

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

FREDDY FRANKLIN WILLIAMS

, Complainant

vs.

OLIVETTE C. WILLIAMS

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Conesso~~ 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 FREDDY FRANKLIN WILLIAMS is forever divorced from the said OLIVETTE C. WILLIAMS for and on account of

"ABANDONMENT"

It is further ORDERED, ADJUDGED AND DECREED that care, custody and control of the minor child, BARBARA GAYLE WILLIAMS, be, and it is hereby, given to the Respondent, OLIVETTE C. WILLIAMS, with the right of reasonable visitation in the complainant, FREDDY FRANKLIN WILLIAMS; and that the said FREDDY FRANKLIN WILLIAMS pay to the said OLIVETTE C. WILLIAMS the sum of Thirty (\$30.00) Dollars per month for the support and maintenance of said BARBARA GAYLE WILLIAMS.

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 FREDDY FRANKLIN WILLIAMS the Complainant pay the cost herein to be taxed, for which executed may issue.

This 8th day of November, 1955.

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. 3647 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED
NOV 8 1955
ALICE J. DUCK, Register

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

FREDDY FRANKLIN WILLIAMS

Complainant

VS.

OLIVETTE C. WILLIAMS

Respondent

I, JAMES R. OWEN

as ~~Register and~~ Commissioner

heretofore appointed by this Court

have called and caused to come before me Freddy Franklin Williams

witness named in the Requirement for Oral Examination, on the 7th day of November

1955, at the office of Telfair J. Mashburn, Jr.

in Bay Minette, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said Freddy Franklin Williams

doth depose and say as follows: "My names is FREDDY FRANKLIN WILLIAMS. I am the complainant in this cause and I am over the age of twenty-one years. I am a bona fide resident citizen of Baldwin County, Alabama, and have been for more than two years next preceding the filing of the bill of complaint in this cause. The respondent, OLIVETTE C. WILLIAMS, is over the age of twenty-one years, and is presently a resident of Mobile County, Alabama, residing at 1356 Culvert Street, Whistler, Alabama. I married the respondent at Leakesville, Mississippi, on the 5th day of September, 1950. We lived together as husband and wife until about the Month of September, 1952, when my wife left me and has refused to return to live with me as my wife since that time. I did nothing to cause my wife to leave me, and have often tried to get her to return but have been unsuccessful. We have one child, a daughter, BARBARA GAYLE WILLIAMS, who is now four years of age. She has been living with my wife and I believe that it is to her best interests to continue to live with my wife. I do not have a large income, but am willing to try to pay to my wife the sum of Thirty (\$30.00) Dollars per month for the support and maintenance of our daughter." Further Deponent says not.

Freddy Franklin Williams

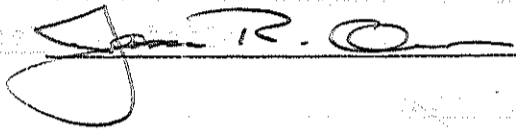
ORAL EXAMINATION

I, JAMES R. OWEN, 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.....and read over to him and he signed the same in the presence of myself and Telfair J. Mashburn, Jr.

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness.... or had proof made before me of the identity of said witness.....; 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 7th day of November, 1955.

 (L. S.)

NOTED BY CLERK OF COURT
JAMES R. OWEN, Commissioner
The State of Alabama
Baldwin County
In Circuit Court, In Equity
vs.
Complainant
Respondent
Oral Deposition
Filed
1955
Recorded in
Vol.
Page
Register

FREDDY FRANKLIN WILLIAMS
Complainant
vs.
OLIVETTE C. WILLIAMS
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: Freddy Franklin Williams

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

Jeffrey A. Madbury, Jr.
Solicitor for Complainant

NOTE:

Complainant suggests the name of JAMES R. OWEN
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Jeffrey A. Madbury, Jr.
Solicitor for Complainant.

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: JAMES R. OWEN

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 FREDDY FRANKLIN WILLIAMS

as witnesses in behalf of FREDDY FRANKLIN WILLIAMS in a cause pending in our Circuit Court in Baldwin County, of said State, wherein FREDDY FRANKLIN WILLIAMS

is the _____, Complainant
and OLIVETTE C. WILLIAMS

is the _____ Respondent

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

Witness 7th day of November, 1945.

Barry J. Smith
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

FREDDY FRANKLIN WILLIAMS,
Complainant,
VS.
OLIVETTE C. WILLIAMS,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

ANSWER AND WAIVER

Comes the respondent in the above styled cause and accepts service of a bill of complaint in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause and consents that the same may be taken and the cause submitted for final decree at any time.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. She admits the allegations contained in paragraph 1 of said bill of complaint.
2. She admits the allegations contained in paragraph 2 of said bill of complaint.
3. She denies the allegations contained in paragraph 3 of said bill of complaint and demands strict proof thereof.
4. She admits the allegations contained in paragraph 4 of said bill of complaint.

Olivette C. Williams
Respondent.

STATE OF ALABAMA,
COUNTY OF MOBILE.

I, Irish M. Kelly, a Notary Public in and for said County and State, hereby certify that OLIVETTE C. WILLIAMS, whose name is signed to the foregoing Answer and Waiver, and who is known to me, acknowledged before me on this date that, being informed of the contents of the said Answer and Waiver, she executed the same voluntarily.

Witness my hand and official seal this 5th day of October,

1955.

Irish M. Kelly
Notary Public, Mobile County, Ala.

Notary Public, Mobile County, Alabama
My Commission Expires March 26, 1958

FREDDY FRANKLIN WILLIAMS,	0	
	0	
Complainant,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
OLIVETTE C. WILLIAMS,	0	IN EQUITY. NO. _____
	0	
Respondent.	0	

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

Your complainant, FREDDY FRANKLIN WILLIAMS, respectfully
represents and shows unto your Honor:

1. That complainant is over the age of twenty-one years
and is a resident of said State and County, and has been a bona
fide resident of said State for more than two years next pre-
ceding the filing of this bill of complaint; that OLIVETTE C.
WILLIAMS is over the age of twenty-one years and resides in Mobile
County, Alabama.

2. That your complainant and the respondent were lawfully
married on or about, to-wit: the 5th day of September, 1950, at
Leakesville, Mississippi.

3. That the said respondent voluntarily abandoned the bed
and board of complainant for more than one year next preceding the
filing of this bill of complaint, since which time complainant and
respondent have not lived together nor in any way recognized each
other as husband and wife.

4. That there was one child born to this marriage, BARBARA
GAYLE WILLIAMS, who is now four years of age; that the respondent
is a fit and proper person to have the care, custody and control
of said child; and that your complainant is willing to pay Thirty
(\$30.00) Dollars per month for the maintenance and support of said
child.

The Premises Considered, your complainant makes the said
OLIVETTE C. WILLIAMS a party respondent to this bill of complaint,
and in order that complainant may have the relief herein prayed for,
may it please your Honor to cause the State's Writ of Subpoena to
be issued, directed to the said OLIVETTE C. WILLIAMS, commanding
her to answer, plead or demur to this bill of complaint within the
time required by law; and that, on a final hearing of this cause,
your Honor will enter a decree divorcing your complainant from said

respondent, granting both parties the right to remarry; giving custody of their minor child, BARBARA GAYLE WILLIAMS, to the respondent, with rights of reasonable visitation in the complainant, and the right to have the child visit him at reasonable times; and fixing a reasonable sum for the complainant to pay to the respondent for the maintenance and support of said minor child; and your complainant prays for such other, further, different or general relief as unto your Honor may seem just and proper, and, as in duty bound, your complainant will ever pray, etc.

Julian A. Massenburg, Jr.
Solicitor for Complainant.

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BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. 3647

FREDDY FRANKLIN WILLIAMS,
Complainant,

VS.

OLIVETTE C. WILLIAMS,
Respondent.

BILL OF COMPLAINT.

FILED
NOV 7 1955
ALICE J. DUCK, Register