

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARTHA WIGSTROM Cross, Complainant
vs.

ADOLF L. WIGSTROM Cross, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree For Confession~~ Answer and Cross
Bill and Answer by Cross Respondent, and Testimony as noted by the Register, and upon con-

sideration 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 MARTHA WIGSTROM is forever divorced from the

said ADOLF L. WIGSTROM for and on account of

CRUELTY

It is further Ordered, Adjudged and Decreed that the Contract and Agreement providing for custody and maintenance, and all of its terms and conditions are hereby ratified and confirmed.

It is further Ordered, Adjudged and Decreed that the Complainant and Cross Respondent pay the sum of One Hundred Dollars as attorney fees for the Respondent as prayed.

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 Adolf L. Wigstrom the Cross Respondent pay the cost herein to be taxed, for which execution may issue.

This 14th day of February, 1952.

J. Edgar J. Moorebury, Jr.
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

FEB 25 1952

ALICE J. DUCK, Register

2741

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Ora S. Nelson

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 Martha Wigstrom and Mrs. John Olson

as witnesses in behalf of Cross Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Adolph L. Wigstrom is

Complainant
and Martha Wigstrom is

Respondent
on oath, to be by you administered, upon Martha Wigstrom and Mrs. John Olson
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 14th day of February, 1952

Walter J. Hester

Register.

Commissioner's Fee, \$5.00

Witness' Fees, \$

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Adolph L. Wigstrom

Complainant

VS.

Martha Wigstrom

Respondent

I, Ora S. Nelson

as Register and Commissioner in Chancery

have called and caused to come before me Martha Wigstrom and Mrs. John Olson

witness es named in the Requirement for Oral Examination, on the 14 day of February
1952, at the office of Telfair J. Mashburn, Jr., Circuit Judge
in Bay Minette, Alabama, and having first sworn said Witnesses es to speak the
truth, the whole truth, and nothing but the truth, the said Martha Wigstrom and Mrs.
John Olson doth depose and say as follows:

ORAL EXAMINATION.

I, Ora S. Nelson, as Register and Commissioner hereby certify that the foregoing deposition son Oral Examination was taken down by me in writing in the words of the witnesses and read over to them and they signed the same in the presence of myself and Cecil G. Chason

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 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 14th day of February, 194 52

Ora S. Nelson (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed _____, 194

, Register.

Recorded in

Record

Vol. _____ Page _____

, Register.

MARTHA WIGSTROM,

Complainant,

VS.

ADOLF L. WIGSTROM,

Respondent.

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

TESTIMONY OF MARTHA WIGSTROM

My name is Martha Wigstrom. I am over the age of twenty-one years and a resident of Silverhill, in Baldwin County, Alabama. My husband, Adolf Wigstrom, is over the age of twenty-one years and a resident of Baldwin County, Alabama. We were married in Hollywood, California on October 21, 1937 and lived together as man and wife until recently. We have of this marriage four children as are named in my Bill of Complaint for divorce and one which will be born within the near future. On several occasions in the past Adolf Wigstrom has committed actual violence on my person, has struck me with his fist and has otherwise injured me. Recently he has made threats on my life so that I am now afraid to live with him any longer for I am afraid that he will kill me.

Martha Wigstrom

TESTIMONY OF MRS. JOHN OLSON

My name is ^{Mrs.} John Olson. I am over the age of twenty-one years and a resident of Baldwin County, Alabama. I am the mother of Martha Wigstrom and am personally acquainted with Adolf Wigstrom. I have knowledge that Adolf Wigstrom has committed actual violence on the person of Martha Wigstrom, his wife, and I have seen her bruised face where he had struck her with his fist. I also know that he has been making many threats that he was going to kill her and I believe she is reasonable in feeling that if she lives with him he will do so.

Mrs. John Olson

ADOLF L. WIGSTROM,) (
Complainant,) (IN THE CIRCUIT COURT OF
-vs-) (BALDWIN COUNTY, ALABAMA
MARTHA WIGSTROM,) (IN EQUITY
Respondent.) (Case No. 2741

Comes the respondent in the above styled cause and, for answer to the Bill of Complaint heretofore filed, respondent says:

1. She admits the allegations contained in Paragraph 1 of the Bill of Complaint.

2. She admits the allegations contained in Paragraph 2 of the Bill of Complaint, but shows unto the Court that the spelling of the name Chris in the said complaint is in error, the proper spelling being Kres.

3. She denies the allegations contained in Paragraph 3 of the Bill of Complaint.

4. She denies the allegations contained in Paragraph 4 of the Bill of Complaint.

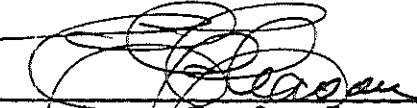
The respondent further shows unto the Court that she and the complainant still live together as man and wife to this date and recognize and conduct themselves in all ways as husband and wife and, although respondent emphatically denies that she has committed adultery with anyone, she shows that, had she been guilty of adultery as set out in the Bill of Complaint, there has been condonation.

The respondent further shows that the complainant does not have sole custody of the children named in the complaint but that the complainant, the respondent and the four children live together as one family.

Respondent further shows unto the Court that she has no funds or income of her own and is entirely dependent on the complainant for her support and maintenance, and that she has no funds with which to employ an attorney to defend her in this cause and to preserve her rights as may be found just and proper.

Respondent further shows that complainant has considerable property and sufficient income with which to provide her with ade-

quate funds to employ counsel; she, therefore, prays that your Honor will direct and decree that the complainant pay the sum of One Hundred Fifty Dollars (\$150.00) as alimony pendente lite, to be used to procure the service of an attorney at law to defend her in this cause. The respondent further prays for any other different or general relief to which she may be entitled.


Attorney for Respondent

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.-----

-----TERM, 194-----

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon MARTHA WIGSTROM, Silverhill, Alabama

to appear and plead, answer or demur, within thirty days from the service hereof, to the Complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against MARTHA WIGSTROM

_____, Defendant.---

by ADOLF L. WIGSTROM

_____, Plaintiff.---

Witness my hand this 7th day of Nov 1941

Archie J. Jensen, Clerk.

STATE OF ALABAMA
BALDWIN COUNTY

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

ADOLF L. WIGSTROM,
Complainant

vs.

MARTHA WIGSTROM,
Respondent

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF SAID
COURT, IN EQUITY SITTING:

Comes your Complainant, Adolf L. Wigstrom, in the above
styled cause and respectfully shows unto your Honor the following:

1. That your Complainant is over the age of 21 years and a bona fide resident of Baldwin County, Alabama, and has for more than five years next preceeding the filing of this bill resided near Silverhill, Alabama; that Respondent, Martha Wigstrom, is over the age of 21 years and is a bona fide resident of Baldwin County, Alabama.
2. That your Complainant and Respondent were lawfully married and have lived together as man and wife for the past ten years; ~~that your Complainant and Respondent now have four children as a~~ result of this union, namely; Helen Wigstrom, age 8 years, Grace Wigstrom, age 7 years, Chris Wigstrom, age 6 years, and Gloria Wigstrom, age 3 years.
3. That your Complainant desires the care, custody and control of two of these children; namely, Helen Wigstrom and Chris Wigstrom; that your Complainant now has the care, custody and control of these children; that your Complainant is a fit and proper person to have such care, custody and control; and that your Complainant has a home in which these children may be given proper care.
4. That since Complainant's marriage to Respondent, Complainant believes, and on such belief, alleges, that Respondent has committed adultery with divers parties and persons whose names to your complainant are unknown; specifically, on or about the 20th day of June, 1951.

WHEREFORE, THE PREMISES CONSIDERED, your Complainant prays that the said Martha Wigstrom be made a party Respondent to this his Bill of Complaint and that all proper process of service be directed to her requiring her to plead, answer or demur within the time required by law, failing this, a decree pro confesso to be granted your Complainant.

PREMISES FURTHER CONSIDERED, your Complainant respectfully prays that upon the final hearing in this cause your Honor will enter a decree granting him relief as follows:

- (a) Divorcing your Complainant from said Respondent, granting your Complainant the right to remarry.
- (b) Granting your Complainant the care, custody and control of the said Helen Wigstrom and Chris Wigstrom.

And your Complainant prays for such other, further and different relief as in the premises may seem to your Honor just and proper, as to which your Complainant will in duty bound ever pray.

MILLER AND MILLER

BY:

A. B. Miller

Attorneys for Complainant

ADOLPH L. WIGSTROM,
Complainant

Ovs.-

MARTHA O. WIGSTROM,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes your Petitioner, MARTHA O. WIGSTROM, and shows by this, her petition, that ADOLPH L. WIGSTROM was ordered by this Court, on to-wit the 14th day of February, 1951, to pay this Petitioner the sum of Ten Dollars (\$10.00) per week and provide for the clothing, medical expenses, fuel, and necessities for his five children, and that the said Adolph L. Wigstrom did leave the State of Alabama and failed to comply with the orders of this Court.

Petitioner further shows that she has been reliably informed and on such information believes and states that the said Adolph L. Wigstrom is now in Fairhope, Alabama, but may leave shortly.

WHEREFORE, Petitioner prays that the Court will forthwith order the said Adolph L. Wigstrom to be brought before this Honorable Court to show why he should not be held in contempt of this Court for failing to comply with the orders aforesaid, and that the Court will order the arrest of the said Adolph L. Wigstrom and require him to be held or furnish sufficient bond to insure his appearance at the hearing above mentioned, and that on a final hearing of this decree the court will make such further orders as the premises may justify.

STATE OF ALABAMA:
BALDWIN COUNTY:

Martha O. Wigstrom
Petitioner.

Before me, the undersigned Notary Public, personally appeared Martha O. Wigstrom, who being duly sworn deposes and says that the facts alleged in the foregoing petition are true.

Martha O. Wigstrom
Affiant

1954. Subscribed and sworn to before me this the 16 day of August,

[Signature]
Notary Public, Baldwin County, Alabama.

ADOLF L. WIGSTROM,) (IN THE CIRCUIT COURT OF
Complainant,) (BALDWIN COUNTY, ALABAMA
-vs-) (IN EQUITY
MARTHA WIGSTROM,) (Case No. 2741
Respondent.) (

Comes the respondent in above styled cause and without waiving or in any wise modifying the answers heretofore filed by her in said cause. Respondent respectfully shows unto the Honorable Court as follows:

1. That the Complainant and the Respondent are over the age of twenty-one years and are residents of Baldwin County, Alabama.

2. That the Complainant and Respondent were lawfully married and there has been born of this marriage four children, namely, Helen Wigstrom, Grace Wigstrom, Kres Wigstrom and Gloria Wigstrom and that your respondent is now bearing another child of this marriage which will be born within the near future.

3. That the Respondent avers and charges that the Complainant in the original Bill of Complaint has committed actual violence on her person attended with danger to her life or health and that he has made numerous threats of doing her other and further physical harm and from his manner and conduct toward her she is reasonably convinced and apprehensive that he will commit other and further actual violence on her person attended with danger to her life or health.

4. The Respondent has the care, custody and control of the children above named.

5. Respondent shows that she and the Complainant have a home and farm in or near Silverhill, Baldwin County, Alabama, and that it is comprised of approximately sixty acres and that title to the twenty acres on which their home is located is in the name of the Complainant and that title to the forty acres is in her name and the name of the Complainant jointly.

THE PREMISES CONSIDERED, the Respondent prays that this may be taken as and for her Cross-Bill in the above styled cause and that copies be served upon the Complainant as required by law so

that he may be made a party defendant hereto and that upon a hearing that the Court direct the Respondent to convey to her by proper Warranty Deed all of his right and title to the property herein above enumerated and that he be required to convey to her any farm machinery or personal property located on the premises and all livestock, all of which shall be considered as alimony and that he be required to pay the sum of One Hundred Dollars (\$100.00) per month as support for the children of this marriage as above named and that she be granted a divorce from the Complainant and Cross-Respondent and that she be granted the sum of One Hundred Fifty Dollars (\$150.00) as her attorney's fee in this cause.

Respondent and Cross-Complainant

Attorney for Respondent and Cross-Complainant.

ADOLF L. WIGSTROM,

Complainant,

vs

MARTHA WIGSTROM,

Respondent,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Case No. 2741

Comes the Complainant and Cross-Respondent and for answer to Cross-Complainant filed by the Respondent and Cross-Complainant says:

1.

As to paragraph one he admits the allegation thereof.

2.


As to paragraph two he admits the allegation as to two children and denies the allegation as to the remaining number.

3.

As to paragraph three he denies the allegation there of demand strict proof.

4.

As to paragraph four and paragraph five he admits the allegation thereof.


Attorney for Complainant and Cross-respondent

LAW OFFICES

RICKARBY & RICKARBY

ELLIOTT G. RICKARBY
(DECEASED)

FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

19 August 1954

Honorable Taylor Wilkins
Sheriff
Bay Minette, Ala.

Dear Taylor:

Re: Adolph L. Wigstrom
Vs: Martha O. Wigstrom

Mr. Wigstrom is now with Mr. Amon Gates, who lives
on 353 Ann Street, Fairhope, Alabama.

The phone number is 8133, Fairhope.

Yours very truly,



E. G. Rickarby, Jr.

R/i

This Subject out of
state his Sister states
that he Teyakana
Tup

ADOLPH L. WIGSTROM,

Complainant

-VS-

MARTHA O. WIGSTROM,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

This day came MARTHA O. WIGSTROM and filed her verified petition praying that ADOLPH L. WIGSTROM be required to appear and show cause if any he have, why he should not be punished as for a contempt in regard to his failure to pay support as ordered by this Court and upon consideration of said petition it is

ORDERED, ADJUDGED and DECREED by the Court that Adolph L. Wigstrom appear before the Court at Bay Minette, Alabama, at 10 a.m., on the 28 day of August, 1954, in the Courtroom of the Circuit Court of Baldwin County, Alabama, at Bay Minette, and show cause, if any he have, why he should not be punished as for a contempt; that a copy of this petition and of this rule to show cause be served forthwith personally upon the said Adolph L. Wigstrom by the Sheriff of Baldwin County, Alabama.

Done this the 28 day of August, 1954.

Hubert M. Green
Circuit Judge.

ADOLPH L. WIGSTROM,
Complainant

Ovs-

MARTHA O. WIGSTROM,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes your Petitioner, MARTHA O. WIGSTROM, and shows by this, her petition, that ADOLPH L. WIGSTROM was ordered by this Court, on to-wit the 14th day of February, 1951, to pay this Petitioner the sum of Ten Dollars (\$10.00) per week and provide for the clothing, medical expenses, fuel, and necessities for his five children, and that the said Adolph L. Wigstrom did leave the State of Alabama and failed to comply with the orders of this Court.

Petitioner further shows that she has been reliably informed and on such information believes and states that the said Adolph L. Wigstrom is now in Fairhope, Alabama, but may leave shortly.

WHEREFORE, Petitioner prays that the Court will forthwith order the said Adolph L. Wigstrom to be brought before this Honorable Court to show why he should not be held in contempt of this Court for failing to comply with the orders aforesaid, and that the Court will order the arrest of the said Adolph L. Wigstrom and require him to be held or furnish sufficient bond to insure his appearance at the hearing above mentioned, and that on a final hearing of this decree the court will make such further orders as the premises may justify.

Martha O. Wigstrom
Petitioner.

STATE OF ALABAMA:
BALDWIN COUNTY:

Before me, the undersigned Notary Public, personally appeared Martha O. Wigstrom, who being duly sworn deposes and says that the facts alleged in the foregoing petition are true.

Martha O. Wigstrom
Affiant

Subscribed and sworn to before me this the 16 day of August, 1954.

[Signature]
Notary Public, Baldwin County, Alabama.

STATE OF ALABAMA

BALDWIN COUNTY

THIS CONTRACT AND AGREEMENT entered into in duplicate on this the 14th day of February, 1952, by and between Martha Wigstrom, hereinafter referred to as the party of the first part, and Adolf L. Wigstrom, hereinafter referred to as the party of the second part, WITNESSETH:

THAT WHEREAS, the parties hereto are contemplating a divorce, a Bill of Complaint for which has been filed by the party of the second part, and ANSWER and Cross Bill having been filed by the party of the first part; and

WHEREAS, the parties hereto anticipate a divorce being granted:

NOW, THEREFORE, in consideration of the mutual covenants and agreements herein contained and the sums to be paid as hereinafter provided and the Decree of Divorce anticipated, the parties MUTUALLY AGREE as follows:

1. That the party of the first part shall have the care, custody and control of the children named in the Bill of Complaint and Cross Bill and of the child to be hereafter born, with the party of the second part having rights of reasonable visitation.
2. That the party of the second part shall pay to the party of the first part the sum of TEN DOLLARS (\$10.00) per week for support and maintenance of the said minor children, and in addition thereto shall furnish fresh meats, butane for the home as presently used, electricity as presently used unless the use thereof is increased by the party of the second part, and shall furnish clothing of the type and kind presently used and worn by the children, having due regard, however, for their eventual growth.
3. IT IS MUTUALLY AGREED that the party of the second part shall convey by proper Warranty Deed to the party of the first part, the North Half of the Twenty acre tract of land on which the house is situated, it being the intention that the party of the first part shall own in fee simple the dwelling and other buildings in the curtilage thereof, excepting however, the storage barn and corn crib.

4. IT IS AGREED that the party of the first part shall convey to the party of the second part by proper Warranty Deed, her interest in the remaining lands presently used and occupied by the parties hereto, this being approximately sixty acres in extent.

5. The party of the second part agrees to be responsible for extraordinary medical expenses incurred in behalf of the children.

6. The party of the second part hereby agrees to pay to the party of the first part the sum of ONE HUNDRED DOLLARS (\$100.00) in cash.

7. In agreeing to assume responsibility for extraordinary medical expenses incurred for or in behalf of the children, it is not contemplated that the party of the second part shall be responsible for or pay for the medical services rendered in connection with the present pregnancy of the party of the first part.

8. The party of the second part agrees to pay school fees, books, etc., as incurred by the children while attending a public school in Baldwin County, Alabama.

9. The parties to this instrument hereby acknowledge that the Court of Equity shall, by its order, retain jurisdiction of this cause.

WITNESS the hands and seals of the parties hereto on this the day and year first above written.

Martha Wigstrom (SEAL)

A. L. Wigstrom (SEAL)

Witnesses:

[Signature]
[Signature]

ADOLPH L. WIGSTROM,
Complainant

-vs-

MARTHA O. WIGSTROM,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

This day came MARTHA O. WIGSTROM and filed her verified petition praying that ADOLPH L. WIGSTROM be required to appear and show cause if any he have, why he should not be punished as for a contempt in regard to his failure to pay support as ordered by this Court and upon consideration of said petition it is

ORDERED, ADJUDGED and DECREED by the Court that Adolph L. Wigstrom appear before the Court at Bay Minette, Alabama, at 10 a.m., on the 28 day of August, 1954, in the Courtroom of the Circuit Court of Baldwin County, Alabama, at Bay Minette, and show cause, if any he have, why he should not be punished as for a contempt; that a copy of this petition and of this rule to show cause be served forthwith personally upon the said Adolph L. Wigstrom by the Sheriff of Baldwin County, Alabama.

Done this the 20 day of August, 1954,

Hubert M. Hester
Circuit Judge.

2741

Adolph D. Wigstrom,
Complainant

-vs-

Martha O. Wigstrom,
Respondent.

ORDER

Received 20 day of Aug 1904
and on _____ day of _____
I served a copy of the within _____
on _____
By service on _____
TAYLOR WILKINS, Sheriff
By _____

Returned 24 day of Aug 1904
Not found in my county after diligent search and
guilty.

By Geo. Humphreys
Deputy Sheriff

*Simmons
Adolph Wigstrom*

#500

FILED

NOV 2 1966

ALICE I. DICK, CLERK
REGISTER

ADOLPH L. WIGSTROM,)	
)	IN THE
Complainant-Cross Respondent,)	
)	CIRCUIT COURT OF BALDWIN
VS.)	
)	COUNTY, ALABAMA.
MARTHA WIGSTROM,)	
)	IN EQUITY.
Respondent-Cross Complainant.)	
)	NO. 2741.
)	
)	Nov. 2, 1966

MRS. MARTHA WIGSTROM, BEING FIRST DULY SWORN, TESTIFIED AS
FOLLOWS:

Examination by Mr. Wilters.

- Q. Is this Mrs. Martha Wigstrom?
- A. Yes sir.
- Q. Are you the - Were you the Respondent and Cross Complainant in an equity case No. 2741, Baldwin County, Alabama?
- A. Yes.
- Q. Did you obtain a divorce from your husband, Adolph L. Wigstrom, in February of 1952?
- A. Yes sir.
- Q. As a part of the agreement, did you and your husband enter into an agreement as to the custody of the children and the disposition of the real estate?
- A. Yes sir.
- Q. This agreement was made a part of the Court Record and the decree rendered in that case?
- A. Yes sir.
- Q. As a part of that agreement Mr. Wigstrom was to convey you the 10 acre tract of land on which the house was situated on, is that correct?
- A. Yes sir.
- Q. Did he make a conveyance of the real estate to you?

A. To a half interest init.

Q. Is this a certified copy of the deed which he made to you?

A. Yes sir

Q. Mrs. Wigstrom, this conveys a one half interest - -
withdraw that - -

MR. WILTERS: I would like to introduce this deed in
evidence as Respondent-Cross Complainant's Exhibit 1.

Next, I would like to introduce - - First, I would like
to point out to the Court that this deed provided for the
conveyance of an undivided one half interest to her - -

Now, I would like to introduce a conveyance to this land
from J. Oscar Wigstrom and Adele Wigstrom, husband and wife,
to Adolph L. Wigstrom, which conveys among other property, the
property involved in this case.

THE COURT: In otherwords, she did not have a half interest
in the property at the time?

MR. WILTERS: No, it was all in Mr. Wigstrom.

We introduce this deed as Respondent-Cross Complainant's Exhibit
2.

Q. Mrs. Wigstrom, have you been in possession of this land,
claiming the entire fee simple title to the same since 1952?

A. Yes sir.

Q. Now have you requested of your former husband that he convey
to you the other 1/2 interest in this property?

A. Yes sir.

Q. Through me?

A. Yes sir.

MR. WILTERS: For the Court's information I wrote Mr. Adolf
L. Wigstrom at Red Water Texas and his attorney replied that he had
conveyed all he was going to convey to Mrs. Wigstrom.

Q. When you entered into this agreement, which is a part of the Court record, it was the understanding and the agreement between both of you that you were to have the entire fee simple title to this 10 acre tract of land?

A. Yes sir.

Q. And that he was convey that to you?

A. Yes sir.

Q. You have lived on this land and claimed to own it entirely since February of 1952?

A. Yes sir.

Q. You have paid the taxes on this land?

A. Yes sir, from that time on.

Q. Now as a part of this decree and agreement, was he to pay you \$10.00 a week for the support and maintenance of your minor children?

A. Yes sir.

Q. How many children did you have at that time who were minors?

A. Five at the time, but one is dead now.

Q. Four living with you?

A. Yes sir.

Q. Has he paid you any of this money since this decree was entered in 1952?

A. From February to October.

Q. October of 1952?

A. Yes sir.

Q. Also he was supposed to furnish you meat, butane and electricity and clothes for the children?

A. That is what he was supposed to do, but he never did.

Q. From your information he is an able-bodied man and working?

A. Yes sir.

Q. And he is residing in Red Water Texas?

A. As far as I know he is.

Q. You have had to obtain an Attorney to Represent you in this matter?

A. Yes sir.

Q. Are you able to pay your Attorney?

A. No.

I hereby certify that the foregoing is a true and correct transcript of the testimony as taken by me, in open Court before Hon. Telfair J. Mashburn, Judge of said Court, on this the 2nd day of November, 1966.

Laurel Suenkel
Official Court Reporter

Res Cross Corn East

WARRANTY DEED

DEED BOOK 178, PAGE 397

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS: That for and in consideration of the sum of One Dollar and other good and valuable consideration to me in hand paid by Martha O. Wigstrom, does grant, bargain, sell and convey unto the said Martha O. Wigstrom, his undivided one-half interest in the following described lands situated in Baldwin County, Alabama, to-wit:

The North half of the West half of the Southwest Quarter of the Southeast Quarter (N 1/2 of W 1/2 of SW 1/4 of SE 1/4) Section Thirty-Four (34) Township five (5) South of Range three (3) East, containing ten (10) acres, more or less.

TO HAVE AND TO HOLD to the said Martha O. Wigstrom heirs and assigns forever. And I do covenant with the said Martha Wigstrom that I am seized in fee simple of the above described premises; that I have the right to sell and convey the same; that the said premises are free from all incumbrances; and that I will, and my heirs executors and administrators shall forever WARRANT AND DEFEND the same to the said heirs and assigns, against the lawful claims of all persons whomsoever.

Witness my hand and seal this 22nd day of March, 1952.

WITNESSES:

S/ Adolf L. Wigstrom L. S.

S/ Pearl L. Duncan

DEED BOOK 178, PAGE 398

I, Pearl L. Duncan, a Notary Public, in and for said County and State, hereby certify that Adolf L. Wigstrom whose name is signed to the foregoing conveyance and who is known to me, acknowledged before me, on this day, that being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this 22nd day of March A. D. 1952.

S/ Pearl L. Duncan

(Seal Affixed)

STATE OF ALABAMA

Baldwin County

PROBATE COURT

I, HARRY D'OLIVE, Judge of Probate Court in and for said State and County, hereby

certify that the within and foregoing two Pages

contain a full, true and complete copy of the Deed from Adolf L. Wigstrom to
Martha O. Wigstrom, recorded in Deed Book 178, pages

397-398

as the same appears of record in my office.

Given under my hand and seal of office, this 1 day of November, 1966.

Harry D'Olive

Judge of Probate

By

Walter
Chief Clerk

Wig

DEED WITH WARRANTY

THIS INDENTURE, made the 17th day of October, 1936 between Oscar Wigstrom and Adele Wigstrom, his wife of the first part, and Adolph L. Wigstrom of the second part: Witnesseth, that the parties of the first part in consideration of One and no/100 dollars, hereby acknowledged to have been paid the parties of the first part by the party of the second part, do grant, bargain, sell and convey unto said party of the second part his heirs and assigns, all the real property in Baldwin County, Alabama described as follows:

The west one half of the southwest quarter of the southeast quarter (W $\frac{1}{2}$ of SW $\frac{1}{4}$ of SE $\frac{1}{4}$) Section thirty four (34) township five (5) south of range three (3) east containing 20 acres more or less.

Together with all the rights and appurtenances to said described premises in anywise belonging: to have and to hold the same forever.

And Oscar Wigstrom and Adele Wigstrom, his wife for them and their heirs, the said described premises and appurtenances, will forever Warrant and Defend unto the said party of the second part, his heirs and assigns, against the lawful claims of all persons whatsoever.

Wigstrom
Adolph L.

IN WITNESS WHEREOF, The said parties of the first part have hereunto set their hand and seal the day and year above written.

Signed, sealed and delivered in the presence of
CARL L. BLOXHAM
GAYLE WILLER.

OSCAR WIGSTROM
ADELE WIGSTROM

(SEAL)
(SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, Carl L. Bloxham, Notary Public in and for said State and County, do hereby certify that Oscar Wigstrom and Adele Wigstrom, his wife, whose name are signed to the foregoing conveyance, and who are known to me, acknowledged before me, on this day that being informed of the contents of the conveyance they executed the same voluntarily on the day the same bears date.

Given under my hand (if before a foreign notary add "notarial seal") this 17th day of October, 1936.

CARL L. BLOXHAM

SEAL.

STATE OF ALABAMA
BALDWIN COUNTY

I, Carl L. Bloxham, a Notary Public in and for said State and County, do hereby certify that on the 17th day of October, 1936, came before me the within named Adele Wigstrom, known to me to be the wife of the within named Oscar Wigstrom, who being examined separate and apart from the husband, touching her signature to the within conveyance, acknowledged that she signed the same of her own free will and accord and without fear, constraints, or threats on the part of the husband.

Given under my hand (if before a foreign notary add "notarial seal") this 17th day of October, 1936.

CARL L. BLOXHAM
My Com. Exp. March 18, 1940

SEAL.

STATE OF ALABAMA
BALDWIN COUNTY

PROBATE COURT

Filed in office this 2 day of June, 1937 at 10:45 A M and duly recorded in Deed Book 62 N S pages 215-16; and I certify that \$--- cts 50 Deed tax has been paid as required by law.

G. W. Robertson, Judge of Probate

G. W. Robertson, Judge of Probate

STATE OF ALABAMA

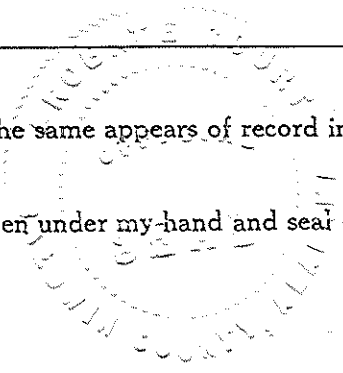
Baldwin County

PROBATE COURT

I, HARRY D'OLIVE, Judge of Probate Court in and for said State and County, hereby
certify that the within and foregoing two Pages
contain a full, true and complete copy of the Deed from Oscar and Adele Wigstrom to
Adolph L. Wigstrom, recorded in Deed Book 62, pages 215-216

as the same appears of record in my office.

Given under my hand and seal of office, this 1st day of November, 19 66.


Harry D'olive

Judge of Probate

By Jim Allen

Chief Clerk

ADOLPH L. WIGSTROM,	X	
Complainant	X	IN THE CIRCUIT COURT OF
Cross-Respondent,	X	BALDWIN COUNTY, ALABAMA
vs.	X	IN EQUITY
MARTHA WIGSTROM,	X	CASE NO. 2741
Respondent	X	
Cross-Complainant,	X	

This cause coming on to be heard, was submitted for a Decree upon the Petition of Martha Wigstrom, service by Publication upon the Complainant-Cross-Respondent, Adolph L. Wigstrom, a Motion for Decree Pro Confesso and Decree Pro Confesso and the Testimony of Martha Wigstrom, taken ore tenus and Exhibits as noted by the Register.

UPON CONSIDERATION THEREOF, the Court finds the following:

1.

That the said Adolph Wigstrom, Complainant-Cross-Respondent, has failed to comply completely with his agreement and the Decree of this Court on February 14, 1952, in that he has only conveyed to Martha Wigstrom, Respondent-Cross-Complainant, an undivided one-half interest to the 10 acre tract of land upon which their home was located. The said land is described as the North half of the West half of the Southwest Quarter of the Southeast Quarter, Section 30, Township 5 South, Range 3 East. The Court further finds that the said Adolph L. Wigstrom has refused to convey the other undivided one-half interest which still remains in him to this property.

2.

The Court further finds that Adolph L. Wigstrom, Complainant-Cross-Respondent, has failed to comply with his agreement and the Decree of this Court of February 14, 1952,

It is, therefore, ORDERED, ADJUDGED and DECREED by
the Court:

That this conveyance be made within thirty (30) days from the date of this Decree. In the event the same is not done, then it is ORDERED that the Clerk of this Court execute and deliver a Deed conveying the said undivided one-half interest to Martha Wigstrom.

ALICE J. DUCK, CLERK
REGISTERED

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

ADOLPH L. WIGSTROM

Complainant and

Cross-Respondent

No. _____

The State of Alabama,

BALDWIN County.

Circuit Court, In Equity

vs.

MARTHA WIGSTROM

Respondent and

Cross-Complainant

This the 31 day of

Aug. 1966

In this cause it being made to appear to the Clerk of this Court by the affidavit of

Martha Wigstrom

that the Defendant Adolph L. Wigstrom

is a non-resident of the State of Alabama and after reasonable effort his
residence is unknown and cannot be ascertained

and further, that, in the belief of said Affiant the Defendant is over the age of 21
years; it is, therefore, ordered that publication be made in The Baldwin Times, a newspaper pub-
lished in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring

the said Adolph L. Wigstrom

to answer or demur to the Bill of Complaint in this cause by the 30 day of
Sept, 1966, or after thirty days therefrom a decree Pro Confesso may be
taken against him.

Alice J. Cook
Register.

ADOLPH L. WIGSTROM,

X

Complainant and
Cross-Respondent,

X

IN THE CIRCUIT COURT OF

X

BALDWIN COUNTY, ALABAMA

vs.

X

IN EQUITY

MARTHA WIGSTROM,

X

CASE NO. 2741

Respondent and
Cross-Complainant, X

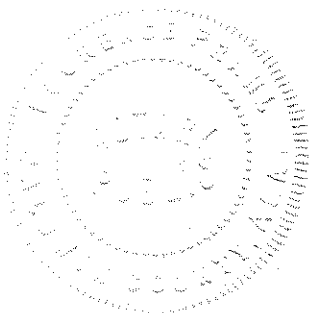
Before me, Flarence Prohle, the undersigned

authority, in and for said County, in said State, personally
appeared Martha Wigstrom, who after first being duly sworn,
deposes and says: that Adolph L. Wigstrom, the Complainant and
Cross-Respondent, in the above styled cause, is a non-resident
of the State of Alabama, and that his place of residence is
unknown, and that it cannot be ascertained after reasonable
effort; that his last known residence was Red Water, Texas,
and further that in the belief of ~~said~~ affiant, the said
Complainant and Cross-Respondent, is over the age of twenty-
one years.

Martha Wigstrom
Martha Wigstrom

Sworn to and subscribed before me this 26th day of
August, 1966.

Flarence Prohle
Notary Public,



The State of Alabama, {

Baldwin County

CIRCUIT COURT, IN EQUITY

No. _____ Term, 19__

ADOLPH L. WIGSTROM

Complainant

MARTHA WIGSTROM

Cross Respondent

Defendant

Cross Complainant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 8th day of September, 1966, in the Baldwin Times a newspaper published in Bay Minette, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the _____ day of _____ 19____, and

And it now further appearing to the Register Alice J. Duck, that the said Adolph L. Wigstrom

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant_____, ordered and decreed by the Register Alice J. Duck that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Adolph L. Wigstrom

This 1st day of November 1966

Alice J. Duck Register

ADOLPH L. WIGSTROM

Complainant

Cross-Respondent

vs.

MARTHA WIGSTROM

Respondent

Cross-Complainant

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 _____
Petition of Martha Wigstrom, Service by Publication upon Adolph
L. Wigstrom, Motion for Decree Pro Confesso, Decree Pro Confesso,
Testimony of Martha Wigstrom, taken ore tenus and Exhibits #1
and #2.

and in behalf of Defendant upon _____

WILTERS & BRANTLEY

BY: *Larry J. Wilter, Jr.*

Alice J. Shuck
Register.

FILED
NOV 2 1966
MRS. L. DICK, CLERK
REGISTER

8601—Motion for Decree Pro Confesso on Publication.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

No. _____ Term, 19__

ADOLPH L. WIGSTROM

Vs.

Complainant

CROSS RESPONDENT

MARTHA WIGSTROM

Defendant

CROSS COMPLAINANT

Motion is hereby made for a Decree Pro Confesso against Adolph L. Wigstrom

Defendant

in the annexed stated cause on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 1st day of November 1966

746 Code

FILED

NOV 1 1966

ALICE I. DICK, CLERK
REGISTER

Solicitor.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Adolph L. Wigstrom 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 Martha Wigstrom, as Cross-Complainant and against Adolph L. Wigstrom, as Cross-Respondent.

WITNESS my hand this 18th day of July, 1966.

Alice J. Luck
Register

ADOLPH L. WIGSTROM,

Complainant and
Cross-Respondent,

Vs.

MARTHA WIGSTROM,

Respondent and
Cross-Complainant

X

X

X

X

X

X

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

CASE NO. 2741

Comes now your Petitioner, Martha Wigstrom, the Respondent and Cross-Complainant in the above styled cause, and shows unto Your Honor as follows:

1.

That on the 14th day of February, 1952, this honorable court rendered a divorce decree in favor of your Petitioner and against Adolph L. Wigstrom, the Complainant and Cross-Respondent, for and on account of cruelty. As a part of the Decree of Divorce, the court ratified and confirmed an Agreement entered into by and between the parties to this action and made it a part of the Decree; which Agreement was dated the 14th day of February, 1952. The Agreement provided that the Complainant and Cross-Respondent was to convey to your Petitioner the North half of the 20 acre tract of land upon which their house was situated, in fee simple. Your Petitioner further shows unto the Court that the Complainant and Cross-Respondent did convey to her an undivided 1/2 interest to the 10 acre tract of land, but failed

to convey a full fee simple interest. Your Petitioner further alleges that the lands that were to be conveyed to her by the said Adolph L. Wigstrom is described as follows:

The North half of the West half of the Southwest quarter of the Southeast quarter of Section 34, Township 5 South, Range 3 East.

2.

Your Petitioner further shows unto the Court that the Complainant and Cross-Respondent was to pay your Petitioner \$10.00 per week for the support and maintenance of the said minor children, and in addition thereto was to furnish fresh meat, butane for the home, electricity and clothes for the children. Petitioner alleges that he has not paid to her \$10.00 per week nor has he furnished any of the necessities of life for the use of the said children.

3.

Your Petitioner further shows unto the Court that Adolph L. Wigstrom is an able bodied man who is financially able to comply with the aforesaid terms of the Decree, but that he has continuously refused to do so after being asked and that he is now presently residing in the town of Red Water, Texas.

4.

Petitioner further shows that she does not have sufficient financial means to pay a lawyer to bring this action and she has retained the firm of Wilters & Brantley for this purpose.

Wherefore premises considered, your Respondent and Cross-Complainant prays that the said Adolph L. Wigstrom be made a party to this petition that that all proper process and service be directed to him to plead, answer or demur within the time required by law.

Your Petitioner prays further that upon a final hearing of this cause, Your Honor will enter a Decree granting her relief as follows:

1. Require the said Adolph L. Wigstrom to execute and deliver a Warranty Deed to her in fee simple to the property described in the body of this Petition, as required by the Decree of February 14, 1952. Should Adolph L. Wigstrom refuse to execute such a conveyance within 30 days after the Decree, that the Clerk of the Court be authorized to make and execute a proper conveyance to her for the said property.

2. That your Honor will ascertain and determine the amount of support and maintenance that the said Adolph L. Wigstrom is in arrears and that your Honor will enter a Decree ordering and directing him to pay to her the amount determined by the Court.

3. That your Honor will ascertain and determine a reasonable Attorneys' fee to be paid the firm of Wilters & Brantley for their services in this matter.

Your Petitioner prays for such other, further or different relief as she may be entitled in the premises and that she offers to do equity.

Martha Wigstrom

Martha Wigstrom

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Martha Wigstrom, who is known to me and who after being by me first duly sworn, deposes and says: That she has read the foregoing Petition and that the facts contained therein are true and correct.

Martha Wigstrom

Martha Wigstrom

Sworn to and subscribed before me on this the 15th day of July, 1966.

James I. Wilters

Notary Public

State of Alabama at Large

WILTERS & BRANTLEY

BY:

James I. Wilters
Attorney for Petitioner

FILED
JUL 15 1966
BALDWIN COUNTY
ALABAMA

The Baldwin Times

"Baldwin's Only All County Newspaper"

BAY MINETTE, ALABAMA

J. H. FAULKNER, Publisher

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

J. H. Faulkner Jr., being duly sworn, deposes and says that he is the EDITOR of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Notice to Non-Resident

Adolph L. Wigstrom vs

Martha Wigstrom

COST STATEMENT

WORDS @ _____ cents _____ \$ 11.00
I hereby certify this is correct, due and unpaid (paid).

J. H. Faulkner Jr.
Editor.

was published in said newspaper for 4 consecutive weeks in the following issues:

Date of 1st publication September 8, 1966 Vol. 77 No. 36

Date of 2nd publication September 15, 1966 Vol. 77 No. 37

Date of 3rd publication September 22, 1966 Vol. 77 No. 38

Date of 4th publication September 29, 1966 Vol. 77 No. 39

Subscribed and sworn before the undersigned this 29 day of Sept, 1966.

Dorothy Martin
Notary Public, Baldwin County.

J. H. Faulkner Jr.
Editor.

NOTICE

TO NON-RESIDENT
The State of Alabama,
Baldwin County,
Circuit Court, In Equity
This the 31st day of Aug.
1966.

ADOLPH L. WIGSTROM
Complainant and
Cross-Respondent
vs.

MARTHA WIGSTROM
Respondent and
Cross-Complainant

In this cause it being made to appear to the Clerk of this Court by the affidavit of Martha Wigstrom that the Defendant Adolph L. Wigstrom is a non-resident of the State of Alabama and after reasonable effort his residence is unknown and cannot be ascertained and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in The Baldwin Times, a newspaper published in Bay Minette, Baldwin County, Alabama, once a week for four consecutive weeks, requiring the said Adolph L. Wigstrom to answer or demur to the Bill of Complaint in this cause by the 30th day of Sept. 1966, or after thirty days therefrom a decree Pro Confesso may be taken against him.

Alice J. Duck
Register

36-46

FILED

SEP 8 1966

CLERK
REGISTERED

ADOLPH L. WIGSTROM, X
Complainant and X IN THE CIRCUIT COURT OF
Cross-Respondent, X BALDWIN COUNTY, ALABAMA
vs. X
MARTHA WIGSTROM, X IN EQUITY
X CASE NO. 2741
Respondent and
Cross-Complainant, X

Before me, Flurence Brakle, the undersigned
authority, in and for said County, in said State, personally
appeared Martha Wigstrom, who after first being duly sworn,
deposes and says: that Adolph L. Wigstrom, the Complainant and
Cross-Respondent, in the above styled cause, is a non-resident
of the State of Alabama, and that his place of residence is
unknown, and that it cannot be ascertained after reasonable
effort; that his last known residence was Red Water, Texas,
and further that in the belief of said affiant, the said
Complainant and Cross-Respondent, is over the age of twenty-
one years.

Martha Wigstrom
Martha Wigstrom

Sworn to and subscribed before me this 26th day of
August, 1966.

Flurence Brakle
Notary Public,

FILED

AUG 31 1966

ALICE A. DICK, CLERK
REGISTER

ADOLPH L. WIGSTROM,	X	
Complainant	X	IN THE CIRCUIT COURT OF
Cross-Respondent,	X	BALDWIN COUNTY, ALABAMA
Vs.	X	IN EQUITY CASE NO. 2741
MARTHA WIGSTROM,	X	
Respondent	X	
Cross-Complainant,	X	

Personally appeared before me, the undersigned authority,
Harry J. Wilters, Jr., who after first being duly sworn, deposes
and says:

That he is the attorney of record for Martha Wigstrom in
the above styled cause and that he has personal knowledge that the
said Adolph L. Wigstrom had not complied with the order of the
Court in the above styled cause, entered on the 3rd day of November,
1966, and that the said Adolph L. Wigstrom was directed by the Court
to convey his undivided one-half interest in and to the subject
property of the suit. Now, the said Martha Wigstrom through her
attorney, requests the Register of the said Court to execute a
deed in compliance with said decree.



Attorney for Respondent, Cross-
Complainant

Sworn to and subscribed before me this 22nd day of
December, 1966.



Notary Public

FILED
Dec 22 1966
CLERK
REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Adolph L. Wigstrom 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 Martha Wigstrom, as Cross-Complainant and against Adolph L. Wigstrom, as Cross-Respondent.

WITNESS my hand this 18th day of July, 1966.

Alice J. Luck
Register

ADOLPH L. WIGSTROM,	Y	
Complainant and	Y	
Cross-Respondent,	Y	IN THE CIRCUIT COURT OF
	Y	
Vs.	Y	BALDWIN COUNTY, ALABAMA
	Y	
MARTHA WIGSTROM,	Y	IN EQUITY
	Y	
Respondent and	Y	CASE NO. 2741
Cross-Complainant	Y	

Comes now your Petitioner, Martha Wigstrom, the Respondent and Cross-Complainant in the above styled cause, and shows unto Your Honor as follows:

1.

That on the 14th day of February, 1952, this honorable court rendered a divorce decree in favor of your Petitioner and against Adolph L. Wigstrom, the Complainant and Cross-Respondent, for and on account of cruelty. As a part of the Decree of Divorce, the court ratified and confirmed an Agreement entered into by and between the parties to this action and made it a part of the Decree; which Agreement was dated the 14th day of February, 1952. The Agreement provided that the Complainant and Cross-Respondent was to convey to your Petitioner the North half of the 20 acre tract of land upon which their house was situated, in fee simple. Your Petitioner further shows unto the Court that the Complainant and Cross-Respondent did convey to her an undivided 1/2 interest to the 10 acre tract of land, but failed

to convey a full fee simple interest. Your Petitioner further alleges that the lands that were to be conveyed to her by the said Adolph L. Wigstrom is described as follows:

The North half of the West half of the Southwest quarter of the Southeast quarter of Section 34, Township 5 South, Range 3 East.

2.

Your Petitioner further shows unto the Court that the Complainant and Cross-Respondent was to pay your Petitioner \$10.00 per week for the support and maintenance of the said minor children, and in addition thereto was to furnish fresh meat, butane for the home, electricity and clothes for the children. Petitioner alleges that he has not paid to her \$10.00 per week nor has he furnished any of the necessities of life for the use of the said children.

3.

Your Petitioner further shows unto the Court that Adolph L. Wigstrom is an able bodied man who is financially able to comply with the aforesaid terms of the Decree, but that he has continuously refused to do so after being asked and that he is now presently residing in the town of Red Water, Texas.

4.

Petitioner further shows that she does not have sufficient financial means to pay a lawyer to bring this action and she has retained the firm of Wilters & Brantley for this purpose.

Wherefore premises considered, your Respondent and Cross-Complainant prays that the said Adolph L. Wigstrom be made a party to this petition that that all proper process and service be directed to him to plead, answer or demur within the time required by law.

Your Petitioner prays further that upon a final hearing of this cause, Your Honor will enter a Decree granting her relief as follows:

1. Require the said Adolph L. Wigstrom to execute and deliver a Warranty Deed to her in fee simple to the property described in the body of this Petition, as required by the Decree of February 14, 1952. Should Adolph L. Wigstrom refuse to execute such a conveyance within 30 days after the Decree, that the Clerk of the Court be authorized to make and execute a proper conveyance to her for the said property.

2. That your Honor will ascertain and determine the amount of support and maintenance that the said Adolph L. Wigstrom is in arrears and that your Honor will enter a Decree ordering and directing him to pay to her the amount determined by the Court.

3. That your Honor will ascertain and determine a reasonable Attorneys' fee to be paid the firm of Wilters & Brantley for their services in this matter.

Your Petitioner prays for such other, further or different relief as she may be entitled in the premises and that she offers to do equity.

Martha Wigstrom
Martha Wigstrom

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, personally appeared Martha Wigstrom, who is known to me and who after being by me first duly sworn, deposes and says: That she has read the foregoing Petition and that the facts contained therein are true and correct.

Martha Wigstrom
Martha Wigstrom

Sworn to and subscribed before me on this the 15th day of July, 1966.

Henry J. Wilters, Jr.
Notary Public State of Alabama at Large

WILTERS & BRANTLEY

BY: Henry J. Wilters, Jr.
Attorney for Petitioner

FILED

JUL 18 1966

ALICE I. DUCK, CLERK
REGISTER

no. 2741

ALICE J. DUCK, Circuit Clerk

BALDWIN COUNTY

BAY MINETTE, ALA.

36507

CERTIFIED

No. 665582

MAIL

CERTIFIED MAIL

For Delivery Only

To Person To Whom Addressed

Return Receipt Requested

RECEIVED
Unclassified
Unknown
Insufficient
Moved
No return in this envelope
Do not return in this envelope
POSTAGE DUE 2 CENTS

Adolph L. Wigstrom

Red Water, Texas





POST OFFICE BOX 1000
BAY MINETTE, ALA. 36507

Case No. 2741

Edolph L. Weythorn VS. Martha Weythorn

Filed 7-18-66

Service (^{Personal} Registered Mail) "Refused"

ALICE J. DUCK,

Clerk - Register