

4230

GRAHAM A. SULLIVAN
ATTORNEY AT LAW
VAN ANTWERP BUILDING
MOBILE 12, ALABAMA
HEMLOCK 3-4761

February 24th., 1958

Register in Equity
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Sir:

Will you please file the enclosed bill for divorce in your court. The answer and waiver will be mailed you within a few days.

Yours very truly,

Graham A. Sullivan
GRAHAM A. SULLIVAN

GAS/ref
Encls. 1

Clayton H. Willis,
 Complainant

No. Vs.

Mavis N. Willis,
 Defendant

BALDWIN
 CIRCUIT COURT OF ~~MOBILE~~
 COUNTY, ALABAMA
 IN EQUITY

DEMAND FOR ORAL EXAMINATION

The State of Alabama }
~~Mobile~~ County }
 Baldwin }

The complainant requests the oral examination of the following named witnesses
 on his behalf, viz:

Clayton H. Willis
 Edward Yates

said witnesses reside in the County of Mobile, State of Alabama

Roselle C. Finch who reside at Mobile, Alabama

is suggested as a suitable person to be appointed Commissioner to take deposition of said witness on
 such oral examination.

Filed.....
 W. ELSWORTH HAUGHTON, Register.

Graham A. Sullivan

 Solicitor for Complainant

No.

~~BALDWIN~~

~~CIRCUIT COURT OF MOBILE COUNTY~~

Mobile, Alabama

Clayton H. Willis,

Vs.

Mavis N. Willis,

DEMAND FOR ORAL EXAMINATION

FILED

APR 3 1958

ALICE L. BUCK, Register

GRAHAM A. SULLIVAN
ATTORNEY AT LAW
VAN ANTWERP BUILDING
MOBILE 12, ALABAMA
—
HEMLOCK 3-4761

April 2nd., 1958

Register in Equity
Circuit Court of Baldwin County
Bay Minette, Alabama

Dear Sir:

I am forwarding to you herewith answer and waiver and also demand for oral examination in the case of Clayton H. Willis vs Mavis N. Willis. Will appreciate your forwarding commission to take testimony as soon as possible.

Yours very truly,

Graham A. Sullivan
GRAHAM A. SULLIVAN

GAS/rcf

	Clayton H. Willis,	Complainant
No.	Vs.	
	Mavis N. Willis,	Defendant

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

ANSWER AND WAIVER

Comes the Defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegation of said Bill of Complaint and demands strict proof thereof.

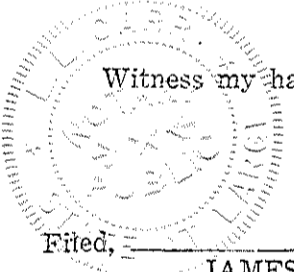
I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

Mavis N. Willis
Defendant

STATE OF Ala
COUNTY OF Mobile

I, L L Carr NOTARY PUBLIC in and for said State and County, do hereby certify that Mavis N. Willis whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, She executed the same voluntarily on the day same bears date.

Witness my hand and seal this 4th day of March, 1958



Filed, JAMES A. CRANE, REGISTER

L L Carr
NOTARY PUBLIC

STATE OF Ala
COUNTY OF Mobile

Filed April 3, 1958
Alice J. Luck, Register

No. _____

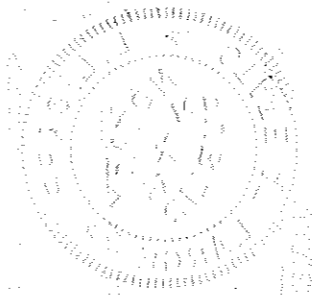
VS.

ANSWER AND WAIVER

Filed **FILED**
APR 3 1958, 19

ALICE J. BUCK, Register

Register



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Clayton H. Willis,

Complainant,

vs

Mavis N. Willis,

Respondent.

In the Circuit Court of
Baldwin County, Alabama.

In Equity

No. _____

TO THE HONORABLE JUDGES OF SAID COURT, SITTING IN EQUITY:-

1. Complainant avers that he and respondent are each over twenty-one years of age and that each of them is a bona fide resident citizen of the State of Alabama and have been such for more than one year next immediately preceding the filing of this bill of complaint.

2. Complainant avers that he is the lawful husband of the respondent, they having been lawfully married to each other on October 23rd., 1954 at Pascagoula, Mississippi, of which marriage there is no issue.

3. Complainant avers that respondent voluntarily abandoned his bed and board without any cause or fault on his part, without his consent and without any intention to return during the month of February, 1955 and that said abandonment has been continuous and uninterrupted for more than one year next immediately preceding the filing of this bill of complaint.

PRAYER FOR PROCESS

Complainant prays that upon the filing of this bill of complaint that proper process issue to Mavis N. Willis, making her a party respondent and requiring her to appear and plead, answer or demur to the allegations thereof within the time required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant prays that upon the final hearing hereof that your Honors will grant him an absolute divorce from the respondent and grant him permission to remarry in the event he should so care and he prays for all such other, further or different relief to which he is entitled, the premises considered.

Clayton H. Willis
Complainant

Graham A. Sullivan
Solicitor for the Complainant ----

Filed Feb. 25, 1958
Alice J. Luck, Register

4238

FILED

FEB 25 1958

ALICE J. BUCK, Register