public Beldwin County, Ala, Bay Commission Frances Jee, ed. 1965



ELAINE F	OLLINGER KRAMER,	X	IN THE CIRCUIT COURT OF
	Complainant,	X	BALDWIN COUNTY, ALABAMA
	Vs.	X	IN EQUITY
RALPH C.	KRAMER,	X	
	Respondent.	¥	

RULE TO SHOW CAUSE

Elaine Bollinger Kramer Hanson having filed her verified Petition praying that Ralph C. Kramer be required to appear and show cause, if any he have, why he should not be punished as for a contempt in regard to the nature of the things set out in the verified petition; and upon consideration of said Petition, it is

ORDERED, ADJUDGED and DECREED, by the Court, that the said Ralph C. Kramer appear before the court at <u>10:00</u> o'clock on the <u>28</u> day of <u>Dovember</u>, 1961, in the court room of the Circuit Court in Baldwin County, at Bay Minette, Alabama, and show cause, if any he has, why he should not be punished as for contempt. Let a copy of said Fetition and of this Rule to Show Cause be served forthwith, personally, upon Ralph C. Kramer, by the sheriff of any County where he may be found within this State.

Done this 13 day of November, 1961

Hubert M. Hall Judge, Circuit Court of Baldwin County, Ala.

No and a second

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

15 Bebruary 1951

Mrs. Alice J.Duck Register of the Circuit Court Bay Minette, Alabama

Dear Mrs. Duck:

KRAMER vs- KRAMER: With this we are sending you Bill of Complaint, Answer and Waiver, Agreement, and request that a commission be issued for Mrs. Martha W. McReavy to take testimony. Also, inclosed is check for \$12.50 Court costs.

Yours very truly,

for RICKARBY

EGR,JR.:M Enc. 1123 ELLIOTT G. RICKARBY

EGR, JR.: M

1123

LAW OFFICES

RICKARBY & RICKARBY

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

28 February 1951 (Recopied 3/6/51)

Mrs. Alice J. Duck Clerk of the Circuit Court Bay Minette, Alabama

Dear Mrs. Duck: 2606 - KRAMER -vs- KRAMER: We enclose Note of Submission for Final Decree and 3 copies of the decree of divorce. Please submit these with the other papers to the Judge as soon as possible.

Also, enclosed is testimony taken by Mrs. McReavy, which she has sealed and signed across by her, and a receipt for her commissioner's fee.

We thank you for the prompt handling you give these

Sincerely,

RICK