

(3568)

DIVORCE DECREE

PRINTED BY MOORE PTG CO.

The State of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

-----ISAIAH MOSLEY-----, Complainant
vs.
-----GLADYS MOSLEY-----, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on ----- 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 -----Isaiah Mosley----- is forever divorced from the said -----Gladys Mosley----- for and on account of -----voluntary abandonment-----

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 payment of the cost of this suit.

It is further ordered that -----Isaiah Mosley----- the -----complainant----- pay the cost herein to be taxed, for which executed may issue.

This 15th day of July, 1955
Hubert M. Hall
Judge Circuit Court, In Equity.

I, Alice J. Duck -----, 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. 3568 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

JUL 16 1955

ALICE J. DYCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Marie B. Bryars

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 Isaiah Mosley and Loretta Watson

as witnesses in behalf of Isaiah Mosley in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Isaiah Mosley

_____, Complainant
and Gladys Mosley

_____, Respondent

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

Witness 12 day of July, 1955

Becky J. Burk

Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 3568

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

ISAIAH MOSLEY

Complainant—

vs.

GLADYS MOSLEY

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

MARIE B. BRYARS

WITNESSES:

ISAIAH MOSLEY

LORETTA WATSON

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)ISAIAH MOSLEY

Complainant

VS.

GLADYS MOSLEY

Respondent

I, Marie B. Bryars

as Register and Commissioner

have called and caused to come before me Isaiah Mosley and Loretta Watson

witness S named in the Requirement for Oral Examination, on the 13 day of July 195 5, at the office of Beebe & Swearingen in Bay Minette, Alabama, and having first sworn said Witness s to speak the truth, the whole truth, and nothing but the truth, the said Isaiah Mosley and Loretta Watson doth depose and say as follows:

Isaiah Mosley testified as follows:

My name is Isaiah Mosley. I am over the age of twenty-one years and a resident of Baldwin County, Alabama, where I have resided continuously for more than ten years next preceding this date. I am the complainant in that suit for divorce in the Circuit Court of Baldwin County, Alabama, in Equity against Gladys Mosley. She is over the age of twenty-one years and is a resident of Baldwin County, Alabama, where she has resided for more than ten years next preceding this date. We were married January 2, 1942, at Loxley in Baldwin County, Alabama and have lived here continuously since. On June 25, 1954, without just cause or reasonable excuse, she voluntarily abandoned me at Fairhope and she has voluntarily remained away from me from said date. We have not lived together as husband and wife since June 25, 1954.

Isaiah Mosley

Loretta Watson, being duly sworn, testified as follows:

My name is Loretta Watson. I am the sister of Isaiah Mosley. I am over the age of twenty-one years and am a resident of Baldwin County, Alabama. I have known Isaiah and Gladys Mosley continuously since their marriage. She voluntarily abandoned him June 25, 1954, without just cause or reasonable excuse and they have not lived together since said date.

Loretta Watson

ORAL EXAMINATION.

I, Marie B. Bryars, as Register and Commissioner hereby certify that the foregoing deposition Son Oral Examination was taken down by me in writing in the words of the witnesses and read over to them and they signed the same in the presence of myself Marie B. Bryars

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proom made before me of the identity of said witnesses; that I am not of counsel or 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 13 day of July, 1955.

Marie B. Bryars (L. S.)

NO. 3568 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

TSALAH MOSLEY

vs. Complainant

GLADYS MOSLEY

Respondent.

Oral Deposition

Filed FILLED, 195

JUL 13 1955, Register.

ALICE J. HARRIS, Register

Record

Vol. _____ Page _____

Register

ISAIAH MOSLEY,
COMPLAINANT

VS

GLADYS MOSLEY,
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

Comes Gladys Mosley, defendant in the above styled cause and answering complainant's complaint and every allegation therein made says the same are untrue, and she demands strict proof thereof.

Defendant waives notice of the application to take testimony, notice of the time and place of taking testimony, the right to cross examine complainant's witnesses, and notice of the submission of the cause for final decree, and agrees and consents that the said cause be submitted for final decree upon motion of complainant or his solicitor of record.

WITNESS my hand this the 13 day of July, 1955.

Gladys Mosley
Defendant

STATE OF ALABAMA

BALDWIN COUNTY

I, J. C. Lee, a Notary Public in and for said State and County, hereby certify that Gladys Mosley 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, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 13 day of July, 1955.

J. C. Lee
Notary Public, Baldwin Co., Alabama

ISAIAH MOSLEY

Complainant

vs.

GLADYS MOSLEY

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

No.

DEMAND FOR ORAL EXAMINATION

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from Bay

Minette, in the County of Baldwin

Alabama, the place of trial of said cause, to-wit:

Isaiah Mosley and Loretta Watson

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

Solicitor for Complainant

NOTE:

Complainant suggests the name of Marie B. Bryars

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

By [Signature]
Solicitor for Complainant.

3568

DEMAND FOR ORAL EXAMINATION

ISAIAH MOSLEY

Complainant

vs.

GLADYS MOSLEY

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed this

day of

1955

194---

FILED
JUL 15 1955
ALICE J. DECK, Register

Register

Moore Printing Co.

8550 REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____

Term, 194_____

ISAIAH MOSLEY

, Complainant_____

Vs.

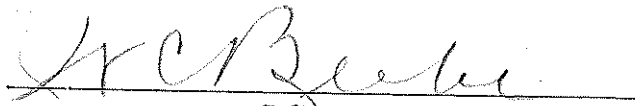
GLADYS MOSLEY

, Defendant_____

To Alice J. Duck, Register

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by BEEBE & SWEARINGEN

_____ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.


Solicitor for Complainant.

No. 3568

Page _____

The State of Alabama,

Baldwin County

CIRCUIT COURT, IN EQUITY

ISAIAH MOSLEY

Vs.

GLADYS MOSLEY

**REQUEST FOR DECREE IN
VACATION**

Filed _____, 194

FILED

Register.

JUL 13 1955

ALICE J. DWCK, Register

Recorded in _____ Record

Vol. _____ Page _____

Register.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon, Gladys Mosley, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction, within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a bill of complaint lately exhibited by Isaiah Mosley against the said Gladys Mosley and further to do and perform what said Judge shall order and direct in that behalf, and this the Defendant shall in no wise omit under penalty of the law; and we further command that you return this writ with your endorsement thereof, to our said court immediately upon the execution thereof.

WITNESS, Alice J. Duck, Register of said Circuit Court, this the _____ day of _____, 19____.

Register

ISAIAH MOSLEY

COMPLAINANT

VS

GLADYS MOSLEY

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

And now comes your complainant, Isaiah Mosley, and humbly complaining against Gladys Mosley, defendant, respectfully shows unto your Honor:

First: That your complainant and the said Gladys Mosley, are each over the age of twenty-one years and are residents of Baldwin County, Alabama, where they resided at the time of their marriage and have resided continuously since.

Second: That your complainant and the said Gladys Mosley, are husband and wife, having intermarried at Loxley, Alabama, January 2, 1942, and they lived together as husband and wife until June 25, 1954, when the said Gladys Mosley voluntarily abandoned this complainant without just cause and reasonable excuse; that the said Gladys

Mosley and this complainant have not lived together for more than twelve months next preceding the filing of this bill of complaint;

WHEREFORE your complainant prays that this Honorable Court will take the jurisdiction of the cause made by this bill of complaint and make the said Gladys Mosley party defendant hereto and by appropriate process require her to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this complainant and the said defendant and complainant prays for such other, further or different relief as in equity and good conscience he shall be entitled to receive in the premises.

BEEBE & SWEARINGEN

By

J. V. C. Beebe
Solicitors for Complainant

Isaiah Moseley

Gladys Moseley

vs.

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 of Defendant and Deposition
of Isaiah Moseley and Loretta Watson
and Motion for judgment

and in behalf of Defendant upon _____

Answer

Beebe & Weaver
Beck French Register.

No. 3568

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

vs.

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

FILED

JUL 13 1955

Register.

Printed by the Baldwin Times

ALICE J. DECK, Register