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

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ich execution may issue.
Circuit Court, In Equity.
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Circuit Court, In Equity.

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No.33558

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THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

FRANKIE PLOWMAN

Complainant

vs.

DOUGLAS L. PLOWMAN

Respondent

#### DIVORCE DECREE

FILED SET L30 1954

ALICE J. DECK, Register

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The	State	of	Alabama,
	Baldwi	n C	ounty.

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

	RANKIS PLCGARA	Complainant	
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Ty	MIGIAS 7 BICTOL W	Respondent	
Thurst booms in any			*
as Register and Commissioner			
in the second second to come by	efore me <u>Frankia Plasson</u>	and Hatel & Thomson	
have called and caused to come of	elore me		
witness_25_named in the Requir	ement for Oral Examination, on	the 29th day of Sept	ember -
19_50_, at the office of	C. Lodin Thomson		
in Bar Minetie,	, Alabama, and having fi		-
truth, the whole truth, and noth	ling but the truth, the said $\stackrel{\mathbb{F}}{=}$	nankie Flowman and	<u> Hattie Fhompso</u>
	—doth depose and say as follows		

That my name is Frinkie T. Plowman, I am over the age of 18 years and a resident of Baldwin County, Alabama and have been all my life. The Respondent, Douglas Plowman is over the age of 20 years and was a resident of Baldwin County but is now temporarily residing in Tuscalocsa. We were married July 10, 1951, in Columbus, Mississippi, and lived together as husband and wife until September 21, 1952, at which time the respondent abandoned me without fault on my part, there was born as fruits of this marriage one child, Linda Well Plowman, now age about 18 mentas. She has been in my care, custody and control since birth and I respectfully represent unto this Honorable Court that I am a fit, suitable and proper person to have her permanent care, custody, and control. I respectfully request this Honorable Court to order a decree that \$10.00 supportfor my minor child be provided by the Respondent as a reasonable amount for such support. I know we can never live together again as husband and wife and there I ask for this divorce.

Frankie Plouman

That my have is Mattie Thompson, I known both parties to this cause, the Complainant is over the age of 18 and the respondent is around 20 years old. They were rarried in Columbus, Mississippi on July 10, 1951, and lived together as husband and wife until about the last part of September, 1952, at which time the respondent abandoned the complainant with ut fault on her part as far as I know. There was born as fruits of this marriage one child, I inda Well Plomman, age about 18 months, the complainant has had the comstant care, custody and control of this child and I respectfully summit unto this Honorable Court that the Complainant is a fit, suitable and proper person to have the permanent care, custody and control of Linda Well Ployman. I do not believe that they will ever live together agains as husband and wife.

Hattie Shomperen

1 Ivrleene Mixon	, as Register and Commissioner hereby certify
that the foregoing deposition_s_on Oral Examination of the witness_ss_and read over toand	was taken down by me in writing in the words
and C. Lawoir Thomason	
at the time and place herein mentioned; that I have pe	ersonal knowledge of personal identity of said wit-
ness@S or had proom 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 envel	lope to the Register of said Court.
Given under my hand and seal, this 22th	
Given under my hand and seal, this $\alpha$ 7.	day of
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## THE STATE OF ALABAMA, Baldwin County.

#### CIRCUIT COURT

TO:	Juri sama libron
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	7 YE: that we, having full faith in your prudence and competency, have appointed y
	ner, and by these presents do authorize you, at such time and place as you may appoi
to call befo	ore you and examine Frankie Ploman and Hattie Thompson
ac mitaess	es in behalf ofFrankie Plowman in a cause pending in c
	es in ochan or in a cause penang in c
Circuit Cou	urt in Baldwin County, of said State, wherein
	Frankie Playman
<b>,</b>	
	, Complainant
and	
	Dougles Plogran
	Respondent
on oath to	be by you administered, upon
	d certify the deposition of the witness and return the same to our Court, with
	speed, under your hand.
Witness	s 19 day of Sept , 1954
TO TOLL COL	ay of Alice Register.
	Were A where
	Register.
Commission	ner's Fee, \$
	'ees, \$

STATE OF ALABARA BALDREN OCCUPY

TO ARY SHARIPF OF THE STATE OF ALABADA:

You are herely con anded to summons Douglas L. Plowman, to appear and plead, answer or denur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity by Frankie Plowman as Complainant and against Pouglas Flowman, as Respondent.

Witness my hand this the \_\_\_\_ day of September, 1954.

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FRANKIE	FLOWIAH,	Ň	IN THE CIRCUIT COURT OF	v	
	COMPLATMANT,	Ž.	Baldan count, alabah		
VS		Ž.	IN BOUITT.		
DCUGLAS	I. FICWAN,	∑. V	•		
	BESHONDERT,	X, K			

TO HONORABLE HUBERT M. HALL, JUDGE OF THE GEROUIT SOURT OF BALDIEW COUNTY, ALABABA, IN EQUITY:

Your Complainant, Frankine Picwman, respectfully represents unto your Monor and this Concrable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama and over twenty-one years of age, the Respondent is also a bona fide resident of Baldwin County, Alabama, and over 21 years of age.

2.

That your Jomplainant and the Respondent married at Solumbus, Mississippi, on July 10, 1951, and lived together as husband and wife until, on to-wit, September 21, 1952.

3.

That on to-wit September 21, 1952, while your Complainant and Respondent were living together as husband and wife, in Eldwin County, Alabara, the Respondent volunturily abundoned the bed and board of your Complainant and has remained away volunturily and continuously since that time.

Li,

There was born as fruits of this marriage between the Complainant and the Respondent, one child; Linda Well Plowman, age about 18 months, that the mother of said child is a suitable, fit and proper person to have the care, custody is and central of this child.

WHEREFORE, the premises considered, your Josphainant brays that your Honor will by proper procedure make the said Douglas L. Plowman, party Respondent to this bill of complaint requiring him to plead, answer or denur to the same within the time and under the benalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce forever barring the bonds of matrimony existing between her and the Respondent that a decree be made awarding to her the custody, care and control of the minor child, Linda Well Plowman, age about 16 months; Tour Complainant prays for such other, further different or general relief as she may be in equity and good conscience entitled to receive.

FILED 9-29-54

ALIGE I. CLOK, Clork

FRANKIE PLOSMAN

Complainant

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DOUGLAS PLOWMAN

Respondent

IN THE CIRCUIT COURT OF
BALDWIN CCUNTY, ALABAMA
IN EQUITY

Now comes the Respondent and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages and marriage and residence, but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complaint; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without notice.

Douglas I Plouman

STATE OF ALABAMA BALDWIN COUNTY

Given under my hand and seal on this the \_\_\_\_\_ day of September,



-4116 1. Will, Clerk

Notary Public.