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DIVORCE DECREE		Printed by Moore Printing (
THE STATE	OF ALABAMA, B	ALDWIN COUNTY
CIRC	CUIT COURT, IN	
	Lavern Drew	, Complainant
	vs.	
	Donald E. Drew	, Respondent
This cause coming on to b	e-heard-was-submitted-upon	Bill of Complaint, Brown BrexConferso
Answer and waiver	and Testimony	as noted by the Register, and upon co
sideration thereof, the Court is of the said bill.	he opinion that the Complain	nant is entitled to the relief prayed for
It is therefore ordered, adjud	lged and decreed by the Cou	rt that the bonds of matrimony heretofo
existing between the Complainant a	ind Defendant be, and the sa	ame are hereby, dissolved, and that the sa
Lavern Drew		is forever divorced from t
said Donald E. Brew		for and on account
		ND DECREED, that the Complainant ody and control of Eddie Farron
Drew.	ranted the care, cust	bdy and control of Eddle Farron
	ADJUDGED AND DECREED	that the Respondent, Donald E.
and maintenance of the		llars per month for the support
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It is further ordered, adjudge	ed and decreed that neither J	party to this suit shall again marry exce
to each other until sixty days after	the rendition of this decree,	and that if appeal is taken within six
days, neither party shall again marr	ry except to each other duri	ng the pendency of said appeal.
It is further ordered that the	Complainant and Responde	nt be, and they are hereby permitted
again contract marriage upon the pa		
It is further ordered that		
the Respondent	pay the cost herein to	be taxed, for which execution may issue
Thisday of	- Jannary	
		a no tall
	<u>ta for som ander som a</u>	
		Judge Circuit Court, In Equit
Ŧ		
1,		y, Alabama, do hereby certify that the for
	going is a correct copy	of the original decree rendered by the Jud
		the above stated cause, which said decr
	is on file and enrolled ir	-
	Witness my hand	and seal this thed
	of	, 19
		Register of Circuit Court, In Equit
190		register of cheat court, in Equit

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	8581. NOTE OF TESTIMONY	
	Lavern Drew	
		THE STATE OF ALABAMA
·		Baldwin County
	vs. Donald E. Drew	
		IN EQUITY
		Circuit Court of Baldwin Cour
		4 en
ogen - megennetternegene	This cause is submitted in behalf of Complaint agreement of complainant and respondent, and Lena Mae Crawford	
•		
	and in behalf of Defendant uponagreement of Co	omolainant and respondent and answer
	and in behalf of Defendant upon <u>agreement</u> of Co and waiver of Respondent.	omolainant and respondent and answer
		omolainant and respondent and answer

W		-
No. 8190		
THE STATE OF ALABAM Baldwin County		
IN EQUITY Circuit Court of Baldwin Co	unty	
LavernDrew		
Donald E. Drew		
NOTE OF TESTIMONY Filed in Open Court this		
day of the first o	94	
ALICE I. DICK, Register Regist Printed by the Baldwin Times	er.	

STATE OF ALABAMA

BALDWIN COUNTY

There is now pending a divorce proceedings in the Circuit Court of Baldwin County, Alabama, in which Lavern Drew is the Complainant and Donald E. Drew is the Respondent.

There was born to this union a child Eddie Farron Drew, who is less than a year old. It is now (nutually agreed by the Parties to this suit thatis, Lavern Drew and Donald E. Drew, that Lavern Drew, shall have the premanent care, control and custody of the said child with the right of reasonable visitation by Donald E. Drew. It is further agreed that Donald E. Drew shall pay Lavern Drew for the support of the said child the sum of \$20.00 per month for its care and maintenance. It is agreed that Lavern Drew does not now and shall not ask Donald E. Drew for alimony and support for herself.

It is the further understanding and agreement of the parties hereto that this agreement shall be for a period of six years at which time further agreement for the support of the said child shall be made.

It is the desire and wish of the parties to this agreement that the Court take cognizance of this said agreement and make it a part of the divorce proceedings.

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Donald & Drew

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	LA VERN DREW COMPLAINANT VS DONALD E. DREW RES PONDENT AGREEMENT	 mot werd Stanol des tor threather are and to the set of the	

LAVERN DREW	Ō
COMPLAINANT	IN THE CIRCUIT COURT OF
VS	BALDWIN COUNTY, ALABAMA, 0
DONALD E. DREW	IN EQUITY
RES PONDENT	0

Now comes the Respondent, in his own proper person, and admits the allegations contained in the bill of complaint filed in the above stylez cause, as to ages, residence, and marriage, but denies all other allegations contained therein and demands strict proof of the same.

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

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STATE OF ALABAMA BALDWINCOUNTY I A Dellient M Bronele

County in said State, hereby certify that Donald E. Drew, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date. Given under my hand and seal on this the **33.** day of January, 1954.

Ellert Bra - iles otary Public, Baldwin County, Alabama.

103190 LAVERN DREW • COMPLAINANT VS DONALD E. DREW RES PONDENT نې س ANSWER AND WAIVER and ad impo JAN 43 195 4 JAN 43 195 4 MIGE J. DUCK, Register

STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons DONALD E. DREW to appear and plead, ansæer 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 LAVERN DREW, as Complainant and against Donald E. Drew, as Respondent.

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WITNESS my hand this the _____ day of January, 1954.

		Register
LAVERN DREW	Ò	
COMPLAINANT	Ø	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
VS	Q.	
DONALD E. DREW	Q	IN EQUITY
RESPONDENT	\Diamond	

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

Your Complainant, Lavern Brew, respectfully represents and shows unto Your Honor and this Honorable Court as follows:

٦.

That your Complainant is a bona fide resident citizen of Baldwin County, Alabama, and have been for more than two years next preceding the filing of this bill of complaint, and sixteen years of age; that the Respondent is a bona fide resident citizen of the State of Alabana, and nineteen years of age.

2.

That your Complainant and the Respondent married at Bay Minette, Alabama, on March 6, 1953, and lived together as husband and wife until on to-wit, November 12, 1953.

3.

That on to-wit, November 12, 1953, and on various occasions prior thereto the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person which would necesarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent one child, Eddie Farron Drew, now less than one year old, who is now and has been all of his life with his mother, the Complainant; that your Complainant is a suitable, fit and proper person to have his care, custody and control.

That the parties hereto have made an agreement as to the care, custody and control of the minor child, Eddie Farron Drew.

5.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said Donald E.Drew, 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 a final hearing hereof Your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that Your Complainant be awarded the permanent care, custody and control of the minor child, Eddie Farron Drew; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

WILTERS & BRANTLEY

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	COMMISSION TO TAKE DEPOSITIONS	
	THE STATE OF ALABAMA,	
		CIRCUIT COURT
	Baldwin County.	
	TO:Evelyn Watts	
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		your prudence and competency, have appointed yo
		horize you, at such time and place as you may appoint
	to call before you and examine Lavern Dre	w and Lena Mae Crawford
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	as witnesses in behalf of <u>Complainant</u>	in a cause pending in ou
	Circuit Court in Baldwin County, of said Stat	e. wherein Lavern Drew
:		
		, Complainant
		, complainant.
	and Donald E. Drew	
		Respondent
•		_
	on oath, to be by you administered, upon	Davern Dren end Bena hae oranzes a
	to take and certify the deposition of the w	ritness and return the same to our Court, with a
	convenient speed, under your hand.	
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	Commissioner's Fee, \$	
	Witness' Fees, \$	
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Baldwin County CIRCUIT COURT Lavern Drew Complainant- VS. Donald E., Drew Defendant-				and a state of the second second second
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Lena Mae Crawford	Lavern Drew			
	Lena Mae Crawford			

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	Date	lwin County.	ļ	(In Equity)	
		Lave	ern Drew VS.	Complainant	
		Done	ald E. Drew	Respondent	
	I,Evelyr	Watts			
	as Reguierand Co	mmissioner		. · ·	
	have called and ca	used to come before m	e LavernDrew and	Lena Mae Crawford	
· .			<u>, , , , , , , , , , , , , , , , , , , </u>		·
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	194 <u>54</u> , at the of	fice of <u>Wilters</u> and	l Brantley	on the <u>23</u> day of <u>Januar</u>	
	in <u>Bay Minette</u> truth, the whole tr Czawford	ruth, and nothing but t	he truth, the said $\frac{1}{2}$	sworn said Witness <u>es</u> to s avern Drew and Lena Mae	-
			epose and say as folk I am the Complai	nant in the above style	d cause
	I am a bona for more th of complain of Alabama. old.	fide resident cit an two years next t. That the Respo That I am sixtee	tizen of Baldwin C preceding the tim ondent is a bona f en years old and t	ounty, Alabama, and hav we of the filing of this 'ide resident citizen of the Respondent is ninete	e been bill the St en year
	March 6, 19 now less th That o in an intox threatened	53. That there wa an one year old. n or about November icated condition. at that time to ta	s born to this un 12, 1953, Donal While there he unke our child's li	Bay Minette, Alabama, ion Eddie Farron Drew, d came to my mother's h sed very rought languag fe and threatened to tak very reasonable apprehen	a child ouse e and ke
	that He wou live withhi	ld carry out his t	chreats. I do not Safety or comfor	believe I can continue t. I have not lived wi	to
	ې د د د مېر			um. Drew	
	tan Tana Santa Tana Santa Tana Santa		. <u> </u>	un v reis	······
		e is Lena Mae Craw	ford Tom the m	other of Lavern Drew. I	lenow
	and have be Drew is a r more than t	and Donald are bo en for more than t esident Citizen of wo years next prec	th resident citiz wo years next pre Baldwin County, eding this time.	en of the State of Alaba ceding this time. Laver Alabama, and have been f I know that the Respond	ama rn for Jent
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the foreg	oing	deposition s	n Oral	Exar	nination	was	taken	down b	oy me	in v	vriti	ng ir	n the	words	;
of the wi	tness.	esand re	ad over	to	them	and_	they	signe	d the	sam	e in	the	prese	nce of	Ē
myself	and	Tolbert M.	Brant	ley											-

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness <u>es</u> or had proom made before me of the identity of said witness <u>es</u>; 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.

Filed

)eposition

Respondent.

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Record

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Register

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Register

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January 54 194 Given under my hand and seal, this_

Donald E. Drew

VS.

Complainant

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IN CIRCUIT COURT, IN EQUITY.

Lavern Drew

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PAGE

THE STATE OF ALABAMA BALDWIN COUNTY STATE OF ALAPAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons DONALD E. DREW 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 LAVERN DREW, as Complainant and against Donald E. Drew, as Respondent.

WITNESS my hand this the _____day of January, 1954.

	Register
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LAVERN DREW	IN THE CIRCUIT COURT OF
COMPLA INANT	Q BALDWIN COUNTY, ALABAMA,
VS	(IN EQUITY
DONALD E. DREW	Q
RESPONDENT	Q

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

Your Complainant, Lavern Drew, respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident citizen of Baldwin County, Alabama, and have been for more than two years next preceding the filing of this bill of complaint, and sixteen years of age; that the Respondent is a bona fide resident citizen of the State of Alabana, and nineteen years of age.

2.

That your Complainant and the Respondent married at Bay Minette, Alabama, on March 6, 1953, and lived together as husband and wife until on to-wit, November 12, 1953.

3.

That on to-wit, November 12, 1953, and on various occasions prior thereto the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give

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your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent one child, Eddie Farron Drew, now less than one year old, who is now and has been all of his life with his mother, the Complainant; that your Complainant is a suitable, fit and proper person to have his care, custody and control.

5.

That the parties hereto have made an agreement as to the care, custody and control of the minor child, Eddie Farron Drew.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said Donald E.Drew, 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 a final hearing hereof Your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that Your Complainant be awarded the permanent care, custody and control of the minor child, Eddie Farron Drew; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receave.

WILTERS & BRANTLEY

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That there was born to the marriage between your Cor lainant and the Respondent one child, Eddie Farron Drew, now less than one year old, who is now and has been all of his life with his mother, the Complainant; that your Complainant is a suitable, fit and proper person to have his care, oustody and control.

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That the parties hereto have made an agreement as to the care, custody and costrol of the mimor child, Eddie Farron Prow.

WHFEHMORE, the premises considered, your Compleinant mays that Your Foner will by proper process make the said Donald E.Drew, curty despondent to this bill of compleint requiring his 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 when a final hearing here of Your Honor will enter a decree forever barring the bonds of matrimony sister between your Complainant and the Respondent; that Your Complainant be awarded the permanent care, custody and control of the minor child, Edui Farron Drew; Your Complainant neaves for such other, further, Hiftrent or general relief as she may be in equity and good conscience entitled to receive.

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