

DIVORCE DECREE

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

MYRTLE SUE WATSON, Complainant

vs.

BILLY EDWARD WATSON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confession on~~  
~~answer and waiver~~ and Testimony as noted by the Register, and upon con-  
sideration 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

MYRTLE SUE WATSON is forever divorced from the  
said BILLY EDWARD WATSON for and on account of  
Abandonment

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the complainant, Myrtle  
Sue Watson shall be and she is hereby awarded the permanent care, custody  
and control of the minor child, William Edward Watson.

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 Myrtle Sue Watson  
the complainant pay the cost herein to be taxed, for which execution may issue.

This 3 day of November, 1953

*Hubert M. Hall*

Judge Circuit Court, In Equity.

I, \_\_\_\_\_, Register of the Circuit  
Court of Baldwin County, Alabama, do hereby certify that the fore-  
going 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. 3135 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

NOV 3 1953

ALICE I. DUCK, Register

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Billy Edward Watson, 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 Myrtle Sue Watson, as complainant.

WITNESS my hand this \_\_\_\_\_ day of November, 1953.

Register

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MYRTLE SUE WATSON,	)	IN THE CIRCUIT COURT OF
Complainant,	)	BALDWIN COUNTY, ALABAMA
vs.	)	IN EQUITY.
BILLY EDWARD WATSON,	)	
Respondent.	)	

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

Your complainant, Myrtle Sue Watson, 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, Alabama, and over twenty-one years of age.

2.

That your complainant and the respondent married in Pensacola, Florida, March 19, 1946, and lived together as husband and wife in Baldwin County, Alabama, until on, to-wit, May 10, 1948, and that Baldwin County has been the home of the complainant for more than two years the next preceding.

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 any way recognized each other as husband and wife.

4.

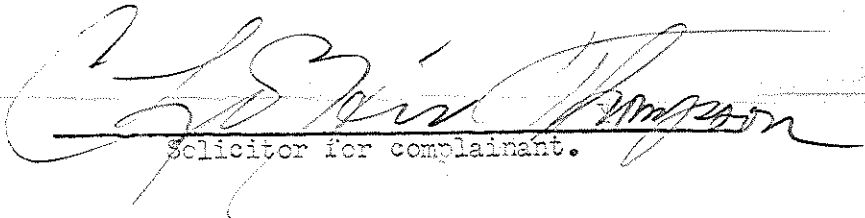
There was born as fruits of this marriage between the complainant and the respondent one child, William Edward Watson, age 6. That the mother of said

child is a suitable, fit and proper person to have the care, custody and control of said child.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper procedure make the said Billy Edward Watson party respondent to this bill of complaint requiring him 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.

Your complainant further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between your complainant and the respondent.

That the care, custody and control of the child be awarded to the complainant, and that no maintenance, support or alimony is requested, and that upon a final hearing of this cause, that your complainant be awarded such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for complainant.

no 3136'

~~RECORDED~~ *Sue Watson*

vs.

*Billy Edward Watson*

*Bill of Complaint*

FILED

NOV 2 1953

ALICE J. DUCK, Register

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Helen H. Little

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 Myrtle Sue Watson and Adolph Mosley

as witnesses in behalf of Myrtle Sue Watson in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Myrtle Sue Watson

Complainant  
and Billy Edward Watson

Respondent

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

Witness 2nd day of Nov, 1955

Register.

Commissioner's Fee, \$

Witness' Fees, \$

**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

MYRTLE SUE WATSON

Complainant

VS.

BILLY EDWARD WATSON

Respondent

I, Helen H. Little

as Register and Commissioner

have called and caused to come before me Myrtle Sue Watson and Adolph Mosley

witness<sup>es</sup> named in the Requirement for Oral Examination, on the 2nd day of November  
19453, at the office of C. LeNoir Thompson

in Bay Minette, Alabama, and having first sworn said Witness<sup>es</sup> to speak the  
truth, the whole truth, and nothing but the truth, the said Myrtle Sue Watson and Adolph  
Mosley doth depose and say as follows:

That my name is Myrtle Sue Watson, I am over the age of 21, and resident of Baldwin County, Alabama, and have been since birth, the Respondent is also over the age of 21, and was a resident of Alabama more than two years next proceeding, we were married in Pensacola, Florida on March 19, 1946, and lived together as husband and wife until on-towit or about May 10, 1948 at which time I was voluntarily abandoned by the respondent without fault on my part, and we have not lived together as husband and wife since that day. There was born as fruits of this marriage, one child, William Edward Watson, age 5, who has been in my care, custody, and control since birth, I believe that I am a suitable, fit, and proper person to have the permanent care, custody, and control of my child, and ask the court to grant such to me. I am sure we will never live together again as husband and wife.

Myrtle Sue Watson

That my name is Adolph Mosley, I know both parties to this cause, they are both over the age of 21, and residents of Alabama they were married in Pensacola, Florida on March 19, 1946, and lived together as husband and wife until the first part of May, 1948, at which time Myrtle Sue was abandoned without fault on her part they have not lived together as husband and wife since that time, I believe that Myrtle Sue is a fit, suitable, and proper person to have the permanent care, custody, and control of William Edward Watson, borned as fruits of their marriage I do not believe they will ever live together again as husband and wife.

ADOLPH. MOSELEY

ORAL EXAMINATION.

I, Helen H. Little, as Register and Commissioner hereby certify that the foregoing deposition son 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 \_\_\_\_\_

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 witness \_\_\_\_\_; 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 2nd day of November, 194 53

Helen H. Little (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed \_\_\_\_\_, 194 \_\_\_\_\_

FILED

NOV 2 Recorded in

Register.

ALICE J. BUCK, Register

Vol. \_\_\_\_\_

Page \_\_\_\_\_

Register.



MYRTLE SUE WATSON

VS.

BILLY EDWARD WATSON

THE STATE OF ALABAMA  
Baldwin CountyIN 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 testimony of Myrtle Sue Watson

and Adolph Mosley.

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

  
Register.

MERTLE SUE WATSON

COMPLAINANT

VS

BILLY EDWARD WATSON

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, marriage and residence, but denies all other allegations contained in the bill of complaint, and demand strict proof of the same.

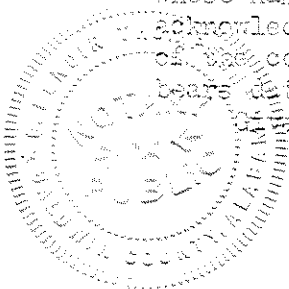
The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Billy Edward Watson

STATE OF ALABAMA  
BALDWIN COUNTY

I, C. E. Win Thompson, a Notary Public, in and for said County, in said State, hereby certify that Billy Edward Watson, 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, he executed the same voluntarily on the day the same bears date.

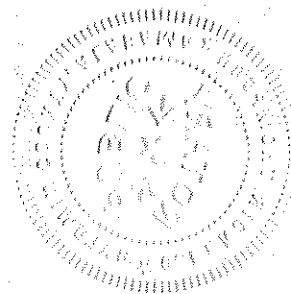
Given under my hand and seal on this the 2 day of April, 1953.



C. E. Win Thompson  
Notary Public, Baldwin County, Alabama

RECORDED

3138



FILED  
NOV 2 1953  
ALICE J. ROCK, Register