

(3310)

DIVORCE DECREE

Printed by Moore Printing Co.

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

BARBARA HOUGHTALING SEYMOUR

, Complainant

vs.

JOHN S. SEYMOUR

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer & 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

Barbara Houghtaling Seymour

is forever divorced from the

said John S. Seymour

for and on account of

Cruelty

It is further ordered, adjudged and decreed by the Court that the Complainant be and she is hereby given the right to resume the use of her maiden name, Barbara Houghtaling.

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 Barbara Houghtaling Seymour

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

This 2 day of August, 1958

Hubert M. Hill

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. 331-0 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

MARY ANN ROBERT LIND SIZICUR

Complainant

vs.

JOHN S. SIZICUR

Respondent

DIVORCE DECREE

FILED

AUG 2. 1954

ALICE L. DUCK, Register

BARBARA HOUGHTALING SEYMOUR

vs.

JOHN S. SEYMOUR

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

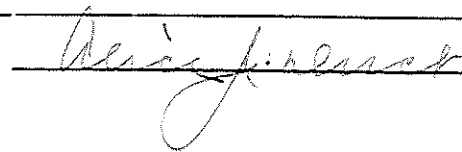
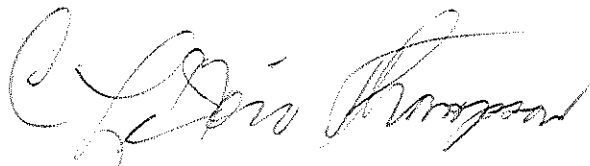
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____

~~Answer, waiver and testimony of witnesses, Barbara Houghtaling Seymour and~~

J. Forte

and in behalf of Defendant upon _____



Register.

No. 3311D.....

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

BARBARA HIGHTALING SEYMOUR

vs.

JOHN S. SEYMOUR

NOTE OF TESTIMONY

Filed in Open Court this 2^{8th}

day of July, 1947

Register.

Printed by the Baldwin Times

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons John S. Seymour 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 Barbara Houghtaling Seymour as Complainant and against John S. Seymour, as Respondent.

Witness my hand this the ____ day of June, 1954.

Register.

BARBARA HOUGHTALING SEYMOUR,
COMPLAINANT,
VS
JOHN S. SEYMOUR,
RESPONDENT.

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

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

Your Complainant, ~~Barbara Houghtaling Seymour~~, respectfully represents
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 are both over the age of twenty-one.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi,
on January 1, 1954, and lived together as husband and wife until on, to-wit,
April 15, 1954.

3.

That on, to-wit April 15, 1954, and on several occasions prior thereto
the Respondent threatened and abused the Complainant and threatened to
do actual violence to her person which would necessarily endanger her
life and health. The conduct of the Respondent was such as to give the
Complainant 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 actual violence to her person, which would necessarily endanger
her life and health.

That the Complainant and the Respondent have no children as fruits of this marriage, and there is no property to be divided.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said John S. Seymour, party Respondent to this cause of action, 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.

Complainant further 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, and will grant the Complainant the right to resume the use of her former name, Barbar Houghtaling; that she be granted such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant.

no 3310

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

BARBARA HOUGHTALING SEYMOUR,

COMPLAINANT,

VS

JOHN S. SEYMOUR,

RESPONDENT.

Summons & Complaint

FILED
JUL 28 1954

ALICE J. DUCK, Register

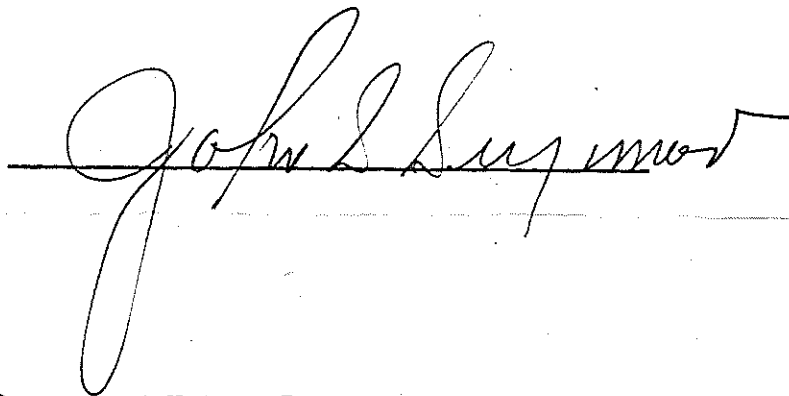
C. LeNoir Thompson
Attorney At Law
Day Minette, Alabama

BARBARA HOUGHTALING SEYMOUR, § IN THE CIRCUIT COURT OF
 § BALDWIN COUNTY, ALABAMA
 § IN EQUITY
VS §
JOHN S. SEYMOUR, §
 §
 § RESPONDENT

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

The Respondent admits the allegations as to ages and marriage and residence, 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 of 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.

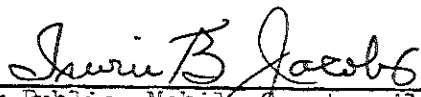


STATE OF ALABAMA

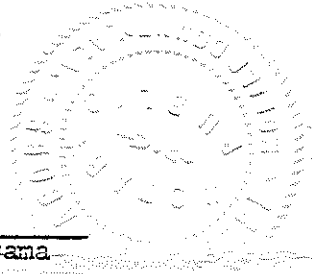
MOBILE COUNTY

I, Irvin B Jacobs, A Notary Public, in and for said County, in said State, hereby certify that John S. Seymour, 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 27th day of July, 1954.


Notary Public, Mobile County, Alabama

My Commission Expires May 12th 1956



m3318

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

BARBARA HOUGHTALING SEYMOUR,
COMPLAINANT,

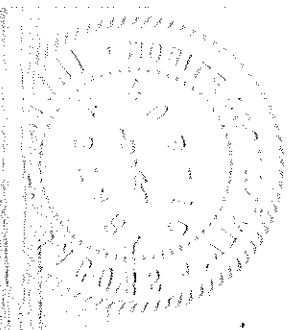
VS

JOHN S. SEYMOUR,
RESPONDENT.

Answer & Waiver

FILED
JUL 28 1954

ALICE J. DUCK, Register
C. LeRoy Thompson
Attorney At Law
Day Minette, Alabama



NOTED

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Lyrleene Nixon

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 Barbara Houghtaling Seymour and L. Forte

as witnesses in behalf of Barbara Houghtaling Seymour in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Barbara Houghtaling Seymour

_____, Complainant
and John S. Seymour

_____, Respondent

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

Witness 28th day of July, 1954

Desire J. French
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

BARBARA HOUGHTALING SEYMOUR

Complainant

VS.

JOHN S. SEYMOUR

Respondent

I, Lyrlene Nixon
as Register ~~and Commissioner~~

have called and caused to come before me Barbara Houghtaling Seymour and L. Forte

witness named in the Requirement for Oral Examination, on the 28 day of July
1954, at the office of C. LeNoir Thomson
in Bay Minette, Alabama, and having first sworn said Witness^{es} to speak the
truth, the whole truth, and nothing but the truth, the said Barbara Houghtaling Seymour
and L. Forte doth depose and say as follows:

That my name is Barbara Houghtaling Seymour, I am over the age of 21 and a resident of Baldwin County, Alabama, and have been more than two years next preceding year. The Respondent, John S. Seymour, is a resident of Alabama, and has been more than two years next preceding year, but is temporarily residing in Mobile, Alabama. We were married on January 1, 1954, at Lucedale, Mississippi, and separated on April 15, 1954, in Baldwin County, Alabama. We have not lived together since that date, the cause of the separation was the abusive treatment given me and on several occasions when the Respondent was drinking he endangered my life or health, so that on this last occasion because of his conditions and the treats of bodily harm, which he made caused me to be in fear of my life or health, as I was afraid he would carry out those threats and I was afraid to continue to live with him. I know that I shall never live with him anymore as his wife and respectfully ask this Honorable Court for a divorce. There are no children as fruits of this marriage and no property to be divided. I respectfully ask this Honorable Court for the right to resume the use of my maiden name, Barbara Houghtaling.

Barbara Houghtaling Seymour

That my name is L. Forte, I know both parties to this cause they are both over the age of 21 and are residents of Alabama and have been more than two years next preceding year. They were married in Lucedale, Mississippi, on January 1, 1954, and lived together in Alabama as husband and wife until the last separation on or about the 15th of April, when the Complainant was forced to leave the Respondent in fear of her life or health. She had become afraid because of the previous abusive treatments given her that on or about April 15th when he made further threats to do her bodily harm she was afraid those threats would be carried out, and fearing her life or health left him, she has not lived with him anymore since that day as far as I know. I do not believe that they will ever live together again as husband and wife. There are no children as fruits of this marriage.

L. Forte

ORAL EXAMINATION

I, Lurleene Nixon, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition s on 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 and C. Lohr Thompson

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 ES; 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 28 day of July, 1954
Lurleene Nixon (L. S.)

No. <u>3310</u>	Page _____
The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
<u>BARBARA HONORABLE SEYMOUR</u>	
vs.	Complainant
<u>JOHN S. SEYMOUR</u>	Respondent
Oral Deposition	
Filed <u>FILED</u>	, 19 <u>54</u>
<u>Jul 28 1954</u>	Register
<u>ALICE H. AMCK, Attest</u>	
Vol. _____	Record _____
Page _____	Register _____