

CIRCUIT COURT, IN EQUITY

vs.

**RECORDED**

No. \_\_\_\_\_ Page \_\_\_\_\_

**The State of Alabama**

**BALDWIN COUNTY**

**In Circuit Court, In Equity**

HELEN GREENE

Complainant.

vs.

JAMES A. GREENE

Respondent.

**DIVORCE DECREE**

**FILED**

AUG 28 1950

ALICE J. DUCK, Register

AGREEMENT

STATE OF ALABAMA)  
BALDWIN COUNTY )

THIS AGREEMENT, made this 9th day of August, 1950, between JAMES A. GREENE, hereinafter referred to as HUSBAND, and HELEN GREENE, hereinafter referred to as WIFE.

WITNESSETH:

WHEREAS, the said parties were lawfully married on the 26th day of September, 1945 at Mobile, Alabama, and your child, HELEN ANN GREENE, about four years of age was born of this marriage, and

WHEREAS, the parties have been separated, since 1948 and have not lived together since the date of separation, and

WHEREAS, the parties now desire to adjust finally between themselves all of their property rights and claims against each other respectfully;

NOW THEREFORE, in consideration of the premises and for other valuable considerations between them passing, the parties do hereby agree as follows:

1.

It is agreed by the parties hereto that said Wife shall have the sole and absolute custody, control and care of the said child and Husband agrees to pay the sum of Twenty (\$20.00) Dollars for her support during the month of September and beginning with the first of October agrees to pay to Flora Gilbert, grandmother, for the support of said child the sum of Thirty (\$30.00) Dollars each month thereafter.

There is no property to be divided.

2.

It is agreed by the parties hereto that the Wife hereby releases said Husband from any and all claims for her future maintenance and support.

3.

It is stipulated and agreed by the parties hereto that this Agreement may be incorporated in and become a part of any decree of divorce and shall be enforceable independent of any such decree.

4.

No provision in this Agreement shall be interpreted or hold to operate

against the parties hereto seeking a divorce from the bonds of matrimony in any jurisdiction where they may have valid grounds therefor.

IN WITNESS WHEREOF the parties have hereunto set their hands and seals in duplicate this 9th day of August, 1950.

James A. Greene (SEAL)  
Husband

Helene Greene (SEAL)  
Wife

Witnessed by:

[Signature]  
as to both signatures.

STATE OF ALABAMA }  
BALDWIN COUNTY }

Before me the undersigned authority personally appeared the parties to this instrument, who being informed of the contents thereof voluntarily executed same in my presence the date put therein.

[Signature]  
Notary Public, Baldwin County, Alabama.

HELEN GREENE

Complainant

Vs

JAMES A. GREENE

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, 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, marriage, child 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 Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

James A. Greene

STATE OF ALABAMA  
BALDWIN COUNTY

I, CLB, a Notary Public, in and for said County, in said State, hereby certify that James A. Greene, 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 seal on this the 7 day of August, 1950.

CLB  
Notary Public, Baldwin County, Alabama.

RECORDED

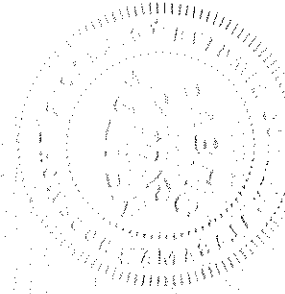
HELEN GREENE

Complainant

Vs

JAMES A. GREENE

Respondent



ANSWER AND WAIVER

FILED

AUG 22 1950

ALICE J. DUCK, Register

From the law office of  
C. LeNoir Thompson  
Bay Minette, Alabama

STATE OF ALABAMA  
BALDWIN COUNTY

You are hereby commanded to summon JAMES A. GREENE, 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 HELEN GREENE, as Complainant, and against JAMES A. GREENE, as Respondent.

WITNESS my hand this \_\_\_\_ day of August, 1950.

Register

HELEN GREENE

Complainant

Vs

JAMES A. GREENE

Respondent

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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

Your Complainant, Helen Greene, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent married in Mobile, Alabama, on September 26, 1945, and lived together as husband and wife in Baldwin County, Alabama until on to-wit, December 19th, 1948.

3.

Complainant avers that 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 anyway recognized each other as husband and wife.

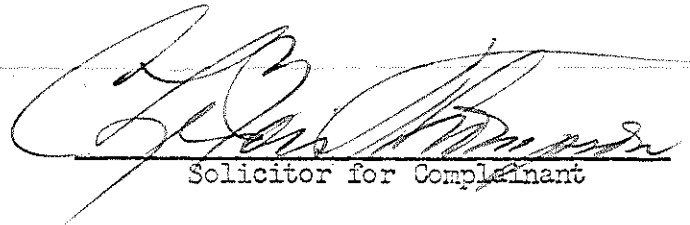
4.

That there was born between the marriage of your Complainant and the Respondent one child; Helen Ann Greene, age three years, and that the Mother of said child is a suitable, fit and proper person to have the care, custody and control.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said JAMES A. GREENE, party Respondent, to this bill of complaint requiring him 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 further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between your Complainant and Respondent.

That the care, custody and control of the said child be awarded to the Complainant, and that upon a final hearing of this cause, that your Complainant's mother be awarded as maintenance for the child named herein the sum of Thirty (\$30.00) Dollars per month and such other further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for Complainant



RECORDED

702532

HELEN GREENE

Complainant

Vs

JAMES A. GREENE

Respondent

SUMMONS AND COMPLAINT

FILED

AUG 22 1950

ALICE J. DUCK, Register

From the law office of  
C. LeNoir Thompson  
Bay Minette, Alabama

HELEN GREENE

VS.

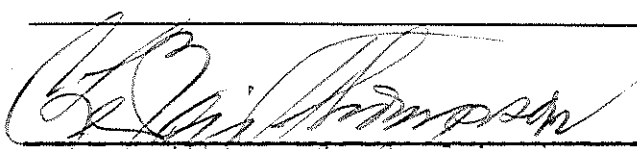
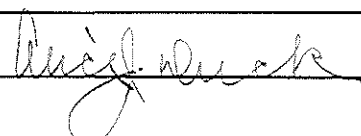
JAMES A. GREENE

THE STATE OF ALABAMA  
Baldwin CountyIN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, \_\_\_\_\_

and oral depositions of Helen Greene and Flora Gilbert  
and agreement as to property settlement and maintenance  
and support of child.

and in behalf of Defendant upon \_\_\_\_\_ answer and waiver

  
Attorney for Complainant  
Register.

**RECORDED**

No. 2532

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

HELEN GREENIE

vs.

JAMES A. GREENIE

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of ....., 194

**FILED**

**AUG**

**22 1950**

**Register.**

**ALICE J. DUCK, Register**  
Printed By The Baldwin Times

**THE STATE OF ALABAMA**  
Baldwin County.Circuit Court of Baldwin County, Alabama  
(In Equity)HELEN GREENE

Complainant

VS.

JAMES A. GREENE

Respondent

I, Peggy Guy  
as Register and Commissioner in the above styled cause  
have called and caused to come before me Helen Greene and Flora Gilbert

witnesses named in the Requirement for Oral Examination, on the 11th day of August  
1945, at the office of C. LeNoir Thompson  
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 Helen Greene and Flora Gilbert  
doth depose and say as follows:

That my name is Helen Greene. The Respondent James A. Greene and I were married September 26, 1945 at Mobile, Alabama, and lived together as husband and wife until December 19th, 1948. The Respondent and I both are over the age of twenty-one and are residents of Baldwin County, Alabama, and have been more than two years next preceding. There was born of our marriage one child, Helen Ann Greene, a little less than four years of age. I have had the care, custody and control of Helen Ann, since she was born, and wish to continue to have her care, custody and control. I need as contribution for her maintenance and support \$20.00 for the month of September and \$30.00 each month thereafter. The Respondent and I have not lived together, since he abandoned me, December 19th, 1948, without cause on my part. It is agreeable with me for the maintenance paid by him for our child to be paid directly to my Mother, Flora Gilbert, who aids me in looking after my child.

Helen Greene

That my name is Mrs. Flora Gilbert, I am the mother of Helen Greene, I know both parties to this cause and both are over the age of twenty-one. They were married in September, 1945 at Mobile and lived together as husband and wife until December 19th, 1948. There is one child as fruits of this marriage; she is Helen Ann Greene, not quite four years old and I am helping the mother look after her. They stay in my home, when the mother hasn't had the money, I have looked after her. I have agreed when necessary to look after her, if it takes more than \$30.00 a month to maintain her. Helen and James have not lived together as husband and wife for more than a year and during this time Bay Minette has been Helen's home and James has been at Bay Minette on weekends. I know of no cause she gave him for abandoning her.

Mrs Flora Gilbert

ORAL EXAMINATION.

I, Peggy Guy, 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 C. LeNoir Thompson 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 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 11th day of August, 1945.

Peggy Guy

(L. S.)

NO. 2532 PAGE

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

HELEN GREENIE

vs. Complainant

JAMES A. GREENIE

Respondent.

Oral Deposition

Filed 8-21, 1945

Cliff LeNoir, Register.  
Recorded in

Vol. \_\_\_\_\_ Page \_\_\_\_\_  
Record \_\_\_\_\_  
Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: PEGGY GUY

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 \_\_\_\_\_

Helen Greene and Flora Gilbert

as witnesses in behalf of Helen Greene in a cause pending in our Circuit Court in Baldwin County, of said State, wherein \_\_\_\_\_

Helen Greene, Complainant

and \_\_\_\_\_

James A. Greene Respondent

on oath, to be by you administered, upon Peggy Guy to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 14<sup>th</sup> day of August, 1945.

Wm. J. Duck

Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No. 2535

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

HELEN GREENE

Complainant

vs.

JAMES A. GREENE

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

PEGGY GUY

WITNESSES:

HELEN GREENE

FLORA GILBERT