

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

Circuit Court, In Equity

Case # 2609

LILLIAN W. STUART

, Complainant

vs.

WILLIAM ANDREW STUART

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Conesso~~ 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 heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the

said LILLIAN W. STUART is forever divorced from the

said WILLIAM ANDREW STUART for and on account of Cruelty. It is further

ORDERED, ADJUDGED and DECREED that Complainant have the care and custody of WILLIAM ANDREW STUART, JR., child of the marriage, subject to Respondent's right to the companionship of said child to visit him at reasonable times. It is further

ORDERED, ADJUDGED and DECREED that Respondent furnish to the child of the marriage all needed clothes, school expenses, medical, dental, and optical services and such other incidental expenses as are necessary and proper for the use of a growing boy.

This Court retains control of this cause for such further orders as may from time to time be required for the welfare of the child of the 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 LILLIAN W. STUART the Complainant pay the cost herein to be taxed, for which execution may issue.

This 24<sup>th</sup> day of February, 1951

Jelfair J. Maslberry  
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.

No. 2609

Page       

RECORDED

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

LILLIAN W. STUART

Complainant

vs.

WILLIAM ANDREW STUART

Respondent

**DIVORCE DECREE**

FILED

FEB 24 1951

ANCE L. DUCK, Register

LILLIAN W. STUART,

Complainant

-vs-

WILLIAM ANDREW STUART,

Respondent

NO. \_\_\_\_\_

E Q U I T Y

CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA

TO THE

HONORABLE TELFAIR J. MASHBURN, JR.,

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,

STATE OF ALABAMA: IN EQUITY:

Comes LILLIAN W. STUART and by this her Bill of Complaint presented against WILLIAM ANDREW STUART, respectfully 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 prior to the filing of this Bill, bona fide residents of the State of Alabama.

SECOND: That Complainant and Defendant were married in the State of Mississippi in the year 1945 and lived together, as husband and wife, in Fairhope until January, 1951. In this time a son, William Andrew Stuart, Jr., was born to them, who now resides with Complainant.

THIRD: That the married life of the parties hereto has not been a happy one in that Defendant is a man of quick and violent temper and when angered loses control of himself, and is liable to commit acts of violence. That on two occasions in the past year he has committed actual violence to the person of Complainant, attended with danger to her life and health and from his recent attitude and threats she has reasonable apprehension of continued and increased violence. In the early summer of 1950 Defendant slapped Complainant violently three times, without lawful cause, and again in the late Fall, 1950, struck her repeatedly in the face, knocking her down on the bed and hold<sup>ing</sup> her down with his hand over her mouth and nose until she almost strangled. Later, on Christmas Eve, 1950, while Defendant did not use violence, he threatened her with violence so earnestly that shortly thereafter she left with her child and has since

then lived separate and apart from Defendant, fearing to return lest in a fit of rage he do her serious injury.

THE PREMISES CONSIDERED, Complainant prays that WILLIAM ANDREW STUART be made party defendant to this cause and by proper process required to answer this bill within the time prescribed by law.

The Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from the said WILLIAM ANDREW STUART, giving her the custody and control of the child of the marriage subject to proper rights of visitation and companionship by Defendant, granting her the right to marry again should she so desire, and ordering Defendant furnish the child of this marriage such support and maintenance as the Court shall order, and grant to Complainant such other, further or different relief as to equity may seem meet.

RICKARBY & RICKARBY

By Elliott G. Rickarby  
Elliott G. Rickarby  
Solicitors for Complainant.

RECORDED

NO. 2609

EQUITY

CIRCUIT COURT OF BALDWIN  
COUNTY, STATE OF ALABAMA

LILLIAN W. STUART,

Complainant

-VS-

WILLIAM ANDREW STUART,

Respondent

BILL OF COMPLAINT

FILED

FEB 24 1951

ALICE J. DUCK, Register

RICKARBY & RICKARBY  
Solicitors for Complainant

LILLIAN W. STUART,

NO. \_\_\_\_\_

Complainant

E Q U I T Y

-vs-

CIRCUIT COURT OF BALDWIN COUNTY

WILLIAM ANDREW STUART,

STATE OF ALABAMA

Respondent

DEPOSITIONS OF LILLIAN W. STUART and  
MRS. VIOLA BROWN

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

LILLIAN W. STUART

I am the Complainant in this cause. I am over the age of twenty-one years of age, and am now, and have been a life long resident of Baldwin County. In November, 1945, I married William Andrew Stuart, who has been a resident of Baldwin County since 1921 and by whom I have a son, William Andrew Stuart, Jr., now four years of age.

I had been married previously and have a son by my first husband, who lives with us. My first husband was killed in World War II.

My married life with Mr. Stuart has not been a happy one. My husband has a violent temper and when he flies into a rage, often loses control of himself, which is dangerous. I am very much afraid of him. On two occasion in the past year he struck me. Once in the early summer he slapped me violently three times. Again in the late fall he struck me a number of times in the face, knocking me down on the bed and holding me down with his hand over my mouth and nose until I almost strangled. No other person saw this, but I told about both incidents to my warm friend and neighbor, Mrs. E. W. Brown, who lived close to us, and who had been like a mother to me. I also told Mrs. Brown about a savage quarrel my husband and I had Christmas Eve when he again threatened to do me bodily harm.

With his violent temper, I am afraid to live with my husband any longer for fear that he will do me serious injury. We have not lived together since January, last, and I do not expect to go back to him as my life would not be safe.

Lillian W. Stuart  
Complainant.

MRS. VIOLA BROWN

I am well acquainted with Lillian W. Stuart and William Andrew Stuart, and lived next door to them for two years, about a year after their child was born. Their relations were not pleasant and they would frequently have violent quarrels due to his quick and violent temper. I never saw him strike her, but on two occasions, one early last summer, she told me about her husband having slapped her violently the night before, and again later in the fall of another time when he not only knocked her across the bed, but while she was lying on the bed put his hand over her nose and mouth and almost strangled her. All this had happened but a short time before, I could see from the manner that she was telling me the truth and did not hesitate to believe it from the ugly attitude her husband had shown. She told me of another violent quarrel they had last Christmas Even in which he made threats to her, and she feared that sooner or later he would do her bodily harm. In my opinion she is wise to leave him.

Mrs Viola Brown

Witness

CERTIFICATE

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 Lillian W. Stuart versus William Andrew Stuart, pending on the Equity side of the Circuit Court of Baldwin County, I caused Lillian W. Stuart, the Complainant, and Mrs. Viola Brown, her witness, to appear before me at my office in the Bank Building, Fairhope, Alabama, and where, 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 by each of them.

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

IN WITNESS WHEREOF, I hereto set my hand and seal as commissioner, this the twenty-fourth day of February, 1951.

Martha W. McReavy

Commissioner

NO. 2609

E Q U I T Y

CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA

LILLIAN W. STUART,

Complainant

-vs-

WILLIAM ANDREW STUART,

Respondent

DEPOSITIONS OF LILLIAN W.  
STUART and MRS. VIOLA BROWN

FILED

FEB 24 1951

AMBE L. DUCK, Register

RICKARBY & RICKARBY

Attorneys for Complainant

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY  
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

23 February 1951

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

Dear Mrs. Duck:

STUART -vs- STUART: With this find Bill of Complaint,  
Answer and Waive, Note of Evidence and check for \$12.00  
in your favor for costs, also decrees in subject case.

We ask that you submit this at your earliest convenience ,  
as Judge Mashburn may be tied up next week with Court,  
and the parties, after debating the divorce for a long  
time, are anxious that it be now carried through.

Sincerely,

*Elliott G. Rickarby*  
for  
RICKARBY & RICKARBY

EGR:M

Enc.

3049

LILLIAN W. STUART,  
Complainant,

vs

WILLIAM ANDREW STUART,  
Respondent,

No. EQUITY.

CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

Comes WILLIAM A. STUART, 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.

*William Andrew Stuart*  
Respondent.

Before me, the undersigned Notary, personally appeared WILLIAM A. STUART, who is known to be 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 22nd day of February, 1951.

*Colliott B. Rindaby*  
Notary Public, State of Alabama at large.

RECORDED

NO. 2609

E Q U I T Y

CIRCUIT COURT OF BALDWIN COUNTY

STATE OF ALABAMA

LILLIAN W. STUART,

Complainant

-vs-

WILLIAM ANDREW STUART,

Respondent

ANSWER and WAIVER

FILED

FEB 24 1951

ALICE J. DICK, Register

RICKARBY & RICKARBY  
Solicitors for Complainant

Lillian W. StuartComplainant

vs.

William Andrew StuartRespondent

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,

answer and waiver of Respondent and depositions of  
Lillian W. Stuart and Viola Brown, witnesses for complainant

Ries Carly & Ries Carly  
Solicitors for Complainant

and in behalf of Defendant upon Answer

Wesley. W. Smith

Register.

RECORDED

No. 2609

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

Lillian W. Stearns.

Complainant

VS.

William Andrew Stearns

Respondent.

NOTE OF TESTIMONY

Filed in Open Court this .....

day of February, 1941

FILED  
FEB 24 1941

Register.

Printed by The Baldwin Times

ALICE J. DUCK, Register

LILLIAN STUART KRAMER,  
Complainant,  
vs.  
WILLIAM ANDREW STUART,  
Respondent.

I  
I IN THE CIRCUIT COURT OF  
I BALDWIN COUNTY, ALABAMA  
I IN EQUITY NO. 2609½

ORDER

This day came Lillian Stuart Kramer and filed in this Court a petition under oath praying for an order directed to the Respondent, William Andrew Stuart, to show cause why he should not be punished as for a contempt of this Court, and the Court having considered the same is of the opinion that the Respondent should be given notice of the filing of the petition and of the day upon which the same has been set and that he should be directed to show cause why he is not in contempt of this Court, it is, therefore,

ORDERED and DECREED by the Court that William Andrew Stuart appear before this Court in his own proper person at 9 o'clock A M., on the 5 day of July, 1955, at the Courthouse in Baldwin County, Alabama, then and there to show cause, if any he has, why he should not be punished as for a contempt of the Circuit Court of Baldwin County, Alabama, for and on account of the matters alleged in the petition heretofore filed in this Court by Lillian Stuart Kramer.

It is further ORDERED and DECREED by the Court that a copy of the abovementioned <sup>my decree</sup> petition be attached to this decree be served upon said William Andrew Stuart forthwith by the Sheriff of Baldwin County, Alabama.

Done this 30 day of June, 1955.

Hubert M. Hall  
Circuit Judge.

LILLIAN W. STUART  
COMPLAINANT  
VS  
WILLIAM ANDREW STUART  
RESPONDENT

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

This cause coming on to be heard was submitted upon the petition of the Complainant for an amendment and modification of the original decree, entered in this cause, and the court after hearing the testimony of the Complainant and the Respondent, in open court, is of the opinion that the Complainant should be granted relief.

IT IS THEREFORE, ORDERED, ADJUDGED AND DECREED, by the court, that the decree of divorce heretofore on February 24, 1951, granted in this court be amended and modified so that the same shall read as follows:

"THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

LILLIAN W. STUART Complainant

VS

WILLIAM ANDREW STUART Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, 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 heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said Lillian W. Stuart, is forever divorced from the said William Andrew Stuart for and on account of Cruelty.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Complainant be and she is hereby awarded the custody, care and control of the child, William Andrew Stuart Jr., subject to the right of visitation on the part of the Respondent, at reasonable times.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent pay to the Complainant toward the maintenance and support of the minor child, William Andrew Stuart, Jr., the sum of TEN (\$10.00) DOLLARS per week, payable on Monday of each week, beginning Monday March 3, 1952, and continuing until the further order of this court.

~~IT IS FURTHER ORDERED~~ that the court retain jurisdiction of this cause for such further orders and decrees as from time to time may be necessary.

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 Lillian W. Stuart the Complainant pay the cost herein to be taxed, for which execution may issue.

This 24th day of February, 1951.

Telfair J. Mashburn Jr.  
Judge Circuit Court, in Equity"

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent pay the costs of this proceeding for which execution may issue.

Done at Bay Minette, Baldwin County, Alabama, this the 23rd day of February, 1952.

*Telfair J. Mashburn Jr.*  
JUDGE

26094

m

LILLIAN W. STUART

COMPLAINANT

VS.

WILLIAM ANDREW STUART

RESPONDENT

ATTENDED DIVORCE DECREE

FILED

FEB 29 1952

ALICE J. DUCK, REGISTRAR

LILLIAN W. STUART,

Complainant,

VS.

WILLIAM ANDREW STUART,

Respondent.

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

This day came Lillian W. Stuart, and filed herein her verified petition, praying that William Andrew Stuart 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 things set out in the verified petition; and upon consideration of the said petition, it is

ORDERED, ADJUDGED AND DECREED by the Court that the said William Andrew Stuart appear before the Court at 2:00 o'clock P. M. on the 5th day of February, 1952, in the court room of the Circuit Court of Baldwin County, at Bay Minette, Alabama, and show cause, if any he have, why he should not be punished as for a contempt.

Let a copy of said petition and of this Rule to Show Cause be served forthwith, personally upon the said William Andrew Stuart, by the Sheriff of Baldwin County, Alabama.

Done this 23rd day of January, 1952.

---

Judge

It is further ORDERED, ADJUDGED and DECREED by the Court that this cause be, and the same hereby is, continued until November 7, 1955, at 10:00 o'clock a.m., and that the Respondent pay the costs of this proceeding.

Done this 5th day of August, 1955.

Hubert M. Stael  
Circuit Judge.

LILLIAN STUART KRAMER,	I	
Complainant,	I	IN THE CIRCUIT COURT OF
vs.	I	BALDWIN COUNTY, ALABAMA
WILLIAM ANDREW STUART,	I	IN EQUITY NO. 2609 $\frac{1}{2}$
Respondent.	I	

This being the day heretofore fixed by an order of this Court entered on July 27, 1955, for the hearing of the petition of the Complainant in this cause and now come the parties in open Court and the Court having heard the testimony and examined the parties under oath is of the opinion and so finds that the Respondent, William Andrew Stuart, is in arrears in the payments required to be made by him to the Complainant, Lillian Stuart Kramer, for the maintenance and support of their minor child, William Andrew Stuart, Jr., under and by virtue of the terms of that certain decree entered in this cause on February 23, 1952, and it further appearing to the Court that this cause should be continued for a period of ninety (90) days in order to provide the Respondent with an opportunity to pay to the Complainant the sum of One Hundred Eighty-five Dollars (\$185.00), which amount is the amount that the said Respondent is in arrears under said decree, it is, therefore

ORDERED, ADJUDGED and DECREED by the Court that the Respondent, William Andrew Stuart, pay to the Complainant, Lillian Stuart Kramer, in addition to the sum of Forty Dollars (\$40.00) per month provided in the decree of this Court dated February 23, 1952, the further sum of Twenty Dollars (\$20.00) per month for the next three months, making a total payment of Sixty Dollars (\$60.00) per month and that he also pay to the Complainant during said three-month period or before the expiration thereof the additional sum of One Hundred Twenty-five Dollars (\$125.00).

Lillian W. Stuart  
Complainant

vs

William Andrew Stuart  
Respondent

Circuit Court

Baldwin County

Alabama

In Equity

This day came Lillian W. Stuart and filed herein her verified petition praying for an order upon William Andrew Stuart 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 said William Andrew Stuart do hereby appear before this Court in his own proper person at 10 o'clock in the am noon on the 4 day of June, 1953, in the Courtroom of the Circuit Court of Baldwin County, Alabama, 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 said Lillian W. Stuart.

2. That the Sheriff of Baldwin County, Alabama, do forthwith serve upon the said William Andrew Stuart a copy of this order and of the attached petition and make due return thereof.

Done this 19 day of May, 1953.

Hubert M. Fisher  
Circuit Judge

Lillian W. Stuart  
Complainant

vs

William Andrew Stuart  
Respondent

Circuit Court  
Baldwin County  
Alabama  
In Equity

To the Honorable Hubert M. Hall, Judge of said Court, sitting  
in Equity;

Comes Lillian W. Stuart, Complainant, and respectfully shows  
unto Your Honor as follows;

First: On February 23rd 1952, Your Honorable Court did render  
a decree in the above titled cause.

Second: In said decree the Court ordered said William Andrew  
Stuart to pay Complainant the sum of Ten (10) Dollars, weekly,  
for the support and maintenance of the child, William Andrew  
Stuart, Jr..

Third: That the said William Andrew Stuart, though having the  
financial ability to comply with said decree, has wilfully ne-  
glected and refused to pay said sums to Your Petitioner, being  
presently in arrears in the amount of Fifty (50) Dollars.

The premises considered, Petitioner respectfully prays that this  
Court make an order and decree requiring said William ~~Stuart~~ Andrew  
Stuart to be and appear before the Court at such time and place  
as Your Honor may direct to show cause, if any he have, why he  
should not be punished as for a contempt.

And Your Petitioner will ever pray, etc.

Lillian W. Stuart  
Lillian W. Stuart

State of Alabama  
Baldwin County

Before me, a Notary Public in and for said State and County, per-  
sonally appeared Lillian W. Stuart who, being known to me and being  
by me first duly sworn, doth depose and say that she has knowledge  
of the facts stated in the above petition and that said facts as  
therein stated are true.

Lillian W. Stuart  
Lillian W. Stuart

Sworn to and subscribed before me this 9 day of May, 1953.

L. E. Perkins  
Notary Public, Baldwin County  
Alabama

(Seal)

2609 1/2

Lillian W. Stuart  
City Hall  
vs.  
William Andrew Stuart

Received in Sheriff's Office  
this 21 day of May 1953  
TAYLOR WILKINS, Sheriff

Executed May 27, 1953  
By serving a copy  
of the within  
Order & Petition  
on William  
Andrew Stuart

Taylor Wilkins  
Sheriff  
117. Hall D. S.

FILED  
MAY 27 1953

ALICE J. DICK, Register

LILLIAN STUART KRAMER,  
Complainant,  
vs.  
WILLIAM ANDREW STUART,  
Respondent.

I  
I IN THE CIRCUIT COURT OF  
I BALDWIN COUNTY, ALABAMA  
I IN EQUITY NO. 2609 $\frac{1}{2}$   
I

ORDER

This cause coming on to be heard on the 5th day of July, 1955, the day on which the same was originally set by an order of this Court entered on June 20, 1955, and it having been made to appear to the Court that on said date the Respondent, William Andrew Stuart, had not been served with the petition to show cause why he was not in contempt of this Court and of the order setting said petition down for hearing; and it appearing to the Court that the Respondent was served with a copy of the petition and order by the Sheriff of Baldwin County, Alabama, on July 19, 1955, and that said cause should be set down for hearing on a day certain and continued to said date and that the Respondent should be given notice of the day to which said cause had been continued, it is, therefore

ORDERED and DECREED by the Court that this cause be, and the same hereby is, continued from July 5, 1955, at 9:00 o'clock a.m. until August 5<sup>th</sup>, 1955, at 9:00 o'clock a.m., and

It is further ORDERED and DECREED by the Court that the Respondent, William Andrew Stuart, appear before this Court in his own proper person at 9:00 o'clock a.m. on the 5<sup>th</sup> day of August, 1955, at the Courthouse in Baldwin County, Alabama, then and there to show cause, if any he has, why he should not be punished as for a contempt of the Circuit Court of Baldwin County, Alabama, for and on account of the matters alleged in the petition heretofore filed in this Court by Lillian Stuart Kramer.

It is further ORDERED and DECREED by the Court that a copy of this decree be served upon said William Andrew Stuart forthwith by the Sheriff of Baldwin County, Alabama.

Done this 27 day of July, 1955.

Hubert M. Hall  
Circuit Judge.

LILLIAN STUART KRAMER,  
Complainant,  
vs.  
WILLIAM ANDREW STUART,  
Respondent.

I  
I  
I  
I  
I  
I  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY NO. 2609½

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

Comes your Petitioner, the undersigned Lillian Stuart Kramer,  
and respectfully represents and shows unto your Honor and unto this  
Honorable Court as follows:

FIRST:

That her name is Lillian Stuart Kramer and that she is one  
and the same person as Lillian W. Stuart, the Complainant in that  
certain cause heretofore pending in this Honorable Court by Lillian  
W. Stuart against William Andrew Stuart, who is one and the same  
person as the Respondent herein.

SECOND:

That on February 24, 1951, this Honorable Court entered  
a decree for divorce in favor of your Complainant against the said  
William Andrew Stuart, for and on account of cruelty and did, in  
and by the terms of said decree, require the said William Andrew  
Stuart to furnish the child of their said marriage, William Andrew  
Stuart, Jr., all needed clothes, school expenses, medical, dental  
and optical services and such other incidental expenses as were nec-  
essary and proper. That this Honorable Court did, on February 23,  
1952, amend and modify the decree dated February 24, 1951, and in  
and by the terms of said decree as modified required the Respondent  
to pay to your Complainant for the support of the said William Andrew  
Stuart, Jr., the sum of Ten Dollars (\$10.00) a week.

THIRD:

That the Respondent has for the past several weeks failed and refused to pay to your Complainant the said sum of Ten Dollars (\$10.00) per week and your Petitioner is in need of said funds for the proper support and maintenance of the said William Andrew Stuart, Jr. That the Respondent is now in arrears in the amount of, to-wit: One Hundred Forty Dollars (\$140.00).

PRAYER FOR PROCESS:

The premises considered, your Petitioner respectfully prays that the Respondent be given notice of the filing of this petition and of the day upon which the same shall be set.

PRAYER FOR RELIEF:

Your Petitioner respectfully prays that this Honorable Court will enter an order directed to the Respondent herein requiring him to appear before this Court and show cause why he should not be punished as for a contempt of this Honorable Court on account of his failure to make the payments required as set out above.

Respectfully submitted,

Lillian Stuart Kramer  
Lillian Stuart Kramer

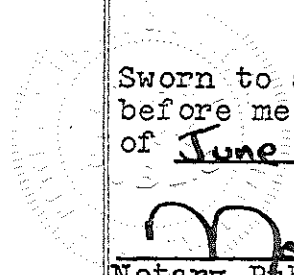
STATE OF ALABAMA  
BALDWIN COUNTY

Before me, Norborne C. Stone, Jr., a Notary Public in and for said County in said State, personally appeared Lillian Stuart Kramer who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That she is the Complainant in the foregoing petition and that her name is signed thereto and that the facts alleged in said petition are true and correct.

Lillian Stuart Kramer  
Lillian Stuart Kramer

Sworn to and subscribed  
before me this 16<sup>th</sup> day  
of June, 1955.



Norborne C. Stone, Jr.  
Notary Public, Baldwin County, Ala.

23 February

19 51

*Received from* Rickarby & Rickarby

Three and no/100 - - - - - *Dollars*

Commissioner's fee for taking depositions in Stuart vs Stuart

\$3.00

*Martha W. McReavy*

Martha W. McReavy