

(2722)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

H. L. PIERCE

, Complainant

vs.

LAURA PIERCE

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Personal Service 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 H. L. PIERCE is forever divorced from the

said LAURA PIERCE for and on account of

"ABANDONMENT"

It is further ORDERED, ADJUDGED AND DECREED that the Respondent be, and she is hereby, authorized to resume the use of her former name, "LAURA KELLER".

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 the payment of the cost of this suit.

It is further ordered that H. L. PIERCE the Complainant pay the cost herein to be taxed, for which execution may issue.

This 18 day of June, 1953

Hubert McCall
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 11

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED
JUN 18 1953
ALICE J. BUCK, Clerk

H. L. PIERCE
Complainant,
VS.
LAURA PIERCE
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO. ~~XXX~~ 2722

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
H. L. PIERCE and JANETTE GECI
Alabama, the place of trial of said cause, to-wit: Fairhope, Alabama

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

Jelfer J. Malleberry 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.

Jelfer J. Malleberry Jr.
Solicitor for Complainant.

DEMAND FOR ORAL EXAMINATION.

.....
Complainant,

Vs.

.....
Respondent.

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

Filed this17th day of June.....,
1942-3-

.....*Asie J. Leuck*.....
Register.

The State of Alabama, { Circuit Court of Baldwin County, Alabama
Baldwin County. (In Equity)

H. L. PIERCE

Complainant

VS.

LAURA PIERCE

Respondent

I, James R. Owen

~~XXXXXX~~ Commissioner

have called and caused to come before me H. L. Pierce and Jannett Geci

witness es named in the Requirement for Oral Examination, on the 17th day of June

195s, at the office of Telfair J. Mashburn, Jr.

in Bay Minette, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said H. L. Pierce

doth depose and say as follows: "My name is H. L. Pierce, and I am the Complainant in this cause. I am over the age of twenty-one years, and I have lived in Baldwin County, Alabama, all of my life. Laura Pierce, the Respondent, is over the age of twenty-one year and she is a bona fide resident citizen of Baldwin County, Alabama, residing at Fairhope, Alabama. I married the Respondent in Pensacola, Florida, on November 2, 1944, and we lived together as husband and wife in Baldwin County, Alabama, until September 15, 1950. On September 15, 1950, the Respondent packed her things and moved out of my house, and has refused since that time to live with me as my wife. I did nothing to cause my wife to leave me and I have asked her repeatedly to return, but she has refused to do so. My wife and I have made a financial settlement out of court." Further deponent says not.

H. L. Pierce

The said Jannett Geci doth depose and say as follows: "My name is Jannett Geci; I am over the age of twenty-one years and am a resident of Baldwin County, Alabama. I am the granddaughter of the Complainant in this cause, H. L. Pierce; and I was living in the home with him during the time he was married to, and living with, the Respondent, Laura Pierce. I know that he married Laura Pierce about the 2nd day of November, 1944; and I know that they lived together as husband and wife, in Baldwin County, Alabama, until about the 15th day of September, 1950. I know that Laura Pierce moved out of my Grandfather's house about the 15th day of September, 1950, and that she has not returned to live with him as his wife since that time. I was in his home and I know that he gave her no cause to leave him." Further Deponent says not.

Jannett Geci

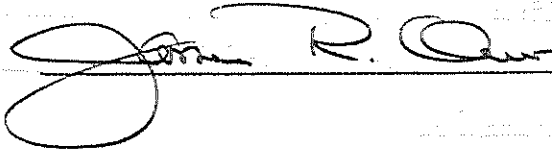
ORAL EXAMINATION

I, James R. Owen, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition S 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

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof 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 17th day of June, 1953

 (L. S.)

No. _____
Page _____

The State of Alabama
Baldwin County.


In Circuit Court, In Equity

vs. Complainant

Respondent

Oral Deposition

Filed 6-18, 1953

 Register

Recorded in

Record

Vol. _____

Page _____

, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons LAURA PIERCE, 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 H. L. PIERCE, as Complainant and against LAURA PIERCE as Respondent.

WITNESS my hand this the 20th day of September, 1951.

W. J. Pierce
Register

H. L. PIERCE

COMPLAINANT

VS

LAURA PIERCE

RESPONDENT

Q

Q

Q

Q

Q

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. _____

TO HONORABLE TELFAIR J. MASHEURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, H. L. Pierce, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both over twenty-one years of age and bona fide residents of Baldwin County, Alabama.

2.

That your Complainant and the Respondent married at Pensacola, Florida, on November 2, 1944, and lived together as husband and wife in Baldwin County, Alabama, until September 15, 1950.

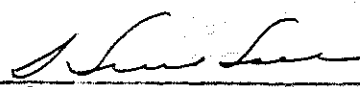
3.

That the Respondent on September 15, 1950, voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Laura Pierce party respondent to this cause of action, requiring her to plead, answer or demur to the

same within the time and under the penalties prescribed by law and the practice of this Honorable court.

Your Complainant prays that upon a hearing hereof, Your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

Received in Sheriff's Office
is 27 day of Sept, 1951
AYLOR WILKINS, Sheriff

No. 2722

N. L. Pierce **RECORDED**

vs
Laura Pierce

dated 9-24 1951
serving copy of within Summons and
Complaint on

Laura Pierce

Taylor Wilkins Sheriff
By H. F. Hall Deputy Sheriff

FILED
SEP 20 1951

ALICE J. DUCK, Register

Respectfully
Jambor

THE STATE OF ALABAMA,
Baldwin County

No. _____ Circuit Court, In Equity.

H. L. PIERCE

Complainant.---

Vs.

LAURA PIERCE

Defendant.---

Motion is hereby made for a Decree Pro Confesso against LAURA PIERCE

Defendant.---

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ----; and that said summons was duly served according to law, and that said Defendant -- ha S failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 16th d _____ day of June 19 53

Jeffery M. McGehee
Solicitor.

RECORDED

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

Vs.

Motion for Decree Pro Confesso on
Personal Service

Filed 6-16 19 53

Arice J. Smith
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

CIRCUIT COURT COMPLAINT

Printed by the Baldwin Times, Bay Minette, Alabama.

H. L. PIERCE
Complainant,
Vs. LAURA PIERCE
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____
Laura Pierce

by the Sheriff of Baldwin County, on the 28th day of September,
1951

And it further appears to the Register, that that the said LAURA PIERCE

_____ the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,

on motion of Telfair J. Mashburn, Jr. Solicitors

for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,

and it hereby is, in all things taken as confessed against the said LAURA PIERCE

This 16th day of June, 1953

Archie H. Hensley
Register.

RECORDED
No. _____

CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY

Complainant,

Vs.

Respondent.

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued this 16th day of June
1942.

W. J. H. H. H.
Register.

COMMISSION TO TAKE DEPOSITIONS

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 H. L. Pierce and Janette Geci

as witnesses in behalf of H. L. Pierce in a cause pending in our Circuit Court in Baldwin County, of said State, wherein H. L. Pierce

is the _____, Complainant
and Laura Pierce

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

Witness 17th day of June, 1953

Livingston J. Duck
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Complainant—

vs.

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

H. L. PIERCE

vs.

LAURA PIERCE

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,
Motion for Decree Pro Confesso on Personal Service, Decree Pro
Confesso on Personal Service, and testimony of H. L. Pierce and
Janette Ceci

and in behalf of Defendant upon

Jeffrey A. Middleberry, Jr.
Solicitor for Complainant.

David J. Resnick

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

vs.

NOTE OF TESTIMONY

Filed in Open Court this 18th

day of June, 1947

Archie H. H. H.
Register.

Printed By The Baldwin Times

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