The State of Alabama, Baldwin County

Circuit Court, In Equity

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The State of Alabama BALDWIN COUNTY

In Circuit Court, In Equity

Carrie Belle Hance

Complainant

vs.

Keith Leroy Hance

Respondent

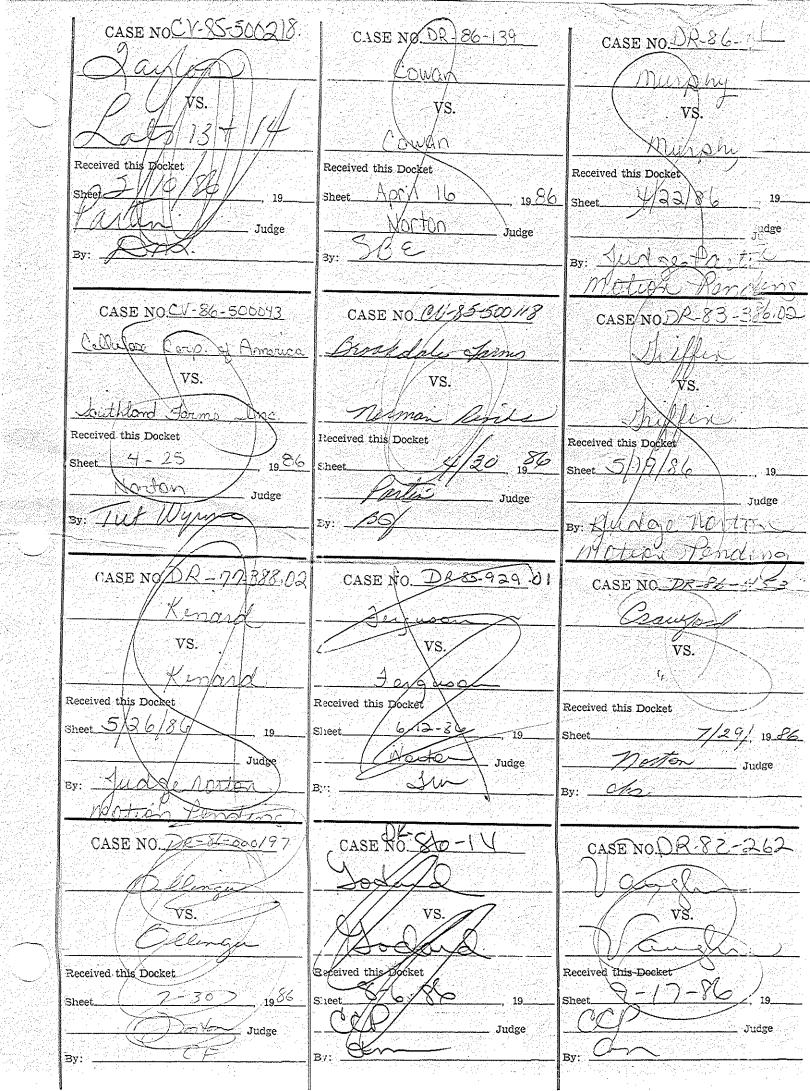
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CARRIE BELLE HANCE

COMPLAINANT

VS

VS

RESPONDENT

O

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAWA,

IN EQUITY

O

IN EQUITY

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

The Respondent admits the allegations as to marriage, ages and residents, but denies all other allegations contained in the bill of complaint and demands 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 examined Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

STATE OFFICRIDA D. C. Suggs

Justice of Peace

I, District No. 3, a Notary Public, in and for said County, in said Baydon, Flagge by certify that Keith Lercy Rance, 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 said instrument, he executed the same voluntarily on the day the same beaus data.

ment, he executed the same voluntarily on the day the same bears date. Given under my hand and seal on this the 24 day of April, 1951.

Justice of Peace

District No. 3 Bay Co. Florida

Keith Lerm Hance

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CARRIE BELLE HANCE

COMPLAINANT

KEITH LEROY HANCE

ANSWER AND WAIVER

FILED MAY 14 1951 ALIGE I. MICK, Rugisley

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

	<u> Carrie B</u>	Plle Hance	C	Complainant	
		VS.	en en la composition de la composition	•	
	Ceith Le	ov Yange	R	Respondent	
I,					
as:Register and Commissioner					
have called and caused to come	before me	urrie Belle	Hance and	Bessie Capers	- ,
			·······	·	
The second secon					
witness and named in the Requ 194: 51, at the office of High		Examination	, on the <u>72</u>	day of Max	
in <u>Pay Minette</u>	, Alabama, an	d having first	t sworn said	Witness es to spe	ak the
truth, the whole truth, and noth					······································
Bessie Hance	doth depose a	nd say as foll	ows:		

My name is Garrie Belle Hance. I live at Loxley, Baldwin County, Alabama, where I have lived all my life. I am 16 years of age. The Respondent, Reith Leroy Hance, is over twenty-one years of age and presently residing in Panama City, Fla.

residing in Panama City, Fla.

The Respondent and I married at Bay Minette, Alabama, on February 5, 1949. We lived together as husband and wife until March 1951. The Respondent, after our marriags, on several ocassions threatened and abused me and did actual violence to my person which necessarily endangered my life and health. He or one ocassion beat me up to the extent that it was necessary for me to go to Holmes Hospital in Foley for treatment. The conduct of the respondent was such as to render it absolutely impossible for the bolive with him. The conduct of the espondent was such asto give me every reasonable apprehension to believe and I did actually believe that if I tried to live with him he would do further violence to my person which would necessarily endangered my life and health. The Respondent and I have no children. I know that I can never live with him.

Carrie Bell Hone

Bessie Capers, a witness for the Complainant being first duly sworn, deposes and says. Iem personally acquainted with the Complainant and the Respondent in this cause. I know of my own personal knowledge that the Respondent often whil they were living together mistreated the Complainant and did actual violence to her person by choking her. I know that the conduct of the Respondent was such that the Complainant had every ressonable apprehension to believe that he would carry out his threats and do further violence to her person which would hecessarily endanger her life and health. The conduct of the Respondent toward the Complainant was such as to render it absolutely impossible for them to live together.

ma Ressie Copera

ORAL EXAMINATION.

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, as Register and Commissioner hereby certify that
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and they signed the same in the presence of
have personal knowledge of personal identity of
f the identity of said witness es; that I am not of
ause, or any manner interested in the result thereof
nvelope to the Register of said Court.
_day of, 1945]
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THE STATE OF AI	
IN CIRCUIT COURT,	IN EQUITY.
CarrieBelle Hance	
vs. Keith Leroy Hance	Complainant
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THE STATE OF ALABAMA **Baldwin County**

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THE STATE OF ALABAMA Baldwin County

CIRCUIT COURT

Carrie Belle Hance

Complainant_

VS.

Keith Leroy Hance

Defendant_

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

<u> Carrie Belle Hance</u>

Bessie Capers

STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

YOU are hereby commanded to summons KEITH LEROY HANCE to appear and plead, answer or demur within thirty days from the service bereof, to the bill of complaint filed in the Circuit court of $^{\rm B}$ aldwin County, Alabama, in Equity, by Carrie Belle Hance, as $^{\rm C}$ omplainant and against Keith Leory Hance, as Respondent.

		Register
CARRIE BELLE HANCE	X	نشان کی کونا کیست کی کی در در در در کار کرد کی کرد در کی کرد مرکز کی در
complainant vs	◊	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,
KEITH LERCY HANCE	Q	in remita
RES PONDENT	Ž.	

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

Your Complainant, Carrie Belle Hance, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over sixteen years of age, a bona fide resident of Baldwin County, Alabama, and has been all of her life; that the Respondent is over twenty-one years of age and presently residing in Panama City, Florida.

2.

That your Complainant and the Respondent married in Bay Minette,

Alabama, on February 5, 1949, and lived together as husband and wife

until in Warch 1951.

3.

That in Warch 1951 and on various ocassions while they were living together as husband and wife the Respondent threatened and abused the Complainant and did actual violence to her person which necessarily endangered her life and health; that the conduct of the Respondent was such as to give her every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do further violence to her person which would necessarily endanger her life and health.

That the Complainant and the Respondent have no children and no community property.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Keith Leroy Hance party Respondent to this cause of exitor, required and in the penalties prescribed by law and the practice of this fonorable Court.

Your Complainant prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the respondent; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Solicitor for the Complainant

m 2643

CARRIE BELLE HANCE

COMPLAINANT

7S

KEITH LEROY HANCE

RESPONDENT



BILL OF COMPLAINT

FILED MAY 14 1951

ALICE J. DUCK, Register