

4078

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

HAZEL LAVERN RAYBORN

Complainant

vs.

WALTER JAMES RAYBORN

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Personal Service 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

HAZEL LAVERN RAYBORN is forever divorced from the said WALTER JAMES RAYBORN for and on account of

HABITUAL DRUNKENNESS

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 four minor children, John Thomas Rayborn, Patricia Ann Rayborn and Cecil Dwight Rayborn and Walter James Rayborn Jr, with the right of the respondent to visit the children at reasonable times and for reasonable periods.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the court that the respondent pay the complainant the sum of Forty (\$40.00) Dollars a week for the support and maintenance of the said children.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the court that the respondent pay to John V. Duck the sum of Seventy Five (\$75.00) as a solicitor's fee in this cause.

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 futher ordered that the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon payment of the cost of this suit.

It is further ordered that Walter James Rayborn the respondent pay the cost herein to be taxed, for which executed may issue.

This 20 day of August 1957

Hubert M Hall
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
AUG 20 1957
ALICE A. BUCK, Register

HAZEL LAVERN RAYBORN I
 I IN THE CIRCUIT COURT OF
 I
VS. I BALDWIN COUNTY, ALABAMA
 I
WALTER JAMES RAYBORN I IN EQUITY
 I NO. _____
 I

C O M P L A I N T

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA. IN EQUITY:

Your Complainant, Hazel Lavern Rayborn respectfully shows unto
your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of twenty-one years, and
is a bona fide resident of Baldwin County, Alabama; that the Res-
pondent, Walter James Rayborn, is over the age of twenty-one years
and is a bona fide resident of Baldwin County, Alabama.

2.

That the Complainant and the Respondent were married at Bay
Minette, Alabama, on the 30th day of August, 1945, and have lived
together as husband and wife in Fairhope, Alabama, until on to-wit:
July 4, 1957.

3.

That the Respondent has become addicted to habitual drunkenness
after the marriage, and as a result of his habitual drunkenness has
withdrawn any support for the Complainant and their four children,
which caused the Complianant to leave him.

4.

That there was born to the marriage between the Complainant
and the Respondent, four children, John Thomas Rayborn, age 8,
Patricia Ann Rayborn, age 6, Walter James Rayborn, Jr., age 4.,
and Cecil Dwight Rayborn, age 2; who are now and have been all of
their lives, living with their mother, the Complainant; that your
Complainant is a suitable, fit and proper person to have their care,
custody and control.

5.

That your Complainant has no separate estate or funds out of
which to provide her maintainence or support or for the support of
their minor children; that the Respondent is an able bodied man

capable of supporting the Complainant and their four minor children. That the Respondent is now working and making over ONE HUNDRED DOLLARS per week.

That your Complainant further avers that she has no funds out of which to pay a Solicitor for his services for the prosecution of this cause, and that the Respondent is an able bodied man capable of paying the services heretofore mentioned.

PRAYER FOR PROCESS AND RELIEF

WEHEREFORE. THE PREMISES CONSIDERED. Your Complainant prays that the Respondent, Walter James Rayborn, be made a party Respondent to this cause by the usual writ of process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and under the Statutes in such cases made and provided.

Complainant further prays that upon a final hearing of this cause that your Honor will grant unto your Complainant an absolute divorce from said Respondent.

Complainant further prays that she be awarded the permanent care custody and control of the minor children, John Thomas Rayborn, Patricia Ann Rayborn, Walter James Rayborn, Jr., and Cecil Dwight Rayborn; that the Court will make all necessary orders and decrees as may be proper, fixing a sufficient amount of money to be paid by the Respondent, to the Complainant for her support and for the support for the four minor children; and that the Court will fix a reasonable amount for the Complainant's Solicitor for representing her in this cause, and ordering the Respondent to pay same.

Complainant prays for all such other further and different relief to which she may be entitled and as in duty bound she will ever pray.

Walter James Rayborn
Complainant

John V. Duck
Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,

Baldwin County.

Circuit Court, Baldwin County

No.-----

-----TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WALTER JAMES RAYBORN

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-----

WALTER JAMES RAYBORN-----, Defendant-----

by-----

HAZEL LAVERN RAYBORN-----, Plaintiff-----

Witness my hand this

9

day of

July

1957

Walter J. Rayborn-----, Clerk

No. 4078

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

HAZEL LAVERN RAYBORN

Plaintiffs

vs.

WALTER JAMES RAYBORN

Defendants

Summons and Complaint

Filed 7-9 1957

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

7-9 1957

Sheriff

I have executed this summons

this July 17 1957

by leaving a copy with

Walter James Rayborn

Sheriff claims 70 miles at

Ten Cents per mile Total \$ 7.00

BY Taylor Wilkins Sheriff
DEPUTY SHERIFF

Taylor Wilkins Sheriff
Carole Ann Deputy Sheriff

Tailings

THE STATE OF ALABAMA, }
Baldwin County }

No. _____ Circuit Court, In Equity.

HAZEL LAVERN RAYBORN

Complainant...

Vs.

WALTER JAMES RAYBORN

Defendant....

Motion is hereby made for a Decree Pro Confesso against Walter James Rayborn

Defendant....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant... has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 19th day of August 1957

John V. Duck
Solicitor.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

HAZEL LAVERN RAYBORN

Vs.

WALTER JAMES RAYBORN

Motion for Decree Pro Confesso on
Personal Service

Filed 8 - 17 19 57

W. J. Rayborn
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

CIRCUIT COURT COMPLAINT

Printed by the Baldwin Times, Bay Minette, Alabama.

HAZEL LAVERN RAYBORN
Complainant,
Vs.
WALTER JAMES RAYBORN
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____

Walter James Rayborn

by the Sheriff of Baldwin County, on the 17th day of July,
1947

And it further appears to the Register, that that the said Walter James Rayborn

_____ the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of John V. Duck Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said Walter James Rayborn

This 17 day of August, 194 57

John V. Duck
Register.

No. _____

**CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY**

HAZEL LAVERN RAYBORN

Complainant,

Vs.

WALTER JAMES RAYBORN

Respondent.

**DECREE PRO CONFESSO ON
PERSONAL SERVICE.**

Issued this 17 day of Aug 57
194 .

Alvin J. [Signature]
Register.

HAZEL LAVERN RAYBORN

COMPLAINANT

VS.

WALTER JAMES RAYBORN

RESPONDENT

¶

)¶

¶

¶

¶

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

RULE TO SHOW CAUSE

This day came Hazel Lavern Rayborn and filed her verified petition for an order upon Walter James Rayborn to show cause why he should not be punished as for a contempt, a true and correct copy of said verified petition being hereto attached, and upon consideration of the same,

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED BY THE COURT:

1. That the said Walter James Rayborn do appear before the Court in his own proper person at 10 A M. on 3rd day of October, 1957, in the Court Room of the Circuit Court of Baldwin County, Alabama, at Bay Minette, Alabama, then and there to show cause, if any he have, why he should not be punished as for a contempt of court for and on account of the matters and things set out in the verified petition of the said Hazel Lavern Rayborn.

2. That the Sheriff of Baldwin County do forthwith serve upon the said Walter James Rayborn a copy of this order and the attached petition, and make due return thereof.

3. Do on this the 14 day of September, 1957.

Hubert M. Hill
Judge of the Circuit Court

HAZEL LAVERN RAYBORN

COMPLAINANT

VS.

WALTER JAMES RAYBORN

RESPONDENT

RULE TO SHOW CAUSE

HAZEL LAVERN RAYBORN	1	
COMPLAINANT	1	IN THE CIRCUIT COURT OF
VS.	1	BALDWIN COUNTY, ALABAMA
WALTER JAMES RAYBORN	1	IN EQUITY
RESPONDENT	1	NO. _____

TO THE HONORABLE HUBERT M. HALL, JUDGE OF CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Now comes your Petitioner, Hazel Lavern Rayborn, and respectfully shows unto this Honorable Court that on, to-wit, the 20th day of August, 1957, this Honorable Court rendered a decree divorcing your Petitioner from the Respondent, Walter James Rayborn.

That in said decree the Court ordered the Respondent, Walter James Rayborn, to pay to your Petitioner, as and for the support of the minor children of their marriage, the sum of \$40.00 weekly; the court further ordered the Respondent, Walter James Rayborn, to pay to John V. Duck, the sum of \$75.00 as a Solicitor's fee for the prosecution of the divorce on behalf of the Petitioner; the court further ordered the Respondent, Walter James Rayborn, to pay the court costs that were taxed in the said divorce proceeding; that the said Walter James Rayborn, though having the financial ability to comply with the requirements of the said decree, has wilfully refused and failed to pay to your Petitioner the sum directed or to pay the solicitor's fee as directed by this honorable court; that his payments have not been in accordance with the said decree; that the said Walter James Rayborn is, at the time of this petition, in arrear for the support of the minor children of their marriage in the sum of \$80.00 and is in arrear for the Solicitor's fee in the sum of \$75.00.

Your Petitioner further avers that she has employed the services of John V. Duck, Attorney at Law, Fairhope, Alabama, for the purpose of prosecuting these proceedings; and that she is without funds to pay the reasonable costs for her Solicitor's fees in this matter.

THE PREMISES CONSIDERED, your Petitioner Hazel Lavern Rayborn, respectfully prays that this Court make and enter an order and decree requiring the said Walter James Rayborn to be and appear be-

fore the Honorable Court at such time and place as Your Honor may direct, to show cause, if any he have, why he should not be punished as for a contempt. And petitioner further prays that on the final hearing of these proceedings your Honor may direct that Walter James Rayborn pay a reasonable Solicitor's fee for these proceedings. Petitioner further prays for such other, further and different relief to which she may be entitled, and as in duty bound she will ever pray.

Hazel Lavern Rayborn
HAZEL LAVERN RAYBORN

Sworn to and subscribed before me this the 11th day of September, 1957.

John V. Dick
Notary Public, Baldwin County, Alabama

4078

ved 14 day of Sept 1957
on 2 day of Oct 1957
ved a copy of the within Petition
Walter James Rayborn
ervice on _____

TAYLOR WILKINS, Sheriff
By Edliger Stashers D. S.

Fairhope, Ala.

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Edliger Stashers
DEPUTY SHERIFF

HAZEL LAVERN RAYBRON
COMPLAINANT
VS.
WALTER JAMES RAYBORN
RESPONDENT

VERIFIED PETITION PRAYING
FOR CONTEMPT CITATION

FILED

SEP 14 1957

ALICE J. BECK, Register

In the presence of
Walter James Rayborn
Fairhope

4078

ved 14 day of Sept 1957
on 2 day of Oct 1957
ved a copy of the within Petition
Walter James Rayborn
ervice on _____

TAYLOR WILKINS, Sheriff
By Edlidge Steadman D. S.

Fairhope, Ala.

Sheriff claims 70 miles at
Ten Cents per mile Total \$ 7.00
TAYLOR WILKINS, Sheriff
BY Edlidge Steadman
DEPUTY SHERIFF

HAZEL LAVERN RAYBORN

COMPLAINANT

VS.

WALTER JAMES RAYBORN

RESPONDENT

VERIFIED PETITION PRAYING

FOR CONTEMPT CITATION

FILED

SEP 14 1957

ALICE J. DUCK, Register

To be served on
Walter James Rayborn
Fairhope

HAZEL LAVERN RAYBORN	¶	
COMPLAINANT	¶	IN THE CIRCUIT COURT OF
VS.	¶	BALDWIN COUNTY, ALABAMA
WALTER JAMES RAYBORN	¶	IN EQUITY
RESPONDENT	¶	NO. _____

This cause now coming on to be heard before the Court, is submitted for decision upon the petition for a rule to show cause, and upon the testimony taken orally, and upon the consideration of the same the Court is of the opinion that the said Walter James Rayborn possesses the means and has willfully and contemptuously refused to pay to Hazel Lavern Rayborn the support heretofore decreed in her favor, as and for support of the minor children of her marriage to the said Walter James Rayborn, and the sum as decreed as a Solicitor's fee to her Attorney, as decreed by the decree of this court, dated August 20, 1957,

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED BY THE COURT:

1. That the said Walter James Rayborn is in contempt of the Court.
2. That as punishment for his said contempt he be confined in the jail of Baldwin County until he has complied with the terms of said decree or be otherwise discharged by due process of law, and the Register of this Court is ordered and directed to forthwith issue a writ directed to any sheriff of the state of Alabama commanding him to take the said Walter James Rayborn into his custody.

It is further ordered that the said Walter James Rayborn be taxed with all costs accrued by reason of said petition and this writ.

Done this the _____ day of _____, 1957.

CIRCUIT JUDGE

HAZEL LAVERN RAYBORN

vs.

WALTER JAMES RAYBORN

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,

~~THE Testimony of Hazel Lavern Rayborn, Dalton Jones and~~

~~E. M. Bailey~~

and in behalf of Defendant upon ~~Decree Pro Confesso on Personal Service~~

John V. Duck

Wiley Duck

Register.

No

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

HAZEL LAVERN RAYBORN

VS.

WALTER JAMES RAYBORN

Note of Testimony

Filed in Open Court this

FILED

day of AUG 20 1957, 19

ALICE J. BUCK, Register

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: OPHELIA J. QUINLEY

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Hazel Lavern Rayborn, Dalton Jones and E. M. Bailey.

a witness in behalf of Hazel Lavern Rayborn
Circuit Court in Baldwin County, of said State, wherein

in a cause pending in our
Hazel Lavern Rayborn and

, Complainant

and

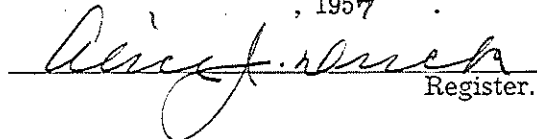
Walter James Rayborn

Respondent

on oath, to be by you administered, upon Hazel Lavern Rayborn, Dalton Jones & E. M. Bailey.
to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness this 13 day of August

, 1957


Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

HAZEL LAVERN RAYBORN

VS. Complainant

WALTER JAMES RAYBORN

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

Hazel Lavern Rayborn

Dalton Jones

E. M. Bailey

THE STATE OF ALABAMA }
Baldwin County }

Circuit Court of Baldwin County, Alabama.
(In Equity)

HAZEL LAVERN RAYBORN

COMPLAINANT

VS.

WALTER JAMES RAYBORN

RESPONDENT

I, OPHELIA J. QUINLEY

as Register and Commissioner

have called and caused to come before me Hazel Lavern Rayborn, Dalton Jones
and E. M. Bailey.

witness es named in the requirement for Oral Examination, on the 19th day of August
19457, at the office of John V. Duck

in Fairhope, Alabama, and having first sworn said witness es to speak the
truth, the whole truth, and nothing but the truth, the said witnesses

doth depose and say as follows:

My name is Hazel Lavern Rayborn. I am the complainant in the above styled cause. I am over the age of 21 years and am a resident of Baldwin County, Alabama and have been for 1 year, next, preceeding the filing of this bill of complaint.

Walter James Rayborn is over the age of 21 years and is a resident of Baldwin County, Alabama.

The respondent, Walter James Rayborn and I were married at Bay-Minette Alabama on the 30th day of August, 1945 and have lived together as husband and wife until July 4th, 1957.

Since our marriage in 1945 the respondent has become addicted to habitual drunkenness and as a result of his drinking has withdrawn almost entirely any support for myself and our four children.

The respondent at the time of our marriage drank to some extent but as time went on his drinking habits have steadily increased, until at the time of our seperation he was drinking continiously. As a result of his drinking he has been in trouble financially, constantly and has refused to support me and our children.

There were born to us during our 12 years of marriage 4 children, John Thomas Rayborn, age 8, Patrica Ann Rayborn, age 6, Walter James Rayborn Jr, age 4 and Cecil Dwight Rayborn, age 2; who are now and have been all of their lives living with me and I am a suitable, fit and proper person to have the permanant care, custody and control of said children.

I have no money or seperate estate out of which to provide for my support of the 4 minor children; nor do I have the funds to pay Mr. John V. Duck, whom I have retained as my solicitor in this cause. The respondent, Walter James Rayborn is an able bodied man and is now employed by Joe Schneider & Son, Inc. and averages a salary of over \$100 per week. I will need at least \$40.00 per week to properly care for myself and the heretofore mentioned minor children.

Hazel Lavern Rayborn

Testimony of Dalton Jones.

My name is Dalton Jones. I am a brother to the complainant in the above styled cause. I have known both the complainant and the respondent through out their married life. The respondent has always drank to some extent but here recently his drinking has been almost continous.

As a result of his drinking I know to my own personal knowledge that he has almost entirely withdrawn any support for the complainant and their 4 children.

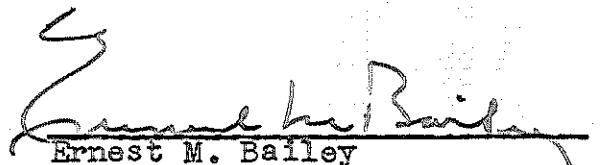
The complainant is a suitable and proper person to have the permanent care, custody and control of the minor children.

I believe that it would be a benifit to all parties for this divorce to be granted.


Dalton Jones

Testimony of E. M. Bailey, Attorney at Law, Fairhope Alabama.

My name is Ernest M. Bailey. I am a duly licensed attorney in the State of Alabama, Baldwin County. I am now in the active practice of law in Fairhope, Baldwin County, Alabama and in my course of practice I have handled many divorce cases and I beleive that \$75.00 is a reasonable fee for the services rendered by John V. Duck in this cause.


Ernest M. Bailey

I, OPHELIA J. QUINLEY as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and JOHN V. DUCK at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ES or had proof 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 19th day of August 194 57.

Ophelia J. Quinley (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

Filed _____, 194 _____

FILED

Register.

AUG 20 1957

ALBERT J. DUCK, Register

Vol. _____ Page _____

Register

HAZEL LAVERN RAYBORN,
Complainant
VERSUS
WALTER JAMES RAYBORN,
Respondent

PETITION FOR MODIFICATION OF DECREE

Comes the Respondent in the above styled cause and shows unto this Honorable Court that on, to-wit, the 20th day of August, 1957 a decree of divorce was granted to the Complainant in said cause, wherein this Court ordered, adjudged and decreed as follows:

1. That the Complainant was awarded care, custody and control of the minor children born of the marriage between your Complainant and the Respondent, and the Respondent was granted the right of reasonable visitation privileges.
2. That the Respondent should pay to the Complainant as and for support of the said minor children the sum of Forty (\$40.00) Dollars per week.
3. That the Respondent should pay to John V. Duck, Solicitor for the Complainant, the sum of Seventy Five (\$75.00) Dollars as a reasonable Attorney's fee in said cause.
4. That the Respondent should pay the cost of Court in said cause.

The Respondent further shows unto the Court that subject to the rendition of the final decree in this cause, the Complainant and Respondent have entered into an agreement, a copy of which agreement is attached herewith and made a part hereof, wherein the parties have agreed to certain modifications of said decree in this:

1. The Respondent shall pay to the Complainant as and for support of their minor children the sum of Twenty Five (\$25.00) Dollars per week.
2. That the Complainant shall pay as and for a reasonable Attorney's fee to her Solicitor of record, John V. Duck, any and all amount in excess of Fifty (\$50.00) Dollars.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Respondent prays that the above named Hazel Lavern Rayborn be made a party to this cause by the usual Writ or process of this Honorable Court requiring her to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in this cause made and provided; that upon a final hearing of this cause that Your Honor will issue an order modifying the decree heretofore issued by this Honorable Court and will order and decree that the Respondent shall pay to the Complainant the sum of Twenty Five (\$25.00) Dollars per week as and for support of their minor children; that the Respondent shall pay to John V. Duck, Attorney at Law, the sum of Fifty (\$50.00) Dollars as and for a reasonable Solicitor's fee in this cause. Should Your Respondent be mistaken in the relief prayed for, that there be granted to him such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.


WALTER JAMES RAYBORN
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

It is further agreed by and between the parties hereto that

HAZEL LAVERN RAYBORN vs. WALTER JAMES RAYBORN
STIPULATED AGREEMENT

this Stipulated Agreement may be used by either party who may file a Bill to modify the decree of divorce heretofore issued in this cause, the parties agree that this Stipulation and Agreement and all of its terms may be submitted to the Court for its approval and the Complainant hereto does accept service of said petition and waives further service of the same. The Complainant also waives notice of taking of testimony in said cause, notice of submission of said cause and agrees that this Stipulation and Agreement may be used as testimony and the cause submitted without further notice to her.

It is further agreed by and between the parties to this Stipulated Agreement that neither party hereto shall in any way harass, threaten, intimidate, or otherwise act in any way so as to embarrass or humiliate the other party.


HAZEL LAVERN RAYBORN, COMPLAINANT

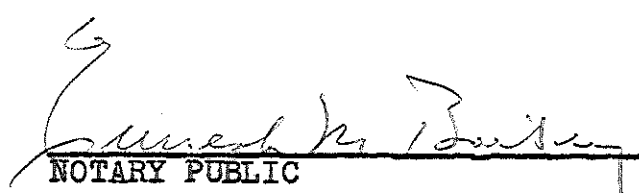

WALTER JAMES RAYBORN, RESPONDENT

STATE OF ALABAMA)
)
BALDWIN COUNTY)

I, the undersigned notary public in and for said state and county, do hereby certify that Hazel Lavern Rayborn and Walter James Rayborn, whose names are signed to the foregoing instrument and who are known to me, acknowledged before me on this day that, being informed of the contents of the instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal this 20th day of September, 1957.

My commission expires


NOTARY PUBLIC

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

1. That the Complainant was awarded care, custody and control of the minor children born of the marriage between your Complainant and the Respondent, and the Respondent was granted the right of reasonable visitation privileges.

3. That the Respondent should pay to John V. Duck, Solicitor for the Complainant, the sum of Seventy Five (\$75.00) Dollars as a reasonable Attorney's fee in said cause.

AND, WHEREAS, the Respondent has filed a Bill to modify said decree, now this cause coming on to be heard was submitted upon the Stipulated Agreement entered into by and between the parties on the 20th day of September, 1957, in lieu of a reference, as to care, custody and control and support as and for the minor children of their marriage and as to the payment of a reasonable attorney's fee in said cause, and the same being known and understood, the Court is of the opinion that the Agreement should be ratified,

1. That the Complainant shall have the care, custody and control of the children named in the Complaint, with the right of the Respondent to visit them at reasonable and proper times and so long as the Respondent shall not be drinking nor under the influence of alcoholic beverages.

2. That the Respondent should pay to the said Complainant the sum of Twenty Five (\$25.00) Dollars as and for the support of

the said children.

3. That the Respondent shall pay the sum of Fifty (\$50.00) Dollars to John V. Duck, the Complainant's Solicitor of record, as and for a reasonable attorney's fee, and the Complainant shall pay to the said John V. Duck all sums due in excess of that amount.

4. That the Respondent agrees to pay all costs of Court involved in these proceedings.

DONE AND ORDERED this the 21st day of September, 1957.

Robert M. Hall
CIRCUIT JUDGE