

4220

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

WILLIE F. MARSHALL

Complainant

vs.

HARRIET J. MARSHALL

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ Waiver and Answer 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

WILLIE F. MARSHALL

is forever divorced from the

said HARRIET J. MARSHALL

for and on account of

"ABANDONMENT"

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 payment of the cost of this suit.

It is further ordered that WILLIE F. MARSHALL the Complainant pay the cost herein to be taxed, for which executed may issue.

This 4 day of April 1958

Subert 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 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

APR 4 1958

ALICE J. DICK, Register

4228

INSTRUCTIONS TO DELIVERING EMPLOYEE

DELIVER ONLY TO ADDRESSEE (20¢ additional)

SHOW ADDRESS WHERE DELIVERED IN ITEM 4 BELOW (31¢ additional)

RECEIPT

Received from the Postmaster the Registered, Certified, or Insured Article, the number of which appears on the face of this return receipt.

1. SIGNATURE OR NAME OF ADDRESSEE

X Mrs. Harriet J. Marshall

2. SIGNATURE OF ADDRESSEE'S AGENT (Agent should enter addressee's name in item 1 above)

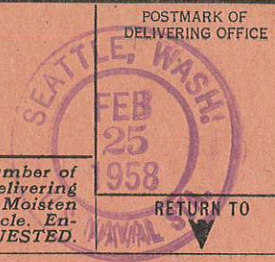
3. DELIVERY DATE

FEB 25 1958, 19

4.

SEATTLE
 8 30 PM
 1958
 WASH.

REGISTERED
 MAR 3 1958
 REGISTER



INSTRUCTIONS.—Show name, address and number of article below. Complete "Instructions to Delivering Employee" on other side, when applicable. Moisten gummed ends and securely attach to back of article. Endorse front of article RETURN RECEIPT REQUESTED.

POD Form 381, Dec. 1955

REGISTERED NO.	NAME OF SENDER
	Alice J. Duck, Register
CERTIFIED NO.	STREET AND NO. OR P. O. BOX
134304	Box 239
INSURED NO.	CITY, ZONE, AND STATE
	Bay Minette, Alabama

ci 6-71548-3

WILLIE F. MARSHALL

vs.

HARRIET J. MARSHALL

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,
Waiver and Answer, and Testimony of WILLIE F. MARSHALL.

and in behalf of Defendant upon Waiver and Answer

Harriet J. Marshall

Rebecca J. Newcomb
Register.

No. -----

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

WILLIE F. MARSHALL

VS.

HARRIET J. MARSHALL

Note of Testimony

Filed in Open Court this 4 -----

day of Apr -----, 1958

Arice J. W. W. R.
Register.

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

WILLIE F. MARSHALL

Complainant

VS.

HARRIET J. MARSHALL

Respondent

DORIS BROWN

I,

as ~~Register and~~ Commissioner

have called and caused to come before me WILLIE F. MARSHALL

witness named in the Requirement for Oral Examination, on the 4TH day of April

1958, at the office of Telfair J. Mashburn

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

truth, the whole truth, and nothing but the truth, the said Willie F. Marshall

doth depose and say as follows: "My name is Willie F. Marshall. I am the complainant in this cause and I am over the age of twenty-one years. I am a bona fide resident citizen of Baldwin County, Alabama, residing at Spanish Fort, and have been for more than two years next preceding the filing of this bill of complaint in this cause. Harriet J. Marshall is over the age of twenty-one years, and is a non-resident of the State of Alabama, presently residing at 4251 Greenwood Avenue, Apartment B, Seattle, Washington. I was married to the respondent, Harriet J. Marshall, on 24th day of December, 1952, at Vancouver, Washington. We lived together as husband and wife until about the 20th day of February, 1957. On that date, she abandoned my bed and board, (I am in the U. S. Air Force and was stationed in Maine at the time), and returned to Seattle, Washington, and since that time we have not lived together as husband and wife. We had had trouble prior to that time, and I know that we will never again be able to live together as husband wife. We do not have any children." Further deponent says not.

Willie F Marshall

ORAL EXAMINATION

I, DORIS BROWN, 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 him and he signed the same in the presence of myself and Telfair J. Mashburn

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness... or had proof 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 4th day of April, 1958

Doris Brown (L. S.)

No. _____ Page _____

The State of Alabama
Baldwin County.

In Circuit Court, In Equity

WILLIE F. MARSHALL

vs. **Complainant**

HARRIET J. MARSHALL

Respondent

Oral Deposition

Filed April 4, 1958

Recorded in George S. Muel, Register

Record

Vol. _____

Page _____

, Register

.....
WILLIE F. MARSHALL
Complainant,
VS.
.....
HARRIET J. MARSHALL
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from
Bay Minette....., in the County of Baldwin.....
Alabama, the place of trial of said cause, to-wit: WILLIE F. MARSHALL.....
.....
.....
.....;

2. That said complainant requires an oral examination of said witnesses before a commissioner appointed by the Register of this Court.

J. J. Masberry.....
Solicitor for Complainant.

NOTE:

Complainant suggests the name of..... DORIS BROWN.....
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

J. J. Masberry.....
Solicitor for Complainant.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: DORIS BROWN

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

WILLIE F. MARSHALL

a witness in behalf of WILLIE F. MARSHALL in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

WILLIE F. MARSHALL

is the , Complainant
and

HARRIET J. MARSHALL

is the Respondent

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

Witness 4th day of April

, 1958

Alice J. New...
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

WILLIE F. MARSHALL

VS. Complainant

HARRIET J. MARSHALL

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

DORIS BROWN

WITNESSES:

WILLIE F. MARSHALL

WILLIE F. MARSHALL,
Complainant,
VS.
HARRIET J. MARSHALL,
Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

WAIVER AND ANSWER

Comes the respondent in the above styled cause and accepts service of a copy of the bill of complaint in this 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 at any time without further notice to her.

And for answer to the bill of complaint and to each and every paragraph thereof, respondent says:

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

Harriet J. Marshall
RESPONDENT

STATE OF WASHINGTON, 0
COUNTY OF KING .0

I, ROBERT A. GRIMM, a Notary Public in and for said County and State, hereby certify that HARRIET J. MARSHALL, whose name is signed to the foregoing Waiver and Answer and who is known to me, acknowledged before me on this date that, being informed of the contents of said Waiver and Answer, she executed the same as her voluntary act.

Witness my hand and Official Seal this 6th day of March,

1958.

Robert A. Grimm
NOTARY PUBLIC, ~~BALDWIN~~ COUNTY, ~~ALABAMA~~
KING WASHINGTON

Trust Waiver

THE STATE OF MISSISSIPPI
COUNTY OF [illegible]
I, the undersigned, being a duly qualified and acting Register of the County of [illegible], do hereby certify that the within and foregoing instrument is a true and correct copy of the original as the same appears from the records of said County.

FILED

MAR 14 1958

ALICE J. DUCK, Register



SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

} No.

Circuit Court, Baldwin County

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Harriet J. Marshall

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

Harriett J. Marshall, Defendant

by Willie F. Marshall, Plaintiff

Witness my hand this 20th day of February 19 58

W. J. Duck, Clerk

WILLIE F. MARSHALL,
Complainant,
VS.
HARRIET J. MARSHALL,
Respondent.

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IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

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

Your complainant, WILLIE F. MARSHALL, respectfully represents and 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 citizen of Baldwin County, Alabama, and has been for more than two years next preceding the filing of this bill of complaint; that HARRIET J. MARSHALL is over the age of twenty-one years and is a non-resident of the State of Alabama, residing at 4251 Greenwood Avenue, Apartment B, Seattle 3, Washington; that her business address is % U. S. Civil Service, U. S. Navy Pier No. 91, Seattle, Wash.

2. That your complainant and the respondent were lawfully married on or about, to-wit: the 24th day of December, 1952, at Vancouver, Washington.

3. That said respondent voluntarily 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 recognized each other as husband and wife.

WHEREFORE, THE PREMISES CONSIDERED, your complainant makes the said HARRIET J. MARSHALL a party respondent to this bill of complaint, and in order that complainant may have the relief hereinafter prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said HARRIET J. MARSHALL, commanding her to plead, answer, or demur to this bill of complaint within the time required by law; and your complainant further prays that, on a final hearing hereof, your Honor will make and enter a decree forever divorcing your complainant from the said respondent; and that your Honor will grant such other, further, different or general relief as unto your Honor may seem just and proper, and your Complainant will ever pray, etc.

Willie F. Marshall
SOLICITOR FOR COMPLAINANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. 4228

WILLIE F. MARSHALL,
Complainant,
VS.
HARRIET J. MARSHALL,
Respondent.

BILL OF COMPLAINT FILED

FEB 20 1958

ALICE I. DUCK, Register

Respondent may be served by
Registered Mail: U. S. Civil
Service, U. S. Navy Pier 91,
Seattle, Washington.