

CLANDER MOORE  
COMPLAINANT

VS

SAMUEL MOORE  
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY

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

And now comes your complainant, Clander Moore, and humbly complaining against Samuel Moore, defendant, respectfully shows unto your Honor:

FIRST:

That your complainant and the said Samuel Moore, are each over the age of twenty-one years, and are residents of Baldwin County, where they have resided all of their lives.

SECOND:

That your complainant and the said Samuel Moore are husband and wife, having intermarried in Baldwin County April 14, 1945, that they lived together at Tensaw, Alabama as husband and wife until defendant voluntarily abandoned this complainant in September, 1950, without just cause or reasonable excuse and that they have not lived together since the said abandonment.

THIRD:

That there was born to the complainant and defendant one child, Annie Mae, a girl six years old; that the said child is in the custody of this complainant; that the complainant is regularly employed and amply able to provide for said child and is the proper person to have custody of this child.

WHEREFORE, the premises considered, your complainant prays this Honorable Court will, by proper process, made the said Samuel Moore, party defendant, to this bill of complaint and require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this

Honorable Court.

Complainant further prays that upon the final hearing of the cause made by this bill of complaint this Honorable Court will make and enter an order and decree forever dissolving the bonds of matrimony existing between the complainant and the said defendant; and will further order and decree that this complainant have and retain the custody of the said minor child, Annie Mae; and complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive in the premises.

  
Solicitor for complainant.

Clander Moore  
vs.  
Samuel Moore

Complainant  
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:

Clander Moore and Willie Vay Wyatt

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

*W. C. Barber*  
Solicitor for Complainant

NOTE:

Complainant suggests the name of Madeline S. Bryars  
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

*W. C. Barber*  
Solicitor for Complainant.

2893

DEMAND FOR ORAL EXAMINATION

Claude Moore  
Complainant

vs.

Samuel Moore  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this

**FILED**

day of  
**SEP 16 1952**

194

**ALICE J. DUCK, Register**

Register

Moore Printing Co.

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Madeline S. Bryans

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 Clander Moore and Willie Mae Wyatt

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

Clander Moore, Complainant

and

Samuel Moore Respondent

on oath, to be by you administered, upon oral examination to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 16th day of September, 1952

Alice J. Wickett  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No. 2893

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

*Claude Moore*

Complainant—

vs.

*James Moore*

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

FILED

SEP 16 1952

WITNESSES:  
*ALICE J. BUCK, Register*

CLANDER MOORE,  
COMPLAINANT

VS

SAMUEL MOORE  
DEFENDANT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

And now comes the Defendant in his own proper person and accepts service of the summons and complaint in the above styled cause, and denies each and every allegation contained in the bill of complaint, and demands strict proof of the same.

The defendant waives notice of the time of taking testimony on behalf of complainant, the right to cross examine complainant's witnesses, and agrees that this cause be submitted forthwith for final decree without notice.

Samuel Moore  
Defendant

WITNESS:

Madeline S. Boyer

NOTED  
JAN 1 1960  
BALDWIN COUNTY

RECORDED  
JAN 1 1960

2893 RECORDED

Claude Moore  
Complainant

vs

Samuel Moore  
Defendant

Amend Wainor

FILED  
SEP 16 1952  
ALICE J. DUCK, Register



THE STATE OF ALABAMA  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

CLANDER MOORE

Complainant

VS.

SAMUEL MOORE

Respondent

I, Madeline S. Bryans

as Register and Commissioner

have called and caused to come before me Clander Moore and Willie Mae Wyatt

witnesses named in the Requirement for Oral Examination, on the 16<sup>th</sup> day of September  
1942, at the office of W. C. Beebe

in Bay Minette, Alabama, and having first sworn said Witnesses to speak the  
truth, the whole truth, and nothing but the truth, the said Clander Moore and Willie  
Mae Wyatt doth depose and say as follows:

My name is Clander Moore. I am the complainant in the cause pending in the Circuit Court of Baldwin County in equity, against Samuel Moore for divorce. I am 28 years of age. He is 25 years of age. We both live in Baldwin County where we have lived continuously all of our lives. We were married in Baldwin County April 14, 1945 and lived together as husband and wife until September 1950 when he voluntarily abandoned me without just cause or reasonable excuse and he has remained away continuously from that date to this day. We have one child, Annie Mae, aged 6. She is in my custody. I am amply able to provide for her and am willing and will do so. I am regularly employed.

Clander Moore

My name is Willie Mae Wyatt. I am 39 years old. I have known Clander Moore and Samuel Moore all of their lives. They were married in April, 1945. He abandoned her without just cause or reasonable excuse in 1950. They have not lived together as husband and wife since. Clander is amply able to provide for their child, Annie Mae.

Willie Mae Wyatt

**ORAL EXAMINATION.**

I, Madeline S. Bryans, 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 W. C. Beebe 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 16<sup>th</sup> day of September, 1942

Madeline S. Bryans (L. S.)

NO. 2893 PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Madeline S. Bryans  
vs. James P. Moore  
Complainant

Respondent.

**Oral Deposition**

Filed SEP 17 1942, 1942  
Register.

Recorded in SEP 17 1942  
Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_  
Register.

Clander Moore

Complainant

vs.

Samuel Moore

Defendant

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, \_\_\_\_\_  
demand for oral deposition, oral deposition of witnesses,

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

*Alice J. Newby*

Register.

M

No. 2893

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

Claude Moore

Complainant

vs.

Jimmey Moore

Defendant

NOTE OF TESTIMONY

Filed in Open Court this

day of

FILED  
SEP 16 1953  
ALICE J. DUCK Register.

Printed By: Baldwin Times

The State of Alabama, Baldwin County  
CIRCUIT COURT, IN EQUITY

CLANDER MOORE, Complainant

vs.

SAMUEL MOORE, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confessione~~  
ANSWER & WAIVER and Testimony as noted by the Register, and upon con-  
sideration 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 CLANDER MOORE is forever divorced from the  
said SAMUEL MOORE for and on account of  
ABANDONMENT

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the complainant,  
Clander Moore, have custody of the said minor child, Annie Mae  
Moore.

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 Clander Moore  
the complainant pay the cost herein to be taxed, for which execution may issue.

This 16<sup>th</sup> day of September, 1952.

J. J. Madbury, Jr.  
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 de-  
cree 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. 2893 Page \_\_\_\_\_

The State of Alabama  
Baldwin County

In Circuit Court, In Equity

Complainant

vs.

Respondent

**DIVORCE DECREE**