

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Peggy J. Langenbach, Complainant
vs.

Frederick J. Langenbach, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and Confession~~ 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 Peggy J. Langenbach is forever divorced from the said Frederick J. Langenbach for and on account of Cruelty

It is further ordered, adjudged and decreed by the Court that the Complainant Peggy J. Langenbach is hereby awarded the permanent care, custody and control of the said minor children born to the union of the said parties, namely, Tonie Carol Langenbach, a girl about four years old, Frederick Newton Langenbach, a boy about six years old, and Johnny Doyle Langenbach, a boy about three years old; with the Respondent being hereby given the right to visit said minor children at all reasonable times.

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 Frederick J. Langenbach the Respondent pay the cost herein to be taxed, for which executed may issue.

This 11 day of October, 1955.

Robert 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. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED
OCT 11 1955
J. H. HARRIS, Register

STATE OF ALABAMA, BALDWIN COUNTY

PEGGY J. LANGENBACH,)	
)	
Complainant)	IN THE CIRCUIT COURT OF
)	
vs.)	BALDWIN COUNTY, ALABAMA,
)	
FREDRICK J. LANGENBACH,)	IN EQUITY.
)	
Respondent)	

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,

Sitting in Equity:

Comes now the Complainant, PEGGY J. LANGENBACH, humbly complaining of the Respondent, FREDRICK J. LANGENBACH, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, PEGGY J. LANGENBACH, is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State for more than two years next preceeding the filing of this Bill of Complaint; that Respondent's address is Robertsdale, Baldwin County, Alabama.

SECOND: That your Complainant and Respondent were lawfully married on or about, to-wit: December 17, 1947, at Lucedale, Mississippi.

THIRD: Your Complainant avers and charges that the said Respondent did on or about the 3rd day of September, 1955, and on several occasions subsequently thereto assault, beat, hit and strike Complainant; that said Respondent has committed actual violence on her person attended with danger to her health or life. That your Complainant is reasonably convinced that if she continues to live with said Respondent, he will do her physical harm that will endanger her life and health. That since September 3, 1955, and as a result of said assault Complainant and Respondent have not lived together as husband and wife.

FOURTH: Complainant further avers and shows unto Your Honor that there were three children born to the union of said parties, namely as follows:

FREDRICK NEWTON LANGENBACH, a boy now about six years old; TONIE CAROL LANGENBACH, a girl now about four years old and JOHNNY DOYLE LANGENBACH, a boy now about three years old. Further that said minor children are now in the custody of their mother, your Complainant. Further that Complainant is a fit and proper person to be awarded the care, custody and control of said minor children.

FIVE: Complainant further avers and shows unto Your Honor that a property settlement has been had between the Complainant and Respondent.

PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said FREDRICK J. LANGENBACH be made party Respondent to this her Bill of Complaint and that a summons be issued and served upon him as required by law and the rules of this Honorable Court, and that he be required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause, Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said decree the Complainant will be granted the right to again contract marriage, that by virtue of said decree the Complainant will be awarded the permanent care, custody and control of the said minor children, FREDRICK NEWTON LANGENBACH, TONIE CAROL LANGENBACH and JOHNNY DOYLE LANGENBACH.

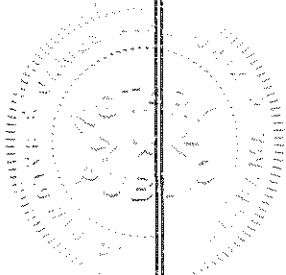
Complainant prays all other further and general relief to which she may be entitled, the premises considered and she will ever pray, etc.

Personally appeared before me PEGGY J. LANGENBACH, being known to me and being first duly sworn, deposes and says that she has read the allegations in the foregoing complaint and that to the best of her knowledge and belief said allegations are true in all respects.

Peggy J. Langenbach

Sworn to and subscribed before me this the 30 day of September, 1955.

James A. Hendrix
Notary Public, Baldwin County, Alabama.



PEGGY J. LANGENBACH,

Complainant

vs.

FREDRICK J. LANGENBACH,

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

ANSWER AND WAIVER


Comes now the Respondent, FREDRICK J. LANGENBACH, and for answer to the Bill of Complaint heretofore filed against him in said cause says as follows:

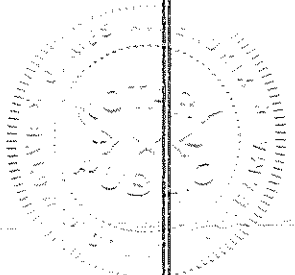
1. That he denies each and every allegation of the said Bill of Complaint and demands strict proof thereof.

And for further answer to said Bill of Complaint the Respondent hereby accepts service of a copy and notice of the filing of the said complaint and hereby waives any further notice to him of the day set for hearing, the taking of testimony or the submission for final decree of the above styled cause and does here consent that the same may be submitted and testimony taken without further notice to him.


Fredrick J. Langenbach

Sworn to and subscribed before me this the 30 day of September, 1955.


Notary Public, Baldwin County, Alabama.



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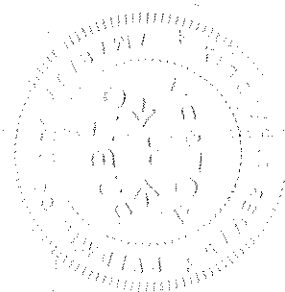
ANSWER AND WAIVER

PEGGY J. LANGENBACH,
Complainant

vs.

FREDRICK J. LANGENBACH,
Respondent

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



FILED
OCT 11 1955
ALICE J. RUCK, Register

PEGGY J. LANGENBACH.

Complainant

VS

FREDRICK J. LANGENBACH.

Respondent

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 and Waiver and testimony of Peggy J. Langenbach and Maggie Byrd as setout
in the Oral Deposition

and in behalf of Defendant upon.

James C. Hendrix

Deice J. Duncanson
Register.

Register

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

PEGGY J. LANGENRACH,

Complainant

vs.

FREDRICK J. LANGENRACH,

Respondent

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194.....

FILED

OCT 11 1955

Register.

ALICE J. BARK

By The Baldwin Times

Register

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Grady P. Gilbert, Jr.

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Peggy J. Langenbach and Maggie Byrd

a witnesses in behalf of Peggy J. Langenbach in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Peggy J. Langenbach is

Complainant and Fredrick J. Langenbach is

Respondent

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

Witness 30th day of September, 1955

Alice J. Smith
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3630

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

PEGGY J. LANGENBACH

Complainant

VS.

FREDRICK J. LANGENBACH

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Grady P. Gilbert, Jr.

WITNESSES:

Peggy J. Langenbach

Maggie Byrd

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Peggy J. Langenbach

Complainant

VS.

Fredrick J. Langenbach

Respondent

I, Grady P. Gilbert, Jr.

as ~~Register and~~ Commissioner

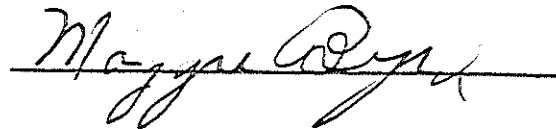
have called and caused to come before me Peggy J. Langenbach and Maggie Byrd as

witnesses named in the Requirement for Oral Examination, on the 30 day of September, 1955, at the office of James A. Hendrix in Robertsdale, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Peggy J. Langenbach and Maggie Byrd doth depose and say as follows:

My name is Peggy Langenbach, I am over twenty-one years old and have lived in Robertsdale, Baldwin County, Alabama, for more than the past two years. Fredrick J. Langenbach is over twenty-one years and lives in Robertsdale. Fredrick and I were married at Lucedale, Mississippi, on December 17, 1947. On about September 3, 1955, Fredrick did hit, beat and strike me, that he has done so on several occasions previously to this; I am convinced that if I continue to live with him he will do me bodily harm in some way, since the said day, September 3, 1955, and as a result of said assault he and I have not lived together as husband and wife. We have three minor children, Fredrick Newton Langenbach, a boy about six years old; Tonie Carol Langenbach, a girl about four years old and Johnny Doyle Langenbach, a boy about three years old. Said minor children are now in my custody and I feel I am a fit and proper person to be awarded the care, custody and control of said minor children. All property rights between Fredrick and me have been heretofore settled.



My name is Maggie Byrd, I have known for many years Peggy J. Langenbach and Fredrick J. Langenbach; they are both over twenty-one years old and have lived in Baldwin County for more than the past two years. They were married in Lucedale, Mississippi on December 17, 1947. On September 3, 1955, Fredrick did commit an assault upon Peggy by hitting, beating and striking her and this was by no means the first time he had done such and it appears to me that it would be unsafe insofar as her life and health are concerned to continue to live with him. They have three children, namely a boy, Fredrick Newton Langenbach, about six years old; a girl, Tonie Carol Langenbach, about four years old and a boy, Johnny Doyle Langenbach, about three years old. The said minor children are now in the custody of their mother, Peggy J. Langenbach, and further I believe hereto be a fit and proper person to have the permanent care, custody and control of said minor children.

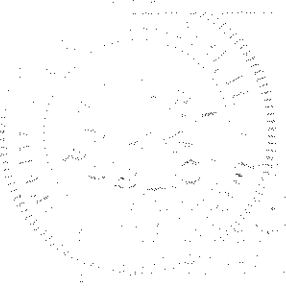


3630

ORAL EXAMINATION.

I, Grady P. Gilbert, Jr., 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 Grady P. Gilbert, Jr. 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 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 30th day of September 1955
Grady P. Gilbert, Jr. (L. S.)



NO. _____	PAGE _____
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
PEGGY J. LANGENBACH	
vs.	Complainant
FREDRICK J. LANGENBACH	
	Respondent.
Oral Deposition	
Filed _____, 195____	Record _____
Recorded in _____	Register _____
Vol. _____	Page _____
	Register _____

FILED
Oct 1 1955
Recorded in