

and in the Answer and Cross-Bill heretofore filed in his behalf
are true and correct.

Dated this 21st day of August, 1952.

Ernest Lee Langston

Sworn to and subscribed before
me this 21st day of August, 1952.

Malcolm S. Starnes
Notary Public, Baldwin County, Alabama

2853

RECORDED

2853

OFFICE

filed August 21, 1952
Aline J. Duck, Register

NANCY GRIFFIN LANGHAM,
Complainant and
Cross-Respondent,

vs.

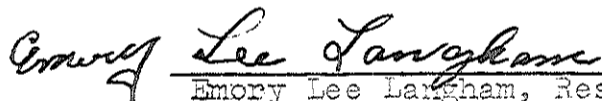
EMORY LEE LANGHAM,
Respondent and
Cross-Complainant.

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

TO THE HONORABLE TELFAIR J. WASHBURN, JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes now the Respondent and Cross-Complainant, Emory Lee Langham, and amends the Answer and Cross-Bill heretofore filed by him in this cause and in particular the Prayer for Relief contained therein, by adding to the Prayer for Relief, the following paragraph:

And Your Respondent and Cross-Complainant further prays that your Honor will enter an order granting to your Respondent and Cross-Complainant the temporary care, custody and control of Jimmy Lee Langham, Gloria Langham, Dorothy Langham and Donald Langham, pending a final determination of this cause.


Emory Lee Langham, Respondent and
Cross-Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Norborne C. Stone, Jr., a Notary Public in and for said County in said State, personally appeared Emory Lee Langham who is known to me and who, after being by me first duly and legally sworn, did depose and say under oath as follows:

That his name is Emory Lee Langham and that he is the Respondent and Cross-Complainant in the case of Nancy Griffin Langham, Complainant and Cross-Respondent, v. Emory Lee Langham, Respondent and Cross-Complainant, and that his name is signed to the foregoing amendment to the Answer and Cross-Bill heretofore filed in his behalf and that the facts alleged in said amendment and the

May 11, 1952, without just cause or legal excuse and the children mentioned in paragraph "5" above. That your Respondent has on several occasions requested the Complainant to return to the home which he has provided for her and the children but that she refused and continues to refuse to do so. That your Respondent is a fit and proper person to have the care, custody and control of the minor children of he and the Complainant and that the Complainant is not a fit and proper person to have the care, custody and control of such minor children.


WHEREFORE, the premises considered, your Respondent respectfully prays that this answer be taken as a Cross-Bill and that the Complainant, Nancy Griffin Langham be made a party thereto by service upon her under the rules of this Honorable Court and the Statutes in such cases made and provided.

Your Respondent further prays that upon a final hearing hereof that your Respondent be awarded the complete care, custody and control of Jimmy Lee Langham, Gloria Langham, Dorothy Langham, and Donald Langham, with the right of their mother, the Complainant, and Cross-Respondent, to visit the said children at reasonable intervals and reasonable hours.

And your Respondent and Cross-Complainant prays for such other, further and different relief as in equity will be meet and proper.

Respectfully submitted,

CHASON & STONE

By: 
Solicitors for Respondent and
Cross-Complainant.

NANCY GRIFFIN LANGHAM, ¶ IN THE CIRCUIT COURT OF
 ¶ BALDWIN COUNTY, ALABAMA
 ¶ IN EQUITY.
 ¶ NO. 2853.
 ¶ Respondent.

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes now the Respondent by his Solicitors, and for answer to the Bill of Complaint heretofore filed against him in said cause says as follows:

FIRST:

Your Respondent admits the allegation contained in paragraph "1" of the Bill of Complaint.

SECOND:

Your Respondent admits that he and the Complainant were married in Pensacola, Florida, on December 24, 1936, but he denies each and every other allegation contained in paragraph "2" and demands strict proof thereof.

THIRD:

Your Respondent denies each and every allegation contained in paragraph "3" of the Bill of Complaint and demands strict proof thereof.

FOURTH:

Your Respondent denies the allegations contained in paragraph "4" of the Bill of Complaint and demands strict proof thereof.

FIFTH:

Your Respondent admits the allegation contained in paragraph "5" of the Bill of Complaint relative to the names and ages of the children therein mentioned and the allegation that they were born to your Respondent and Complainant. Your Respondent denies each and every other allegation contained in said paragraph and demands strict proof thereof.

SIXTH:

For further answer to the Bill of Complaint heretofore filed against him, your Respondent alleges that the Complainant Nancy Griffin Langham did abandon your Respondent, voluntarily on

[Handwritten signature]
~~Solicitor for Complainant~~

Complainant prays, etc.

and your other, further or general relief to which she may be entitled, and your maintenance of said minor children, and your Complainant prays for such a decree granting to your Complainant permanent alimony for the support and and that upon a final hearing of this cause, that your Honor will render amount to be allowed your Complainant, Solicitor for his services herein, support and maintenance pending this suit, and that will be a reasonable reasonable amount to be allowed your Complainant as alimony for her Court to hold a reference and report to its Court what would be a his services herein and that your Honor will order the Register of this allowed as a reasonable Solicitor's fee to your Complainant's Solicitor for its without funds it is suggested that (one hundred (\$100.00) Dollars be amount of forty (\$40.00) Dollars per week and inasmuch as your Complainant grant to the Complainant permanent maintenance for said children in the Dorothy Langham, age 12; Donald Langham, age 10; that your Honor will the minor children, Jimmy Lee Langham, age 14; Gloria Langham, age 13; that your Complainant be awarded the custody, care and control of matrimony existing between your Complainant and Respondent.

Honor will grant to her an absolute divorce forever barring the bonds of your Complainant further prays that upon final hearing hereof your and the practice of this Honorable Court. to the same within the time and under the penalties prescribed by law bonds to be filed of complaint requiring him to plead, answer, or demand Honor will by proper procedure make the said minor children party hereto. WHEREFORE, the premises considered, your Complainant prays that your

PRAYER

and control. Plaintiff is a suitable, fit, and proper person to have their care, custody, and control. 13; Dorothy Langham, age 12; Donald Langham, age 10; and that your Complainant four children, Jimmy Lee Langham, age 14; Gloria Langham, age 13; that there was born between the marriage of your Complainant and the

5.

income to-wit: receiving from his employer a salary of \$65.00 per week. Your Complainant avers that said Respondent is a man of considerable

6.

2853

RECORDED

NANCY GRIFFIN LANGHAM

COMPLAINANT

VS

EMORY LEE LANGHAM

RESPONDENT

Bill of Complaint

From the Law Offices of
C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

FILED
JUL 25 1952
ALICE J. BUCK, Register

Executed July 25, 1952
by serving copy of within Summons and
Complaint on

Emory Lee Langham

Taylor Wilkins Sheriff
W. F. Hall Deputy Sheriff

STATE OF ALABAMA
BALDWIN COUNTY

You are hereby commanded to summon ELDON LEE LANGHAM, to appear and plead, answer or demur, within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by NANCY GRIFFIN LANGHAM, as Complainant, and against ELDON LEE LANGHAM, as Respondent.

WITNESS my hand this the 25th day of July, 1952.

Alice J. ...
Register.

NANCY GRIFFIN LANGHAM
COMPLAINANT

VS

ELDON LEE LANGHAM
RESPONDENT

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

TO HONORABLE TELFAIR J. MISHURN JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SAID:

Your Complainant, NANCY GRIFFIN LANGHAM, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County, Alabama and over twenty-one years of age.

2.

That your Complainant and the Respondent married in Pensacola, Florida, on December 24, 1936, and lived together as husband and wife in Baldwin County, Alabama until on to-wit May 16, 1952, when for the reason hereinafter set out your Complainant was forced to cease living with the Respondent.

3.

That on to-wit May 16, 1952, the Respondent cursed, threatened, struck and beat your Complainant and threatened to do such violence to her person which would necessarily endanger her life and health; that the conditions of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person that would necessarily endanger her life and health and further.

NANCY GRIFFIN LANGHAM,

Complainant and
Cross-Respondent,

vs.

EMORY LEE LANGHAM,

Respondent and
Cross-Complainant.

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

It having been made to appear to the Court in the above styled cause that the Complainant and ^{the Complainant} Cross-Respondent and Respondent and Cross-Complainant have four minor children, the custody of whom is asked by both of the parties to this proceeding ^{the Complainant} and the Respondent and Cross-Complainant having heretofore amended his Answer and Cross-Bill, ^{the Complainant} and ^{the Complainant} having prayed for the temporary custody and control of said minor children pending the final determination of this cause, it is therefore,

ORDERED, ADJUDGED AND DECREED by the Court that Emory Lee Langham, the Respondent and Cross-Complainant be and he hereby is awarded the temporary care, custody and control of Jimmy Lee Langham, Gloria Langham, Dorothy Langham and Donald Langham pending the final determination of this cause, with the right of the Complainant and Cross-Respondent to visit said children ~~and~~ ^{and have them visit her at} reasonable hours and at reasonable intervals during the pendency hereof.

Done this 21st day of August, 1952.

Telfair J. Mashburn, Jr.
Telfair J. Mashburn, Jr., Judge
of the Circuit Court of Baldwin
County, Alabama, In Equity.

NANCY GRIFFIN LANGHAM,

COMPLAINANT

VS

EMORY LEE LANGHAM

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

TO THE HONORABLE THOMAS J. WESMANN JR., JUDGE OF SAID COURT:

Comes your Petitioner, Nancy Griffin Langham, and respectfully represents and shows unto your Honor as follows:

1. That she has filed in this Honorable Court a bill seeking alimony for support and maintenance against the Respondent, Emory Lee Langham.

2. That she is without means of support during the pendency of this suit, and that said Respondent is well able to provide support and maintenance for your Complainant, but that said Respondent has refused and failed so to do.

The premises considered, your Petitioner prays that your Honor will order the Register of this Court to hold a reference and to ascertain and report to this Court what will be a reasonable amount to be allowed to your petitioner during the pendency of this suit, and your petitioner prays for general relief.


Attorney for Petitioner.

RECORDED

RECORDED

72 2853

Executed July 25, 1952
By serving a copy
of the within
Petition for Reference
on Emory Lee Langham

NANCY GRIFFIN LANGHAM

COMPLAINANT

VS

EMORY LEE LANGHAM

RESPONDENT

Taylor Wilkins
Sheriff
147 14th D.S.

Petition for Reference

From the Law Offices of
C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

Filed 7-25-52
A. J. Leuchter
Bay

NANCY GRIFFIN LANGHAM
COMPLAINANT
VS
EMORY LEE LANGHAM
RESPONDENT

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

TO THE REGISTER IN CHANCERY OF SAID COURT:

Upon consideration of the Petition of Nancy Griffin Langham filed in this cause, the same being duly read, considered and understood by the Court, it is, therefore, the Judgment of this Court, and it is ordered, adjudged, and decreed by the Court that the Register of this Court hold a reference according to law, under the rules of this Court, and ascertain and report to this Court what will be a reasonable amount to be allowed to the Complainant, Nancy Griffin Langham, for her support and maintenance during the pendency of this suit, and that the Register of this Court give notice of holding of said reference according to law.

Done this the _____ day of _____, 1952.

Circuit Judge.

copies of this returned to Mrs. Langham

FILED
JUL 23 1952
BALDWIN COUNTY, ALA.

Handwritten signatures and notes:
J. W. ...
J. W. ...
J. W. ...
J. W. ...
J. W. ...
J. W. ...

285-2

Nancy Griffin Langham

vs
Emory Lee Langham

FILED

JUL 25 1952

ALICE J. DUCK, Clerk

- 1. Compt
- 2. Petition deb Jo Shur
- 3. order

The undersigned hereby certifies that the within and foregoing are true and correct copies of the original papers filed in this case.

FILED	FILED
JUL 25 1952	JUL 25 1952
ALICE J. DUCK, Clerk	ALICE J. DUCK, Clerk

NANCY GRIFFIN LANGHAM
COMPLAINANT
VS
MEMORY LEE LANGHAM
RESPONDENT

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

TO THE REGISTER IN CHANCERY OF SAID COURT:

Upon consideration of the Petition of Nancy Griffin Langham filed in this cause, the same being duly read, considered and understood by the Court, it is, therefore, the Judgment of this Court, and it is ordered, adjudged, and decreed by the Court that the Register of this Court hold a reference according to law, under the rules of this Court, and ascertain and report to this Court what will be a reasonable amount to be allowed to the Complainant, Nancy Griffin Langham, for her support and maintenance during the pendency of this suit, and that the Register of this Court give notice of holding of said reference according to law.

Done this the 25th day of July, 1952.

Jelks J. Mashebery, Jr.
Circuit Judge.

Received in Sheriff's Office
this 25 day of July, 1952
TAYLOR WILKINS, Sheriff

2853

M

Executed July 25, 1952
By serving a copy of
the within order
for Reference on
Emory Lee Langham
Taylor Wilkins
Sheriff
14714 all
P.S.

NANCY GRIFFIN LANGHAM
COMPLAINANT
VS
EMORY LEE LANGHAM
RESPONDENT

Order for Reference

From the Law Offices of
C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

Filed 7-25-52
Aucif Leuch
Cuy