

(2831)

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Eva Lucille Broad, Complainant

vs.

Clarence B. Broad, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confession on~~ Answer and Waiver 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 Eva Lucille Broad is forever divorced from the said Clarence B. Broad for and on account of Voluntary abandonment.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant be and she is hereby awarded the care, custody and control of the said Minor child, Ronald Keith Broad.

~~IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant's maiden name is hereby restored which is: Eva Lucille Tucker~~ J.A.M.

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 Eva Lucille Broad the Complainant pay the cost herein to be taxed, for which execution may issue.

This 3rd day of July, 1952.

Jessie G. Marbleberry, 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. 2831

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The State of Alabama  
Baldwin County

In Circuit Court, In Equity

Eva Lucille Broad

Complainant

vs.

Clarence B. Broad

Respondent

**DIVORCE DECREE**

**FILED**

JUL 3 1952

ALICE J. DUCK, Register

THE STATE OF ALABAMA

IN THE CIRCUIT COURT  
IN EQUITYBaldwin CountyNo. 2831Eva Lucille Broad, Complainant

vs.

Clarence B. Broad, Respondent

I, Alice J. Duck, Register of said Court, acting as commissioner pursuant to the annexed commission issued out of said Court in the above styled cause, have called and caused to come before me the following witnesses named in said commission, on the \_\_\_\_\_ day of July, 1952, at \_\_\_\_\_, in Bay Minette, Baldwin County, Alabama, and having first sworn the said witnesses to speak the truth, the whole truth and nothing but the truth, the said witnesses severally deposed and testified, as follows:

Deposition of the witness Eva Lucille Broad:

My name is Eva Lucille Broad. I am the Complainant and Clarence B. Broad is the Respondent in this cause. We are both bona fide resident citizens of Baldwin County, Alabama, and have so resided for more than one year next preceding the time of the filing of my Bill of Complaint. I am over the age of twenty years and the Respondent is over the age of twenty-one years. The Respondent and I were lawfully married on, to-wit, the 29th day of March, 1950, at Lucedale, Mississippi. There was born to the union of our marriage one child, Ronald Keith Broad, a boy now about eighteen months of age. He is presently living with me in the home of my mother, Mrs. Vashtie Yarbrough, in the Town of Bay Minette, Alabama. I am financially able to support and maintain the said child and deem myself a suitable person to be entrusted with his custody and control. The Respondent did voluntarily abandon my bed and board more than one year preceding the time of the filing of my Bill of Complaint in this cause, since this abandonment I have not lived with the Respondent as his wife nor recognized him in any way as my husband.

E. Lucille Broad  
Eva Lucille Broad

Deposition of witness Vashtie Yarbrough:

My name is Mrs. Vashtie Yarbrough. I am the mother of Eva Lucille Broad, the Complainant in this cause. I know both the Complainant and Respondent and know that the Complainant is now over the age of twenty years and that the Respondent is over twenty-one years of age. Eva Lucille Broad and Clarence B. Broad are both bona fide resident citizens of Baldwin County, Alabama, and have so resided for more than one year next preceding the time of the filing of her Bill of Complaint. I know that the Complainant and Respondent were married to each other in Lucedale, Mississippi, on, to-wit, the 29th day of March 1950. There was born to this union one boy child named Ronald Keith Broad. He is now about eighteen months of age. He and his mother are presently residing in my home and will continue to do so if Eva Lucille Broad is granted the custody of the said child. I maintain a good Christian home in which to rear the child and I know that Eva Lucille Broad is financially able to support and maintain her said child. Clarence B. Broad did voluntarily abandon the bed and board of my daughter, Eva Lucille Broad, more than one year next preceding the time of the filing of her Bill of Complaint and since this abandonment she has not lived with the Respondent and his wife nor in any way recognized him as such.

Vashtie Yarbrough  
Mrs. Vashtie Yarbrough

CERTIFICATE

I, Alice J. Rensick, Register of said Court, acting as commissioner, hereby certify that the foregoing depositions on oral examination were taken down in writing by me in the form of a narrative and read over to the said witnesses who signed the same in the presence of Alice J. Rensick at the time and place hereinabove mentioned; that I have personal knowledge of the identity of said witnesses or proof was 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 in any manner interested in the result thereof.

I enclose said depositions, together with said commission, in an envelope directed to the Register of said Court and have placed the same on file in my office.

I hereby certify that the fees for acting as commissioner amount to \$ 3.00 and the further sum of \$        for necessary travel in taking such testimony.

And I further certify that the following named witnesses claimed and proved before me the compensation in fees and mileage as indicated below:

_____	, fee \$ _____	, mileage \$ _____	, total \$ _____
_____	, fee \$ _____	, mileage \$ _____	, total \$ _____
_____	, fee \$ _____	, mileage \$ _____	, total \$ _____
_____	, fee \$ _____	, mileage \$ _____	, total \$ _____

Given under my hand and seal, this 3rd day of July, 1952

Alice J. Rensick (L. S.)  
Register Commissioner

No. 2831

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT IN EQUITY

Oral Depositions Before Register  
of Witnesses:

Eva Lucille Broad

Mrs Veshtie Yarbrough

Eva Lucille Broad

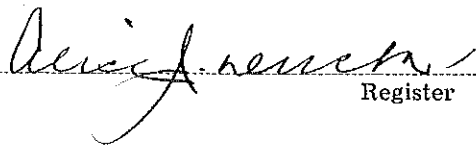
Complainant

vs.

Clarence B. Broad

Respondent

Filed this 3rd day of July 1952

  
Register

Eva Lucille Broad

vs.

Clarence B. Broad

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, \_\_\_\_\_  
oral depositions of Eva Lucille Broad and Vashtie Yarbrough

and in behalf of Defendant upon Answer and waiver

*Thelbert M Brantley*  
attorney for Complaint

*W. J. Lenoir*

Register.

No. 2831.....

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Eva Lucille Broad

vs.

Clarence B. Broad

NOTE OF TESTIMONY

Filed in Open Court this 3rd

day of July, 1942

Register.

Printed By The Baldwin Times

BILL OF COMPLAINT

EVA LUCILLE BROAD,	Y	
Complainant,	Y	IN THE CIRCUIT COURT OF
VS.	Y	BALDWIN COUNTY, ALABAMA.
CLARENCE B. BROAD,	Y	IN EQUITY
Respondent.	Y	CASE NO. _____.

TO THE HONORABLE TELFAIR J. WASHBURN, JR., JUDGE OF THE TWENTY-EIGHTH JUDICIAL CIRCUIT OF THE STATE OF ALABAMA, IN EQUITY SITTING:

Comes now the Complainant, Eva Lucille Broad, humbly complaining of the Respondent, Clarence B. Broad, in a matter of divorce and represents and shows unto Your Honor as follows:

F I R S T

That both the Complainant and Respondent are bona fide resident citizens of the County of Baldwin, State of Alabama, and have so resided for more than one year immediately preceding the date of the filing of this Bill of Complaint; that the Complainant is over the age of twenty years and that the Respondent is over the age of twenty-one years.

S E C O N D

That the Complainant and Respondent were married to each other at Lucedale, Mississippi, on, to-wit, the 29th day of March, 1950.

T H I R D

That Complainant represents and shows unto Your Honor that there was born to the union of Complainant and Respondent one child, Ronald Keith Broad, a boy now about eighteen months of age. That the child is now in the custody of the Complainant who lives in the home of her mother, Mrs. Vashtie Yarbrough, in the Town of Bay Minette, Alabama, that the Complainant is a suitable person to be entrusted with the control and custody of the said child; that she lives in a good Christian home and is able to support and maintain the said child in a manner suitable to its station in life. That she and the Respondent have entered into an agreement relative to the support and custody of said child and prays that this Honorable Court will take cognizance of said agreement between the parties.



F O U R T H

That Respondent did more than one year next preceding the time of the filing of this Bill of Complaint voluntarily abandon the bed and board of the Complainant and said abandonment has been voluntary and continuous to this date.

PRAYER FOR PROCESS

To the end that equity may be had in the premises, the Complainant prays that Clarence B. Broad be made a party Respondent to this Bill of Complaint and that service be perfected on him and that he be required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Premises considered Complainant prays that on a final hearing of this cause that your Honor will make and enter a decree forever divorcing her from the said Clarence B. Broad for and on account of his voluntary abandonment and that she will be awarded a full and absolute divorce. Complainant prays that in and by virtue of said decree she will be awarded the right to again contract marriage should she so desire. Complainant prays that in and by virtue of said decree she will be awarded custody of the minor child born to the union of said parties, namely, Ronald Keith Broad. Complainant prays that she will be restored her maiden name which is: Eva Lucille Tuck.

Complainant prays all other, further and different relief to which she may be entitled, premises considered.

  
SOLICITOR FOR COMPLAINANT

AGREEMENT

STATE OF ALABAMA     X

BALDWIN COUNTY     X

KNOW ALL MEN BY THESE PRESENTS: That Whereas, the undersigned, Clarence B. Broad, hereinafter called the husband, and Eva Lucille Broad, hereinafter called the wife have separated and divorce proceedings have been commenced in the Circuit Court of Baldwin County, Alabama, by the said Eva Lucille Broad against the said Clarence B. Broad;

And Whereas, there was born to the union of the parties one child, Ronald Keith Broad, a boy now about eighteen months of age;

Whereas, it is the desire of the parties to make provisions concerning the support and maintenance of the said child and provisions for his custody.

NOW THEREFORE, it is agreed by and between the parties that the said Eva Lucille Broad is a suitable and proper person to be entrusted with the care and custody of the said child and it is agreed by and between the parties that she shall have custody of the child from this time forward, subject to the rights of the said Clarence B. Broad to visit the child at reasonable times and places, and it is further agreed that Eva Lucille Broad is both physically and financially able to support and maintain the child and does hereby agree that she will henceforth support and continue to support the said child until he reaches his majority.

We respectfully request the Circuit Court of Baldwin County, Alabama, to take cognizance of this our agreement and to award the custody of the child in accordance with this agreement.

In Witness Whereof, we have hereunto set our hands and seals in duplicate on this the 26 day of July, 1952.

C. B. Broad (SEAL)  
Clarence B. Broad

WITNESSES:

E. Lucille Broad (SEAL)  
Eva Lucille Broad

WITNESSES :

[Signature]  
[Signature]

AGREEMENT **RECORDED**

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY

CASE NO. 2831.

-----  
EVA LUCILLE BROAD,

Complainant,

VS.

CLARENCE B. BROAD,

Respondent  
-----

FILED July 2, 1952.

Alice J. Duck  
REGISTER

The State of Alabama, Baldwin County

CIRCUIT COURT IN EQUITY

Eva Lucille Broad

Complainant

VS.

Clarence B. Broad

Respondent

Comes respondent and for answer to the bill of complaint in the above-styled cause denies the allegations thereof.

Respondent accepts service of the notice of the filing of the bill of complaint; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consent that the same may be taken and the cause submitted for final decree.

C. B. Broad

Respondent

State of Alabama

County of Baldwin

I, the undersigned authority, do hereby certify that Clarence B. Broad

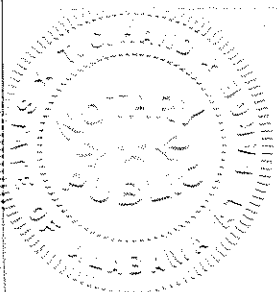
whose name is signed to the foregoing answer and waiver, and who is known to me, acknowledged before me on this day, that, being informed of the content of the answer and waiver Clarence B. Broad executed the same voluntarily.

Given under my hand, this 2 day of July, 1952

[Signature]

Notary Public State of Ala.  
at Large.

MY COMMISSION AS A NOTARY PUBLIC  
EXPIRES 21 OF Jan 1956



2831

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

**RECORDED**

**The State of Alabama**

Baldwin

County.

**IN CIRCUIT COURT, IN EQUITY**

Eva Lucille Broad

vs.

Complainant

Clarence B. Broad

Respondent

**RESPONDENT'S ANSWER AND  
WAIVER**

**FILED**

JUL 2 1952

ALICE J. DUCK, Register

