

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

PRUE P. APPLEQUIST

Complainant

vs.

OREN V. APPLEQUIST

Respondent

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

PRUE P. APPLEQUIST

is forever divorced from the

said OREN V. APPLEQUIST for and on account of

Cruelty. The Court after considering the written agreement entered into between

the Complainant and the Respondent touching upon the personal property of the

parties, the custody of the minor children and the support of the minor children,

it is further ordered, adjudged and decreed by the Court that the written agree-

ment is hereby ratified and approved and the agreement is by reference made a

part hereof.

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 Prue P. Applequist the Complainant pay the cost herein to be taxed, for which executed may issue.

This 25 day of July, 1955

J. Hubert M. Hall
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. 3577 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

FRUE P. APPLEQUIST

Complainant

vs.

OREN V. APPLEQUIST

Respondent

DIVORCE DECREE

FILED
JUL 12 1955

CLERK OF COURT, BALDWIN COUNTY

PRUE P. APPLEQUIST

vs.

OREN V. APPLEQUIST

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, _____

AND TESTIMONY OF PRUE P. APPLEQUIST and OREN DAVID APPLEQUIST

and in behalf of Defendant upon ANSWER AND WAIVER

General W. Bailey
Attorney at Law

W. J. ...
Register.

No. 3577

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

PRUE P. APPLEQUIST

vs.

OREN V. APPLEQUIST

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

FILED

JUL 25 1955

Register.

Printed by the Baldwin County

ALICE J. ROCK Register

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

PRUE P. APPLEQUIST

Complainant

VS.

OREN V. APPLEQUIST

Respondent

I, Shirley Copas

as ~~Notary Public~~ Commissioner

have called and caused to come before me Prue P. Applequist and Oren David Applequist

witnesses named in the Requirement for Oral Examination, on the 23rd day of July
1955, at the office of Ernest M. Bailey
in Fairhope, Alabama, and having first sworn said Witness^{es} to speak the
truth, the whole truth, and nothing but the truth, the said Prue P. Applequist and Oren

David Applequist doth depose and say as follows:

for more than one year last preceding the filing of this complaint
My name is Prue P. Applequist and the Respondent's name is Oren V. Applequist. I
am a bona fide resident of Baldwin County, Alabama. The Respondent and I were married
at Bristolville, Ohio on November 20, 1940 and lived together as husband and wife until
August 31, 1954.
On or about, to-wit, August 31, 1954 the Respondent committed acts of violence on my
person in that he threw dishes at me. He has frequently committed acts of violence
to my person. The Respondent has a violent temper and has on occasions committed acts
which have endangered my life and health. On one occasion he turned on the gas in the
house with the view of causing me physical harm. The Respondent has on many occasions
given me reason to believe that he would endanger my life if I continued to live with
him as his wife, or that he would injure me permanently.

Prue P. Applequist
Prue P. Applequist

My name is Oren David Applequist. I am thirteen years of age and am the son of
Prue P. Applequist and Oren V. Applequist. I was present on or about August 31,
1954 when my father threw dishes at my mother.

Oren David Applequist
Oren David Applequist

ORAL EXAMINATION

I, Shirley Copas, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition 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, Attorney at Law

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 23rd day of July, 1955
Shirley Copas (L. S.)

No. 3577 Page _____

The State of Alabama
Baldwin County.

In Circuit Court, In Equity

PRUE P. APPELOUT SP

vs. Complainant

OREN V. APPELOUT SP

Respondent

Oral Deposition

Filed _____, 19____

FILED

JUL 25 1955

Recorded in

ALICE L. OWEN, Register

Record

Vol. _____

Page _____

Register

PRUE P. APPLEQUIST,
Complainant

vs.

OREN V. APPLEQUIST,
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

STIPULATION

It is stipulated and agreed by and between the parties hereto as a property division in lieu of alimony that Prue P. Applequist has this day transferred to Oren V. Applequist all her interest in and to their home which is now located at No. 6, Fourth Street, Lilydale, New York; that Oren V. Applequist has this transferred to Prue P. Applequist all in his interest in any personal property now in the possession of the said Prue P. Applequist; that the parties have also agreed between themselves as follows:

That Prue P. Applequist should have the care, custody and control of the children named in the Complaint, with the right of the Respondent, Oren V. Applequist to visit them at reasonable and proper times. That the Respondent, Oren V. Applequist, may, if the children consent, have custody and control of the said children for a period of Six (6) weeks during the summer months. Provided that the said Respondent shall assure the Complainant that he has a proper and suitable place in which the said children shall reside.

That the Respondent, Oren V. Applequist, should pay the Complainant, Prue P. Applequist, the sum of Twenty-five (\$25.00) Dollars a week, beginning at the date of these presents, except during that period when the said children are in his care and custody. That should the Complainant have, for the children, serious medical expenses in the future, the Respondent agrees to pay the amount of such expenses.

Dated this 11th day of July, 1955.

Prue P. Applequist
Prue P. Applequist

Oren V. Applequist
Oren V. Applequist

WITNESSES FOR COMPLAINANT:

Helen M. Bailey
James M. Bailey

WITNESSES FOR RESPONDENT:

Carl C. Darling X Defendant's Friend

3577

STIPULATION

PRIME P. APPLEQUIST,
Complainant

VS.

OREN V. APPLEQUIST,
Respondent

FILED
JUL 25 1955

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Shirley Copas

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 Prue P. Applequist and Oren David Applequist

as witnesses in behalf of Prue P. Applequist in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

Prue P. Applequist, Complainant
and Oren V. Applequist

Respondent

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

Witness 21st day of July, 1955

David L. Duck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3577

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Prue P. Applequist

Complainant

VS.

Oren V. Applequist

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

FILED

JUL 25 1955
WITNESSES:

AUGIE J. BUCK, Clerk

Oren David Applequist

PRUE P. APPLEQUIST,
Complainant

VS.

OREN V. APPLEQUIST,
Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

ANSWER AND WAIVER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof, says:

1. Respondent admits the allegations of the First Paragraph of the Bill of Complaint.
2. Respondent admits the allegations of the Second Paragraph of the Bill of Complaint as to the date of marriage and date of separation, but Respondent denies all other allegations of this paragraph and demands strict proof thereof.
3. Respondent admits the allegations of the Third Paragraph of the Bill of Complaint.

Respondent hereby accepts service of a copy of the Summons and Complaint in this cause and waives further service of same. Respondent also waives notice of taking of testimony in this cause and notice of submission of said cause and agrees that the testimony may be taken and the cause submitted without further notice to him.

Oren V. Applequist
Oren V. Applequist
Respondent

STATE OF NEW YORK }
COUNTY OF Chautauque

I, the undersigned notary public in and for said state and county, hereby certify that Oren V. Applequist, 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 bears date.

Given under my hand and notarial seal this 11th day of July, 1955.

My commission expires

March 31, 1956

Carl C. Carling
Notary Public

RECORDED

3577

ANSWER AND WAIVER

PRUE P. APPLEQUIST,
Complainant

vs.

OREN V. APPLEQUIST,
Respondent

FILED

JUL 25 1955

ALICE L. JONES, Register

STATE OF ALABAMA)
)
 BALDWIN COUNTY)

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon OREN V. APPLEQUIST 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 PRUE P. APPLEQUIST, as complainant, against OREN V. APPLEQUIST, as respondent.

Witness my hand this _____ day of _____, 1955.

 Register.

PRUE P. APPLEQUIST,	Q	
Complainant,	Q	IN THE CIRCUIT COURT OF
VS.	Q	BALDWIN COUNTY, ALABAMA
OREN V. APPLEQUIST,	Q	IN EQUITY
Respondent.	Q	

Comes your Complainant, Prue P. Applequist, and files this her Bill of Complaint for divorce against Oren V. Applequist, and shows unto your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years, and that your Complainant is a resident citizen of Baldwin County, Alabama, residing at Fairhope, and the Respondent is a resident of the state of New York. *for more than one year next preceding the filing of this complaint*

SECOND:

That your Complainant and the Respondent were married on heretofore, to-wit, Nov. 20, 1940 at Bristolville, Ohio, and lived together as man and wife until on, to-wit, August 31, 1954, when, on account of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that in August, 1954 and at times prior thereto, the Complainant states that the Respondent committed acts of violence on her person, attended with danger to her health and life; Complainant avers and charges that Respondent has made numerous

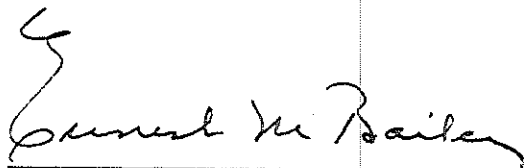
threats of doing her physical harm and from his manner and conduct towards her, she is reasonably certain that he will commit such violence on her person, attended with danger to her life and health.

THIRD:

That there were born of this marriage between your Complainant and the Respondent the following named children, viz; Oren David Applequist, thirteen years of age, and Juanita Joan Applequist, eleven years of age. That your Complainant is a fit and proper person to have the care, custody and control of such children. That your Complainant has no money or property with which to properly support and educate such children and the Respondent is able to pay your Complainant such sufficient amounts to properly support and educate such children.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Oren V. Applequist be made a party Defendant to this cause by the usual writ or process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that your Honor will award your Complainant custody and control of her minor children herein named and will order and decree that your Honor shall pay your Complainant the sum of Twenty-five (\$25.00) Dollars a week as support for such children, except during the period when the children are in his custody and care. That your Honor will also grant unto your Complainant an absolute divorce from said Respondent and will decree that the parties be allowed to remarry if they see fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

RECORDED

703677

BILL OF COMPLAINT

PRUE P. APPLEQUIST,
Complainant

vs.

OREN V. APPLEQUIST,
Respondent

FILED

JUL 25 1955

ALICE L. DUCK, REGISTRAR