

Edna Louise Kring
Complainant

Vs

Elbert B. Kring
Respondent

In the Circuit Court

Baldwin County

Alabama

IN EQUITY

To the Honorable F. W. Hare, Judge of said Court, sitting in Equity:

Comes Your Complainant, Edna Louise Kring, and respectfully exhibits this, her Bill of Complaint against Elbert B. Kring, and shows unto Your Honor as follows:

First: Complainant and Respondent, both of whom are past the age of Twenty One Years, intermarried on May 19th 1939 at Birmingham Port, Alabama.

Second: Both parties hereto have remained residents of the State of Alabama ever since said marriage, Complainant residing at present in Baldwin County, and both parties hereto resided in said Baldwin County when the acts complained of herein took place.

Third: On or before June 10th 1945, Respondent voluntarily abandoned Complainant and has, ever since, continued said abandonment with total neglect of the marital covenant on his part to be performed.

The premises considered, Complainant prays that Your Honor grant all appropriate and legal process and that same be directed to the said Elbert B. Kring demanding him to personally appear before this Honorable Court within the time required by law and to then and there answer fully and completely the several paragraphs of this Bill of Complaint and that he be required to abide and obey all orders and decrees of this Court which to Your Honor may seem meet and proper.

Complainant further prays, upon hearing of this cause, that a decree be rendered forever divorcing her from said Elbert B. Kring, granting her the right to the resumption of her maiden name, Edna Louise Woods, granting her the right to remarry should she so desire and granting her such other, different and further relief as may be or appear proper in the premises.

Edna Louise Kring
Complainant

E. P. Cramer
Solicitor for Complainant.

Edna Louise Kring
Complainant

vs

Elbert B. Kring
Respondent

In the Circuit Court

Baldwin County

Alabama

IN EQUITY

To the Honorable F. W. Hare, Judge of said Court, sitting in Equity:

Comes Your Complainant, Edna Louise Kring, and respectfully exhibits this, her Bill of Complaint against Elbert B. Kring, and shows unto Your Honor as follows:

First: Complainant and Respondent, both of whom are past the age of Twenty One Years, intermarried on May 19th 1938 at Birmingham Port, Alabama.

Second: Both parties hereto have remained residents of the State of Alabama ever since said marriage, Complainant residing at present in Baldwin County, and both parties hereto resided in said Baldwin County when the acts complained of herein took place.

Third: On or before June 10th 1943, Respondent Voluntarily abandoned Complainant and has, ever since, continued said abandonment with total neglect of the marital covenant on his part to be performed.

The premises considered, Complainant prays that Your Honor grant all appropriate and legal process and that same be directed to the said Elbert B. Kring demanding him to personally appear before this Honorable Court within the time required by law and to then and there answer fully and completely the several paragraphs of this Bill of Complaint and that he be required to abide and obey all orders and decrees of this Court which to Your Honor may seem meet and proper.

Complainant further prays, upon hearing of this cause, that a decree be rendered forever divorcing her from said Elbert B. Kring, granting her the right to the resumption of her maiden name, Edna Louise Woods, granting her the right to remarry should she so desire and granting her such other, different and further relief as may be or appear proper in the premises.

Edna Louise Kring
Complainant

E. A. France
Solicitor for Complainant.

Miss Louise Ewing
Complainant

vs

Herbert B. Ewing
Respondent

In the Circuit Court

Baldwin County

Alabama

IN EQUITY

To the Honorable P. V. Hare, Judge of said Court, sitting in Equity:

Comes Your Complainant, Miss Louise Ewing, and respectfully exhibits this, her Bill of Complaint against Herbert B. Ewing, and shows unto Your Honor as follows:

First: Complainant and Respondent, both of whom are past the age of Twenty One Years, intermarried on May 19th 1928 at Birmingham Park, Alabama.

Second: Both parties hereto have remained residents of the State of Alabama ever since said marriage, Complainant residing at present in Baldwin County, and both parties hereto resided in said Baldwin County when the acts complained of herein took place.

Third: On or before June 10th 1945, Respondent voluntarily abandoned Complainant and has, ever since, continued said abandonment with total neglect of the marital covenant on his part to be performed.

The premises considered, Complainant prays that Your Honor grant all appropriate and legal remedies and that same be directed to the said Herbert B. Ewing commanding him to personally appear before this Honorable Court within the time required by law and to then and there answer fully and completely the several paragraphs of this Bill of Complaint and that he be required to abide and obey all orders and decrees of this Court which to Your Honor may seem meet and proper.

Complainant further prays, upon hearing of this cause, that a decree be rendered forever divorcing her from said Herbert B. Ewing, granting her the right to the resumption of her maiden name, Miss Louise Woods, granting her the right to remarry should she so desire and granting her such other, different and further relief as may be or appear proper in the premises.

Edna Louise Ewing
Complainant

Solicitor for Complainant.

Explant

RECORDED

King

B

King

June 22 1944

Robert
C. King

1141

RECORDED
King

Q

Kenny

Answered 9 Nov

July 25 1944
B. J. King
B. J. King

7

1

THE STATE OF ALABAMA }
Baldwin County }

Circuit Court of Baldwin County, Alabama.
(In Equity)

Edna Louise Kring _____ COMPLAINANT

vs.

Elbert B. Kring _____ RESPONDENT

I, Frances G. Crawford _____

as Register and Commissioner _____

have called and caused to come before me Edna Louise Kring and Carrie Mae Cobb _____

witnesses named in the requirement for Oral Examination, on the 24th day of June _____

1944, at the office of E. A. Cramer, Attorney at Law, _____

in Fairhope _____, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Edna Louise Kring _____

doth depose and say as follows:

Elbert B. Kring and I were married on May 19th 1938 at Birmingham Port, Alabama. I am 25 years of age and he is 31. We have lived in Alabama continuously since our marriage. I have been living in Baldwin County for about 2 years. We lived together in Baldwin County up to June 10th 1943 when Elbert left me. I knew that he had been interested in another woman but could not influence him to stay away from her. He has never made any attempt to return to me since that date nor has he ever given me anything in the way of support. My maiden name was Edna Louise Woods and, if I am given a divorce, I would like to have the right to resume the use of my maiden name.

Edna Louise Kring

And the said Carrie Mae Cobb doth depose and say as follows:

I am the sister in law of Edna Louise Kring. She has been living with me for some months in Fairhope, Alabama. I know that Elbert left her more than a year ago and that she has worked and supported herself ever since without any help from him. I also know that he has not lived with her since early June, 1943.

Carrie Mae Cobb

And said Edna Louise Kring doth say further:

I have examined the answer and waiver in my case against my husband and I know that the signature "Elbert B. Kring" is in my husband's handwriting.

Edna Louise Kring

I, FRANCES G. CRAWFORD as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness ~~lx~~ and read over to ~~them~~ and ~~they~~ signed the same in the presence of myself and _____

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ~~lx~~ or had proof made before me of the identity of said witness ~~lx~~; 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 24th day of June 1944
Frances G. Crawford (L. S.)

No. 1140 Page _____
THE STATE OF ALABAMA,
 BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

King
 COMPLAINANT

King
 VS.
 RESPONDENT

ORAL DEPOSITION

Filed June 24, 1944
Frances G. Crawford
 Register.

RECORDED IN _____

Record _____

Vol. _____ Page _____

Register _____

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. 1140.

CIRCUIT COURT BALDWIN COUNTY

June

TERM, 1944

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Elbert E. Kring.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Elbert B Kring.

Respondent.

Defendant

by Edna Louise Kring.

Complainant.

Witness my hand this 22nd day of June, 1944

R. D. ...
Clerk

No. 1140 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Edna Louise Kring,

Plaintiffs

vs.

Elbert B. Kring,

Defendants

SUMMONS AND COMPLAINT

Filed June, 22nd 1944

R. S. Duck Register

Elbert B. Kring
NOT FOUND in Jefferson County this

the 24 day of June 1944

HOLT A. McDOWELL, Sheriff,
Jefferson Co., Ala.

By O. Hogan D.S.

Not Served in
Fairfield By Postman
E. A. Crater.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

401 Valley Road,

RECEIVED IN OFFICE
Fairfield Ala.

194

Sheriff

I have executed this summons

this _____ 194
by leaving a copy with

Sheriff

Deputy Sheriff

Edna Louise Kring.

VS.

Elbert B Kring.

THE STATE OF ALABAMA,
BALDWIN COUNTY.

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
and ^W testimony of Complainants ^W witnesses.

and in behalf of Defendant upon Answer and Waiver.

B. D. [Signature] Register.

RECORDED

No. 1140.

The State of Alabama,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

~~Edna Louise~~ Kring.

VS.

Elbert B Kring.

NOTE OF TESTIMONY

Filed in Open Court this 26th

day of June. 194 4

Reduch

Register.

Bay Minette, Ala., 6/22 1944

To the Sheriff of Jefferson County,
Birmingham, Alabama.

I enclose herewith Summons & Complaint
to be served on Elbert B King
401 Vally Road, Fairfield Ala

Please serve and return as early as possible.

W R Stewart
Sheriff, Baldwin County, Alabama

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, {

No. 1140.

BALDWIN COUNTY

CIRCUIT COURT BALDWIN COUNTY

June.

TERM, 1944

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Elbert B. Kring.

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

Elbert B Kring.

Respondant.

by Edna Louise Kring.

Complainant.

Witness my hand this 22nd day of June, 1944

R. Duck Per
Clerk.

No. 1140. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

Edna Louise Kring.

Plaintiffs

vs.

Elbert B. Kring.

Defendants

SUMMONS AND COMPLAINT

Filed June 22nd 1944

R. S. Duck. Register.

401 V Road

E A Cramer.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

401 Valley Road.

RECEIVED IN OFFICE
Fairfield Ala.

194

Sheriff

I have executed this summons,

this 194

by leaving a copy with

21 JUN 22 1944
CLERK'S OFFICE
BALDWIN COUNTY ALA.

Sheriff

Deputy Sheriff