# The State of Alabama, Baldwin County

#### CIRCUIT COURT, IN EQUITY

EDITH FORTE RADA , Complainant

vs.	
James J. Rada. UK.	, Respondent
This cause coming on to be heard was submitted upon Bill of C	Complaint, Decree Pro Confesso XonX
Answer and waiver of defendant and Testimony as note sideration thereof, the Court is of the opinion that the Complainant is estaid bill.	
It is therefore ordered, adjudged and decreed by the Court that existing between the Complainant and Defendant be, and the same are be	
Edith Forte Rada	is forever divorced from the
said_Amnes_J.i_Rade, Jr.	for and on account of
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to each other until sixty days after the rendition of this decree, and that days, neither party shall again marry except to each other during the p  It is further ordered that the Complainant and Respondent be, again contract marriage upon payment of the cost of this suit.  It is further ordered that Edith Forte Rada	endency of said appeal.  and they are hereby permitted to
the <u>Complainant</u> pay the cost herein to be ta	xed, for which executed may issue.
Thisday of	., 19
	Judge Circuit Court, in Equity.
foregoing is a correct copy of the Judge of the Circuit Court in the decree is on file and enrolled in Witness my hand and seal of	Register of the Circuit bama, do hereby certify that the he original decree rendered by the ne above stated cause, which said my office.  this theday
Reg	rister of Circuit Court, In Equity.

# The State of Alabama, Baldwin County

### CIRCUIT COURT, IN EQUITY

ED	ITH FORTE RADA	, Complainant	
	vs.		
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sideration thereof, the	e Court is of the opinion that the Co	mplainant is entitled to the relief praye	d for in
It is therefore	ordered, adjudged and decreed by th	e Court that the bonds of matrimony h	eretofor
existing between the	Complainant and Defendant be, and t	he same are hereby dissolved, and that	the said
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		Judge Circuit Court, In	Equity.
I,		, Register of the	Circuit
		ounty, Alabama, do hereby certify th	
		et copy of the original decree rendered be Court in the above stated cause, which	
r .	decree is on file and	enrolled in my office.	2
:	Witness my ha	nd and seal this the	day
	of	, 19	
$v_{i,j}$			
		Register of Circuit Court, In Ec	quity.
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### The State of Alabama, Baldwin County

### CIRCUIT COURT, IN EQUITY

	ITH FULLE RADA	, Complainant
	. <b>vs.</b>	
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This cause o	oming on to be heard was submitted upo	on Bill of Complaint, Decree 1776 Confessor &
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		plainant is entitled to the relief prayed for in
It is therefore	ordered, adjudged and decreed by the	Court that the bonds of matrimony heretofore
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<u>1785th</u>	<u> Fo:</u>	rto Ba	20	Complainant	
Vs.					
James	<u>،</u> ل	Rada,	Jr.		
/		,		Respondent	

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

No.	

### DEMAND FOR ORAL EXAMINATION

*		
1. That the following n		to the Court as follows: one hundred miles from <u>Bay Minet</u>
-	n the County ofBaldw	in
Alabama, the place of trial of sa	uid cause, to-wit : Edith_Fo	rte Rada and Lonnie Forte
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2.4		
arr	:	
2. That said Complainan	trequires an oral examination of	of said witnesses before a Commissioner
appointed by the Register of thi		k Swearingen
	ру	Colinia Colonia
		Solicitor for Complainant
NOTE:		
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s a suitable and competent pers		the examination of said witnesses.  Swearings
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DEMAND FOR ORAL EXAMINATION

Edich Forte Rada

Complainant

Januer J. Rada D. J. Respondent

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

IN EQUITY

AUG 12 1955

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ALICE J. DUCK, Register

Moore Printing Co.

# THE STATE OF ALABAMA, Baldwin County.

### CIRCUIT COURT

To: Madeline S. Bryan	<u> </u>		**
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KNOW YE: that we, ha	ving full faith in your pruder	nce and competency, hav	ve appointed you
	presents do authorize you, at		
et a constant and a c	ne Edith Forte Rada		
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			and the second s
	700 7		
as witnesses in behalf of	Edith Forte Rada	in a cause	pending in our
Circuit Court in Baldwin Cou	anty, of said State, wherein	<u> Gith Forte Rada</u>	
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and <u>James J: Rada</u>	Ţ~	,	oonipianiani
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	tion of the witness Sand 1	return the same to our	Court, with all
convenient speed, under your	hand.		
Witness /3 day	of aug		
	ale	ce J. Du	k
		Co	Register.
Commissioner's Fee, \$			
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THE	STATE OF AL <i>F</i> Baldwin Coun		
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#### THE STATE OF ALABAMA

Baldwin County.

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

Edith Forte Rada	Complainant
VS.  James J. Rada, Jr.	
I, <u>Madeline S. Bryars</u>	
as Register and Commissioner	orte Rada and Lonnie Forte
witnesses named in the Requirement for Oral Examination of the Section of Section 195.	ation, on the 23 day of Angenet.
in Ray Minette , Alabama, and having fitruth, the whole truth, and nothing but the truth, the said Forte doth depose and say as fe	Edith Forte Rada and Lonnie

My name is Edith Forte Rada. I am over the age of twenty-one vears and I am the complainant in that cause pending in the Circuit Court of Baldwin County, Alabama, against James J. Rada, Jr., for divorce. We were married December 17, 1936 in Pensacola, Florida. He is over the age of twenty-one years. At the time of our marriage he was sober and industrious, but has within the last two years become an habitual drunkard and has gradually grown worse. He is drunk every weekend and sometimes his drinking sprees continue for several days. Because of his habitual drunkminess I left him on the 6th day of August, 1955 and we have not lived together as husband and wife since. We separated at Silver-hill in Baldwin County where we have resided for nearly twenty years.

Edith Forte Rala

My name is Lonnie Forte. I am the father of Edith Forte Rada, who is complainant in a suit against James J. Rada, Jr. for divorce in the Circuit Court of Baldwin County. When they married he was soper and industrious but within the last two years he has become and is persistently an habitual drunkard. They were married in Pensacola, Florida on the 17th day of December, 1936 and reside to Silverhill, in Baldwin County where they have resided nearly twenty years.

Lonnie Forte

I, <u>Madeline S. Bryars</u> , as R	egister and Commissioner hereby certify that
the foregoing deposition S on Oral Examination was	s 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 <u>and W. C. Beebe</u>	
at the time and place herein mentioned; that I have	e personal knowledge of personal identity of
said witness es or had proom made before me of the	ne identity of said witness25that 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	August , 195.5
<u> </u>	Nabeline & Bugos (L. S.)

, Regis	Vol. Page	Recorded in Registive Rec	Filed	Oral Deposition	Respondent	vs. Complainant	IN CIRCUIT COURT, IN EQUITY	THE STATE OF ALABAMA BALDWIN COUNTY	NO. PAGE
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Beeba& Swe	earingen	***************************************	·*····································	Ql.	· Q Q:	1
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THE STATE OF ALABAMA  Baldwin County		er en en de representation de l'entre de l'e	
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ACTION OF THE STATE OF THE STAT

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREENTINGS:

WE COMMAND YOU that you summon James J. Rada, Jr., to be and appear before the Judge of the Circuit Court of Baldwin County, in equity, 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 Edith Forte Rada against the said James J. Rada, Jr. and further 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 executior thereof.

Witness, Alice J. Duck, Register of said Circuit Court, this the 13 day of \_\_\_\_\_\_\_, 1955.

Ĭ

Register Duck

EDITH FORTE RADA

IN THE CIRCUIT COURT OF

COMPLAINANT

VS

BALDWIN COUNTY, ALABAMA,

JANES J. RADA, JR.

DEFENDANT

IN EQUITY

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

And now comes your complainant, Edith Forte Rada, and humbly complaining against James J. Rada, Jr., respondent, respectfully shows unto your Honor:

FIRST: That your complainant and the said James J. Rada, Jr., are each over the age of twenty-one years, and are residents of Silverhill in Baldwin County, Alabama, where they have resided for approximately twenty years continuously next preceding this date.

SECOND: That complainant and defendant were married at Pensacola, Florida on December 17, 1936, and have lived together as husband and wife until August 6, 1955 when they separated at Silverhill, in Baldwin County, Alabama.

THIRD: That the said defendant at the time of their marriage was a sober and industrious man, but in the last two years has become an habitual drunkard, and because of such habitual drunkenness this complainant was compelled to separate from him as aforesaid on August 6, 1955 in Silverhill in Baldwin County, Alabama.

WHEREFORE your complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said James J. Rada. Jr., party defendant hereto and by appropriate process require him 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 she shall be entitled to receive in the premises.

Beeke & Swearingen

complainant.

RECORDED

Edith Forte Rada

Vannes J. Radafr

Camplaint

AUG 12 1955

ALICE J. BUCK, Register

EDITH FORTE RADA

VS

JAMES J. RADA

DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN CCUNTY, ALABAMA,

IN EQUITY

Comes, James J. Rada, defendant in the above styled cause and answering complainant's complaint and every allegations therein made says the same are untrue, and he 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 her solicitor of record.

Witness my hand this the \(\sigma\) day of August, 1955.

James f. Rada. fr.

STATE OF ALABAMA

EMLDWIN COUNTY

I, Alling and State and County, hereby certify that James J. Rada whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of or the day the same bears date.

1955. Given under my hand and seal this the B day of Quy.

Motary Public, Baldwin Co., Mala.

James Raday

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FILED SUBJECT STATES

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