



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

The State of Alabama  
Baldwin County

In Circuit Court, In Equity

Nancy Murline Keith

Complainant

vs.

Edward Henry Keith

Respondent

**DIVORCE DECREE**

FILED

JUL 14 1952

ALICE J. DUCK, Register

NANCY MURLINE KEITH,                    |  
                                  Complainant,   |       IN THE CIRCUIT COURT OF  
-vs-                                       |       BALDWIN COUNTY, ALABAMA  
EDWARD HENRY KEITH,                    |       IN EQUITY  
                                  Respondent.   |

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT  
COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your complainant, Nancy Murline Keith, respectfully repre-  
sents and shows unto your Honor:-

1. That your complainant is over the age of twenty-one  
years and is a resident of said County and State, and has been a  
bona fide resident of said State for more than one year next prece-  
ding the filing of this Bill of Complaint; that Edward Henry Keith  
is over the age of twenty-one years and is a resident of Foley,  
Baldwin County, Alabama.

2. That your complainant and the respondent were law-  
fully married on August 27, 1949.

3. The complainant further avers and alleges that the  
said respondent has, since here said marriage with him, become  
addicted to habitual drunkenness, and that said habit has continued  
to the filing of this bill.

4. Complainant further shows that there has been born of  
this marriage two children, namely, Livea Arbelle Keith, Age 2 and  
Tony Keith, Age Two Months. Which said children are in the care,  
custody and control of the complainant. Complainant averes that  
the respondent is financially able to pay the sum of Fifteen Dollars  
(\$15.00) per week for support and maintenance of the two minor chil-  
dren.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED: Your complainant prays that  
Edward Henry Keith be made a party defendant to this cause by the  
usual process of this Honorable Court, requiring him to plead,  
answer or demur within the time and under penalties prescribed by  
the rules of this Court and the statutes in such cases made and pro-  
vided; that upon a final hearing of this cause, that your complain-  
ant be granted a divorce from said respondent. And that she be

granted custody and control of the two minor children with rights of visitation to the respondent and that she be granted and awarded the sum of Seven Dollars and 50/100 cents (\$7.50) per week for the maintenance and support of each child. Should your complainant be mistaken in the relief prayed for that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound she will ever pray.

  
Solicitor for Complainant

Marcy Marline Keith  
Complainant

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Frances Saffold

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 Nancy Murline Keith and  
Levia Buckelew

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

Nancy Murline Keith is

Complainant  
and

Edward Henry Keith is

Respondent  
on oath, to be by you administered, upon

to take and certify the deposition s of the witness s and return the same to our Court, with all  
convenient speed, under your hand.

Witness 9th day of July, 195 2.

Alvin J. Murak

Register.

Commissioner's Fee, \$

Witness' Fees, \$

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

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

**CIRCUIT COURT**

Nancy Murline Keith

Complainant—

**vs.**

Edward Henry Keith

Defendant—

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER

Frances Saffold

WITNESSES:

Nancy Murline Keith and

Levia Buckelew

**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Nancy Murline Keith Complainant

VS.

Edward Henry Keith Respondent

I, Frances Saffold

as Register and Commissioner in Chancery

have called and caused to come before me Nancy Murline Keith and

Levia Buckelew

witnesses named in the Requirement for Oral Examination, on the 9th day of July,  
1952, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said Witnesses to speak the  
truth, the whole truth, and nothing but the truth, the said Nancy Murline Keith and  
Levia Buckelew doth depose and say as follows:

My name is Nancy Murline Keith. I am over the age of twenty-one years and have been a resident citizen of Baldwin County, Alabama for over three years. I married Edward Henry Keith on August 27, 1949 and we have two children, Livea Arbell Keith, Age 2 and Tony Keith, Age two months. My husband never drank before our marriage but has begun drinking constantly sometime ago. I now consider him a habitual drunkard and in addition he is very mean and abusive to me when he is drinking which is almost all of the time. Things had gotten so bad with his drinking that we have not lived together as husband and wife for about ten months. My husband is quite capable of earning a living and I believe that I should be granted custody and control of our two children and that he should pay Seven Dollars and 50/100 cents (\$7.50) per week for the support and maintenance of each of them.

Nancy Murline Keith

My name is Levia Buckelew. I am over the age of twenty-one years and a resident citizen of Baldwin County, Alabama. I am personally acquainted with Nancy Murline Keith and Edward Henry Keith. He has since their marriage in August, of 1949 become a habitual drunkard. I also know him to be mean and abusive and know that they have not lived together as man and wife for about ten months. They have two Children, Livea Arbell Keith, Age 2 years and Tony Keith, Age two months.

Levia Buckelew

ORAL EXAMINATION.

I, Frances Saffold, 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 each other

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 9th day of July, 1942

Frances Saffold (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Nancy Murline Keith

vs. Complainant

Edward Henry Keith  
Respondent.

Oral Deposition

Filed 19, 1942

Frances Saffold, Register.  
Recorded in \_\_\_\_\_

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

\_\_\_\_\_, Register.



NANCY MURLINE KEITH,

Complainant, )

-vs-

EDWARD HENRY KEITH,

Respondent. )

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; 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 consents that the same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. He admits the allegations contained in paragraph 1 of said bill of complaint.
2. He admits the allegations contained in paragraph 2 of said bill of complaint.
3. He denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof thereof.
4. He admits the allegations in paragraph 4 of said bill of complaint.

Edward Henry Keith  
Respondent.

Sworn to and subscribed to before me, a Notary Public on this the 7 day of July, 1952.

Alvin N. Sanders  
Notary Public, Baldwin County  
State of Alabama

Notary Public, Baldwin County, Ala.  
My commission expires March 19, 1956.  
Bonded by Employers Liability Assurance  
Corporation

TO THE HONORABLE SENATE

AND HOUSE OF REPRESENTATIVES

REPORT OF THE SELECT COMMITTEE ON THE

ALLEGED VIOLATIONS OF THE

CONSTITUTIONAL RIGHTS OF

THE PEOPLE OF THE UNITED STATES

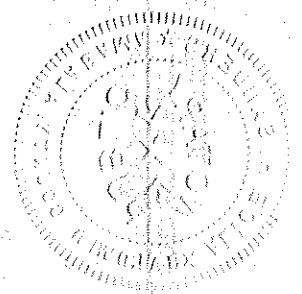
IN THE MATTER OF THE

ALLEGED

VIOLATIONS OF THE

FILED  
JUL 9 1952  
ALICE J. DUCK, Register

RECORDED



Nancy Murline Keith,  
Complainant

vs.

Edward Henry Keith,  
Respondent

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,  
and testimony of Nancy Murline Keith and Levia Buckelew

and in behalf of Defendant upon answer and waiver

*[Signature]*  
Solicitor for Complainant

*[Signature]*  
Register.

No. ....

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

Nancy Murline Keith,

Complainant

vs.

Edward Henry Keith,

Respondent

NOTE OF TESTIMONY

Filed in Open Court this 9th

day of July, 1942

Deice J. H. H. H.  
Register

Printed By The Baldwin Times

2834