

DIVORCE DECREE

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

GRACE LOUISE PLEMONS, Complainant

vs.

RUDIE C. PLEMONS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confession~~
~~Respondent's 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

GRACE LOUISE PLEMONS is forever divorced from the
said RUDIE C. PLEMONS for and on account of

CRUELTY

It is further ordered, adjudged and decreed that the care, control and
custody of the minor children, R. B. Plemons, Carlene Plemons and Gale
Plemons be in the mother the complainant until further orders of this
Court.

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

This 7th day of September, 1955

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. 3344 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

GRACE LOUISE PLEMONS
Complainant

vs.

RUDIE C. PLEMONS
Respondent

DIVORCE DECREE

FILED
SEP 8 1954
ALICE J. DICK, Register

STATE OF ALABAMA)
BALDWIN COUNTY)

GRACE LOUISE PLEMONS,
Complainant
vs.
RUDIE C. PLEMONS,
Respondent

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

Comes the Respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause, waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And the answer to the bill of complaint heretofore filed in this cause, respondent says:

1. He ^{Denies} admits the allegations contained in the said bill of complaint.

Charles E. Plemons
Witness

Rudie
R C Plemons
Respondent

Nell Plemons
Witness

FILED

9-3-54

ALICE J. DUCK, Register

NO 3344

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

GRACE LOUISE PLEMONS
Complainant

vs.

RUDIE C. PLEMONS
Respondent

Respondent's

Answer and Waiver

FILED

SEP 3. 1954

ALICE J. DUCK, Registered

STATE OF ALABAMA)	Ø	
BALDWIN COUNTY)	Ø	
	Ø	
GRACE LOUISE PLEMONS,	Ø	IN THE CIRCUIT COURT OF
Complainant		
vs.	Ø	BALDWIN COUNTY, ALABAMA
RUDIE C. PLEMONS,	Ø	IN EQUITY
Respondent		

To the Honorable Judges of the Circuit Court of Baldwin County,
Sitting in Equity:

Your complainant, GRACE LOUISE PLEMONS, respectfully represents and shows unto your Honors:

1. That complainant is over the age of twenty-one years and is a resident of said County and State, and has been a bona fide resident of said State for more than one year next preceding the filing of this bill of complaint; that RUDIE C. PLEMONS is over the age of twenty-one years and resides in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married on or about, to-wit, April 9, 1930, at Decatur, Alabama.

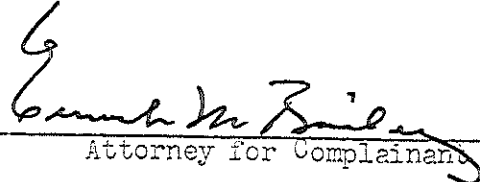
3. Your complainant avers and charges that the said respondent did on or about the 28th day of August, 1954, and many times prior thereto did assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

4. Complainant further avers that the complainant and respondent have three minor children which are living and have been living with the complainant since August 28th, 1954 and that the complainant and respondent have entered into an agreement as to the custody, control and support of said minor children, a copy of which agreement is attached hereto as Exhibit A and made a part hereof, and by the terms of said agreement the complainant is given the care, control, and custody of said minor children.

Complainant further avers that under the circumstances, this is a reasonable, just and proper agreement and prays the court that in the event a decree of divorce is given in this cause, that the Court will decree that the

parties keep and abide by the terms of said agreement.

The premises considered, your complainant makes the said RUDIE C. PLEMONS a party respondent to this bill of complaint, and in order that complainant may have the relief prayed herein for, may it please your Honors to cause the State's writ of subpoena to be issued, directed to the said RUDIE C. PLEMONS, commanding him to answer, plead or demur to this bill of complaint, within the time required by law; and that on a final hearing of this cause, that your Honors will enter a decree divorcing your complainant from said respondent, granting the complainant the right to remarry; that you will decree that the complainant and respondent keep and abide by the agreement hereto attached and marked Exhibit A, and that your Honors will grant such other, further, or different relief as unto your Honors may seem just and proper, and your complainant will ever pray.


Attorney for Complainant

STATE OF ALABAMA)
BALDWIN COUNTY)

This agreement made and entered into on this the 30th day of August, 1954, by and between GRACE LOUISE PLEMONS hereinafter referred to as the party of the first part, and RUDIE C. PLEMONS, hereinafter referred to as the party of the second part:

WITNESSETH:

Whereas, the parties hereto have been husband and wife for a period of twenty-four years, and as a result of such union have three (3) children, as follows:

R. B. aged eleven years.
CARLENE aged fourteen years.
GALE aged seven years.

And whereas, said parties have definitely concluded that under conditions now existing it is impracticable for them to live together as man and wife.

Now, therefore, in consideration thereof, and of the mutual agreements hereinafter made, they have mutually agreed to a complete separation under the following express terms and conditions:

1. The said parties shall entirely and completely separate as man and wife, live separate and apart, and neither party hereafter shall in any way harass, threaten, intimidate, or otherwise act in any way so as to embarrass or humiliate the other party.
2. The party of the first part shall have the custody, control and support of the children aforesaid. It is understood and agreed, however, although the children are in the custody, control and support of the party of the first part, the other party shall have the right at convenient times of access and visitation of the children, such access and visitation to be exercised in a proper and reasonable manner and at such times as may be convenient to and consented to by the party of the first part and provided further that visitation will be allowed only when party of the second part is not under the influence of alcohol in any form.

It is further agreed between the parties that should a divorce proceeding at any time hereafter be instituted that the terms of this agreement may be entered as a part of any decree entered therein should the parties hereto so desire and should the same be deemed necessary by the Court in said cause and for that purpose the proposed decree before it is submitted to the Court shall be submitted to counsel for each party hereto for examination and alterations if

necessary so as to properly incorporate the terms of this agreement as set forth herein before the same is submitted to the court for final approval and signature.

It is further understood and agreed that under such conditions, the Court thereafter shall reserve and maintain its right in the interest of the welfare of the children to make such changes in reference to the custody, control and support of the children as the Court may determine, after proper hearing with due notice, is in the best interests of the children.

This agreement has been made and executed by the parties hereto on the day and date hereinabove first set forth, in good faith, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.

Grace Louise Plemons
Grace Louise Plemons, Complainant

Rudie C. Plemons
Rudie C. Plemons, Respondent

Charles E. Plemons
Witness for Mr. Plemons

Nell Plemons
Witness for Mr. Plemons

E. M. Bailey
Witness for Mrs. Plemons

Witness for Mrs. Plemons

FILED

9-3-54

ALICE L. DICK, Register

703344

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

GRACE LOUISE PLEMONS
Complainant

vs.

RUDIE C. PLEMONS
Respondent

BILL OF COMPLAINT
and
EXHIBIT A

FILED

SEP 3. 1954

AUGUST A. DUCK, Register

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

GRACE LOUISE PLEMONS

Complainant

VS.

RUDIE C. PLEMONS

Respondent

I, Shirley Copas

as ~~Register and~~ Commissioner

have called and caused to come before me Grace Louise Plemons and Cecil Smith

witnesses named in the Requirement for Oral Examination, on the 1st day of September

1954, at the office of E. M. Bailey

in Fairhope

, Alabama, and having first sworn said Witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Grace Louise Plemons and

Cecil Smith

doth depose and say as follows:

My name is Grace Louise Plemons and the Respondent's name is Rudie C. Plemons. We are both over the age of twenty-one years and bona fide residents of Baldwin County, Alabama, and have been for more than one year next preceding the filing of the bill of complaint. The Respondent and I were married at Decatur, Alabama on April 9, 1930, and lived together as husband and wife until August 28, 1954.

On August 28, 1954, the Respondent cursed, abused and did commit actual violence upon my person which I believe did endanger my life and health. The Respondent has on numerous occasions abused and done actual violence and on at least one occasion struck me into unconsciousness. On that occasion he refused to carry me to the hospital and my children did so over his objections. I am afraid that if we live together as husband and wife, the Respondent will do violence such as will injure me permanently or cause my death.

Grace Louise Plemons
Grace Louise Plemons

My name is Cecil Smith. I am over the age of twenty-one and am a resident of Baldwin County. On the night of 28 August I was visiting the home of the Complainant and Respondent. The Complainant had gone to bed and the Respondent was drinking. I was sitting in the front yard when the complainant ran out followed by the respondent. The respondent was cursing and hitting the complainant. He was hitting her on the head and at the same time holding a knife in his hand. He struck her several times and threw her to the ground. He was striking at the Complainant and hit his daughter. The police arrived and the Respondent intentionally concealed the knife with which he had been threatening the Complainant. There were obvious bruises on the body of the complainant which I testify were put there by the Respondent.

Cecil Smith
Cecil Smith

ORAL EXAMINATION

I, SHIRLEY COPAS, as Register and Commissioner hereby certify that the foregoing depositions 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 Ernest M. Bailey 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 1st day of September, 1954

Shirley Copas (L. S.)

No. _____	Page _____
The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
GRACE LOUISE PLEMONS	Complainant
vs.	
RUDIE C. PLEMONS	Respondent
Oral Deposition	
Filed _____, 19____	Register
FILED	Record
SEP 3, 1954	
ALICE L. GREGG, Register	
Vol. _____	Page _____
Register	

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: SHIRLEY COPAS
FAIRHOPE, ALABAMA

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 Grace Louise Plemons and Cecil Smith

as witnesses in behalf of Grace Louise Plemons in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Grace Louise Plemons

Grace Louise Plemons, Complainant
and

Rudie C. Plemons Respondent

on oath, to be by you administered, upon Grace Louise Plemons and Cecil Smith
to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 30th day of August, 1941.

Alfred J. Duke
Register.

Commissioner's Fee, \$

Witness' Fees, \$

Grace Louise Plemons

vs.

Rudie C. Plemons

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, _____
 Testimony of Grace Louise Plemons and Cecil Smith

and in behalf of Defendant upon _____ Answer and waiver

E. M. Bailey
 Attorney for Complaint

Archie J. Bennett
 Register.

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

GRACE LOUISE PLEMONS

vs.

RUDIE C. PLEMONS

NOTE OF TESTIMONY

Filed in Open Court this

2nd

day of

Sept

, 1944

Dee J. R. R. R.
Register.

Printed by the Baldwin Times

3344