

The State of Alabama,  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

MAE BELL COLEMAN

Complainant

VS.

JOHN D. COLEMAN

Respondent

I, Vera Hough

as Register and Commissioner

have called and caused to come before me

MAE BELL COLEMAN

witness named in the Requirement for Oral Examination, on the 15th Day of August

19\_\_\_\_, at the office of

Vera Hough

in Foley, Alabama, and having first sworn said Witness to speak the

truth, the whole truth, and nothing but the truth, the said Mae Bell Coleman

doth depose and say as follows:

My

My name is Mae Bell Coleman. I am over the age of 21 years. I am a resident of Baldwin County, Alabama. I have been a bona fide resident of Baldwin County, Alabama for the past 10 years. John D. Coleman is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

I was lawfully married to John D. Coleman on July 23, 1942, at Bay Minette, Alabama, and we have two minor children. Joe Coleman, who is 11 years old and Johnny Coleman who is 9 years old.

John D. Coleman voluntarily abandoned me over a year ago. We have not lived together nor in anyway recognized each other as husband and wife since he abandoned me.

I have entered into an agreement with John D. Coleman, the agreement marked Exhibit "A" is made a part of my testimony. The agreement provides that I have the custody and control of our children and that John D. Coleman will pay to me for support and maintenance for the two children the sum of \$40.00 per month.

*Mae Belle Coleman*

ORAL EXAMINATION

I, Vera Houch, 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...and read over to them...and...they...signed the same in the presence of myself

Vera Houch

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 August, 1957.

Vera C. Houch (L. S.)

No. 4106 Page

The State of Alabama  
Baldwin County.

In Circuit Court, In Equity

vs. Complainant

Respondent

Oral Deposition

Filed 5/19

FILED

AUG 25 1957, Register

ALICE J. DUCK, Registered in

Record

Vol. Page, Register

Register

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Vera Hough

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 Mae Bell Coleman

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

Mae Belle Coleman

Complainant

and John D. Coleman

Respondent

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

Witness 15th day of August, 1957

Wesley J. ... Register.

Commissioner's Fee, \$

Witness' Fees, \$

4606

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

**THE STATE OF ALABAMA  
Baldwin County**

**CIRCUIT COURT**

MAE BELL COLEMAN

Complainant

VS.

JOHN D. COLEMAN

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

VERA HOUGH

WITNESSES:

Commissioner and witnesses have examined the deponent and sworn to the truth of the contents of the foregoing deposition and the deponent has sworn to the truth of the contents of the foregoing deposition and the deponent has sworn to the truth of the contents of the foregoing deposition.

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_ 19\_\_\_\_ at \_\_\_\_\_ Alabama.

Notary Public

Notary Public

1901

Commissioner of the Circuit Court

Notary Public

MAE BELL COLEMAN

Complainant

vs.

JOHN D. COLEMAN

Respondent

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

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

Respondent's Answer and waiver

Commission to take Depositions

Oral Deposition of the Complainant

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

*Arthur C. Epperson*  
Attorney for Complainant

*W. J. Johnson*  
Register.

No. 4106

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

MAE BELL COLEMAN

Complainant

vs.

JOHN D. COLEMAN

Respondent

NOTE OF TESTIMONY

Filed in Open Court this  
day of \_\_\_\_\_, 194

**FILED**  
AUG 15 1957  
AUG 15 1957  
Register.

Printed by the Baldwin Times Register

*Handwritten notes:*  
Mae Bell Coleman  
John D. Coleman

MAE BELLE COLEMAN )  
Complainant )  
VS. )  
JOHN D. COLEMAN )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

This cause coming on to be heard was submitted upon Bill of Complaint, answer and waiver of Respondent 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 MAE BELLE COLEMAN is forever divorced from the said JOHN D. COLEMAN.

Upon consideration of the written agreement entered into between the Complainant and Respondent touching the custody of the minor children of the marriage and alimony for support of said minor children, it is further ORDERED, ADJUDGED and DECREED by the Court as follows:

A: That said written agreement is hereby ratified and approved, and the care, custody and control of the said minor children of the marriage, namely, Joe Coleman and Johnny Coleman, is awarded to the mother, the Complainant.

B: That JOHN D. COLEMAN pay over to MAE BELL COLEMAN the sum of forty dollars (\$40.00) per month as alimony for support and maintenance of said minor children, said payments to begin immediately and be payable on or before the 5th day of each month.

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 MAE BELLE COLEMAN the Complainant pay the cost herein to be taxed, for which execution may issue.

This 15 day of August, 1957.

  
Hubert M. Hall  
Judge Circuit Court, In Equity.

I, Alice J. Duck, 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 August, 1957

Register of Circuit Court, In Equity

FILED

AUG 15 1957

ALICE J. DUCK, Register



MAE BELL COLEMAN )  
Complainant )  
VS )  
JOHN D. COLEMAN )  
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 this cause; waives notice of the filing of interrogatories in this 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 complaint heretofore filed in this cause the respondent says:

1. He admits the allegations in paragraph one of the said Bill of Complaint.
2. He admits the allegations of paragraph two of the said Bill of Complaint.
3. He denies each and every material allegation contained in paragraph three of the said Bill of Complaint and requires strict proof.
4. The respondent for answer to paragraph four avers that said agreement is a just and fair agreement and prays the Court that should the Court grant the complainant a divorce, that said agreement be incorporated into the decree and made a part thereof.

John D. Coleman  
RESPONDENT

Mrs Hunter Myers  
Witness

Mrs Edith Holloway  
Witness

4106

Ans.

**FILED**

AUG 15 1957

ALICE J. DUCK, Register

MAE BELLE COLEMAN )  
Complainant )  
VS )  
JOHN D. COLEMAN )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

To the Honorable Judge of the Circuit Court of Baldwin County,  
Alabama, Sitting in Equity:

Your complainant Mae Belle Coleman represents and  
shows unto your Honor:

1. That complainant is over the age of twenty-one years  
and is a resident of Baldwin County, Alabama and has been a bona-  
fied resident of said State for more than one year next preceding  
the filing of this bill of Complaint; that John D. Coleman is over  
the age of twenty-one years and is a resident of Baldwin County,  
Alabama.

2. That your complainant and respondent were lawfully  
married on July 23, 1942, at Bay Minette, Alabama, and of this  
marriage there are two minor children, Joe Coleman, age 11 years  
and Johnny Coleman, age 9 years.

3. Complainant further avers that said respondent volun-  
tarily 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 any~~  
way recognized each other as husband and wife.

4. That complainant and respondent have entered into an  
agreement with reference to the custody, control, support and main-  
tenance of the said minor children, a copy of which is hereto attach-  
ed as Exhibit "A", and made a part thereof; and by the terms of which  
agreement the complainant shall have the care, control and custody  
of said minor children and the respondent shall pay to the complain-  
ant \$40.00 a month for the support and maintenance of the said  
minor children.

Complainant avers that this is a reasonable, just and  
proper agreement and prays the Court that in the event a decree of  
divorce is given in this cause that the Court will decree that the  
parties keep and abide by the terms of said agreement.

The premises considered, your complainant makes the said  
John D. Coleman a party respondent to this bill of complaint and in  
order that complainant may have the relief herein prayed for, may it  
please your Honor to cause the State's writ of subpoena to be issued,  
directed to the said John D. Coleman, commanding him to answer, plead  
or demur to this bill of complaint within the time required by law;  
and that on a final hearing of this cause that your Honor will enter  
a decree divorcing your complainant from said respondent; and that  
Your Honor will grant such other, further and different relief as  
unto your Honor may seem just and proper, and your complainant will  
ever pray.

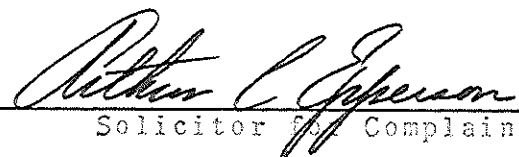
  
Solicitor for Complainant

Exhibit A

STATE OF ALABAMA

BALDWIN COUNTY

THIS AGREEMENT made and entered into this the seventh day of August, 1957, by and between Mae Belle Coleman, hereinafter referred to as the party of the first part, and John D. Coleman, hereinafter referred to as the party of the second part,

WITNESSETH:

WHEREAS, the parties hereto have been husband and wife since July 23, 1942, and as a result of such union have two minor children, Joe Coleman, age 11 years and Johnny Coleman, age 9 years, and,

WHEREAS, the parties have been separated and living apart for over a year and have definitely concluded that it is impractical for them to live together as man and wife; and,

WHEREAS, the party of the first part is contemplating bringing an action for a divorce and it is the desire to settle the matter of the care, control, support and maintenance of the said minor children of the marriage without litigation,

NOW THEREFORE, in consideration thereof, and of the mutual agreements hereinafter made, they have mutually agreed to the following terms and conditions:

1. That the care, control and custody of the said minor children be in the mother, the party of the first part, with rights of visitations of reasonable times and places in the father, the party of the second part, and that the party of the second part shall pay to the party of the first part \$40.00 a month for the support and maintenance of the said minor children.

2. That in the event the party of the first part insists on her express determination to file a suit for divorce against the party of the second part, it shall be thoroughly understood that the party of the second part denies and expects to continue to deny that the party of the first part is in any way entitled to a divorce, and in the event that the court, upon hearing should decide that the party of the first part is entitled to a divorce, then it is agreed and understood that this agreement and all of its terms shall be submitted to the Court for its approval and shall not be executed until and unless the Court does approve the same.

This agreement has been made and executed by the parties hereto in good faith on the day and date hereinabove set forth, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.

Mrs. Hunter Myers  
Witness

Mae Belle Coleman  
Party of the First part

Mrs. Edith Holloway  
Witness

John D. Coleman  
Party of the Second Part

H106

OK  
1/15/57  
H

FILED

AUG 15 1957

ALICE J. DUCK, Registrar

*Handwritten signature*

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