

Circuit Court, In Equity

vs.

No. 2525 - Page \_\_\_\_\_

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

Anna Archer

Complainant

vs.

Thomas Archer

Respondent

**DIVORCE DECREE**

FILED  
JAN 16 1951  
ALICE J. DUCK, Register

ANNA ARCHER

COMPLAINANT

VS

THOMAS ARCHER

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

The Respondent admits the allegations as to ages, residents, marriage and the child, but denies all allegations as to abandonment and demands strict proof of the same.

The Respondents admits that TWENTY (\$ 20.00) DOLLARS per week is a reasonable amount to be paid by him toward the maintenance and support of the child.

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

Thomas Archer

STATE OF ALABAMA  
BALDWIN COUNTY

I, J. L. Lacy, a Notary Public, in and for said County, in said State, hereby certify that Thomas Archer, 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 said conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 14 day of January, 1951.

J. L. Lacy  
Notary Public, Baldwin County, Alabama

RECORDED

ANNA ARCHER  
COMPLAINANT  
VS  
THOMAS ARCHER  
RESPONDENT

ANSWER AND WAIVER

FILED  
JAN 16 1951  
ALICE L. BUCK, Register

**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Anna Archer

Complainant

VS.

Thomas Archer

Respondent

I, Evelyn Watts,

as Register and Commissioner

have called and caused to come before me Anna Archer and Mrs. W. J. Archer

witnesses named in the Requirement for Oral Examination, on the 15 day of January

1945, at the office of Hubert M. Hall,

in Bay Minette,

Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said Anna Archer and

Mrs. W. J. Archer

doth depose and say as follows:

My name is Anna Archer. I am the Complainant in the above styled cause. The Respondent and I are both over twenty-one years of age and residents of Baldwin County, Alabama.

The Respondent and I married at Lucedale, Mississippi, on May 7, 1949. We lived together as husband and wife in Baldwin County, Alabama, until January 5, 1950, when the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time.

The Respondent and I have one child, a boy Timothy Thomas Archer thirteen months old. The child has been with me all of his life and I am, as his mother, the suitable, fit and proper person to have his care, custody and control.

The Respondent is an able bodied man fully capable of caring and providing for the child. In my opinion \$20.00 per week is a reasonable amount to be paid by the Respondent for the maintenance and support of the child. I feel that with \$20.00 per week I will be in position to properly care for the child.

*Anna Archer*

I am and have been for many years personally acquainted with the Complainant and the Respondent in this cause. I have had occasion to see each of them for the past year and know that they have not lived together as husband and wife since the First of January, 1950. They have one child now thirteen months old. The Complainant, the mother of the child, is the proper person to have the care and control of the child. I believe that \$20.00 per week is a reasonable amount to be paid by the Respondent to the Complainant for the maintenance and support of the child.

*Mrs. W. J. Archer*

ORAL EXAMINATION.

I, Evelyn Watts, 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 and Hubert M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness 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 envelope to the Register of said Court.

Given under my hand and seal, this 15th day of January, 194 51

Evelyn Watts (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Anna Archer

vs. Complainant

Thomas Archer

Respondent.

Oral Deposition

Filed 1-15, 1947

Leif J. Leach, Register.  
Recorded in \_\_\_\_\_

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

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Evelyn Watts

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 Anna Archer and Mrs. W. J. Archer

as witnesses in behalf of complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Anna Archer

and Thomas Archer, Complainant

Respondent

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

Witness 15<sup>th</sup> day of January, 1945

W. J. Duck

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 2595 ~

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Anna Archer

Complainant

vs.

Thomas Archer

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

Mrs. W. J. Archer



STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons THOMAS ARCHER, 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 ANNA ARCHER as Complainant and against THOMAS ARCHER, as Respondent.

WITNESS my hand this the 14 day of January, 1951.

Register

ANNA ARCHER

COMPLAINANT

VS

THOMAS ARCHER

RESPONDENT

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

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

Your Complainant, Anna Archer, respectfully represents unto your Honor and this Honorable Court as follows:

1.

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

2.

That Your Complainant and the Respondent married at Lucedale, Mississippi, on May 7, 1949, and lived together as husband and wife in Baldwin County, Alabama, until January 5, 1950.

3.

That on January 5, 1950, the Respondent voluntarily abandoned the bed and board of your complainant and has remained away voluntarily and continuously since that time.

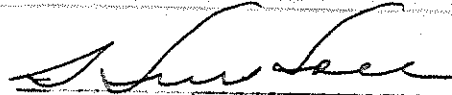
4.

That there was born to the marriage between your Complainant and the Respondent a child Timothy Thomas Archer, thirteen months old and who has all of his life been with your Complainant, who is a suitable, fit

and proper person to have the care, custody and control; that the Respondent is an able bodied man fully capable of caring and providing for the said child; that TWENTY (\$20.00) DOLLARS per week is a reasonable amount to be paid by the Respondent to the Complainant toward the maintenance and support of the minor child, Timothy Thomas Archer.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Thomas Archer, party Respondent to this cause of action, 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.

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 she be granted such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

  
Solicitor for the Complainant