

4189

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

VIOLA L. CHAVERS, Complainant

vs.

EDWARD R. CHAVERS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ ~~or~~ ~~Respondent's answer and waiver~~ 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 VIOLA L. CHAVERS is forever divorced from the said EDWARD R. CHAVERS.

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 futher 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 VIOLA L. CHAVERS the complainant pay the cost herein to be taxed, for which executed may issue.

This 9 day of June 19 58

Hubert M. Hice

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 day of June, 1958.

Register of Circuit Court, In Equity.

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

VIOLA L. CHAVERS

Complainant

vs.

EDWARD B. CHAVERS

Respondent

DIVORCE DECREE

FILED

JUN 13 1958

ALICE J. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY at LAW  
FOLEY, ALA.

VIOLA L. CHAVERS

vs.

EDWARD R. CHAVERS

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, \_\_\_\_\_  
respondents answer and waiver; commissioned to take testimony.  
Oral Deposition of the Complainants Witness

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

*Arthur Epperson*

Attorney for Complainant

*Bev. J. ...*

Register.

No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

VIOLA L. CHAVERS

vs.

EDWARD R. CHAVERS

**NOTE OF TESTIMONY**

Filed in Open Court this **FILED**

day of **JUN 9** 1958, 194 58

**ALICE J. BUCK, Register**

Register.

Printed by the Baldwin Times

VIOLA L. CHAVERS,  
Complainant,  
-vs-  
EDWARD R. CHAVERS,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY  
CASE NO. 4189

Comes the Respondent in the above styled cause and accepts service of a Bill of Complaint heretofore filed in said 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.

And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

1. He admits the allegations contained in Paragraph 1 of the Bill of Complaint.
2. He admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. He denies each and every allegation contained in Paragraph 3 of said Bill of Complaint, and demands strict proof thereof.
4. He denies each and every allegation contained in Paragraph 4 of said Bill of Complaint, and demands strict proof thereof.

Edward R. Chavers *his*  
*Mark-*  
 witness to  
 signing by mark.  
[Signature]

Sworn to and subscribed before me, a Notary Public, on this the 8<sup>th</sup> day of January, 1958.  
[Signature]  
 Notary Public, Baldwin County, Alabama

*Answer And Waiver*

**FILED**

**JUN 9 1958**

**ALICE L. BOCK, Register**

VIOLA L. CHAVERS )  
COMPLAINANT )  
VS. )  
EDWARD R. CHAVERS )  
RESPONDENT )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

NO. \_\_\_\_\_

To the Honorable Hubert M. Hall, Judge of the Circuit Court,  
Sitting in Equity:

Your complainant VIOLA L. CHAVERS, respectfully represents  
and shows unto your Honor:


1. That your complainant is over the age of twenty-one  
years and is a resident of said State and County and has been a  
bona fide resident of said state and county for more than thirty  
years next preceding the filing of this bill of complaint; that  
Edward R. Chavers is over the age of twenty-one years and resided  
in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully  
married on or about to-wit: February 23, 1934, at Pensacola,  
Florida.

3. Complainant further avers 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 way recognized each other as husband  
and wife.

4. Complainant avers and charges that respondent has  
made numerous threats of doing physical harm and from his manner  
and conduct toward her, she is reasonably convinced that he will  
commit an actual violence upon her person, attended with danger  
to her life and health.

The premises considered, your complainant makes the said  
Edward R. Chavers, a party respondent to this bill of complainant,  
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 Edward R. Chavers,  
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

4189

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

\*\*\*\*\*

VIOLA L. CHAVERS  
COMPLAINANT

VS.

EDWARD R. CHAVERS  
RESPONDENT

\*\*\*\*\*

BILL OF COMPLAINT

\*\*\*\*\*

FILED  
DEC 19 1957

ALICE J. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.



**THE STATE OF ALABAMA,**

CIRCUIT COURT, BALDWIN COUNTY

BALDWIN COUNTY

No. 4189

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon EDWARD R. CHAVERS

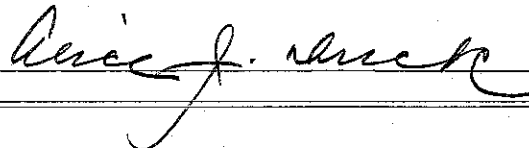
to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against \_\_\_\_\_

EDWARD R. CHAVERS, Defendant .....

by VIOLA L. CHAVERS

....., Plaintiff.....

Witness my hand this 19 day of Dec. 1957

 Clerk

No. 4189 ✓

Page .....

THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

VIOLA L. CHAVERS

Plaintiffs

vs.

EDWARD R. CHAVERS

Defendants

SUMMONS and COMPLAINT

Filed Dec. 19, 1957, 19.....

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

12-19, 1957

Sheriff

I have executed this summons

this *Rec'd* 1957  
by leaving a copy with  
*Edward R. Chavers*

Sherriff claims *72* miles  
Ten Cents per mile Total \$ *7.20*  
TAYLOR WILKINS, Sheriff  
BY *Chadwick*  
DEPUTY SHERIFF

*Taylor Wilkins* Sheriff  
*Chadwick* Deputy Sheriff

*Kolay*

VIOLA L. CHAVERS )  
COMPLAINANT )  
VS. )  
EDWARD R. CHAVERS )  
RESPONDENT )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

NO. \_\_\_\_\_

To the Honorable Hubert M. Hall, Judge of the Circuit Court,  
Sitting in Equity:

Your complainant VIOLA L. CHAVERS, respectfully represents  
and shows unto your Honor:

1. That your complainant is over the age of twenty-one  
years and is a resident of said State and County and has been a  
bona fide resident of said state and county for more than thirty  
years next preceding the filing of this bill of complaint; that  
Edward R. Chavers is over the age of twenty-one years and resided  
in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully  
married on or about to-wit: February 23, 1934, at Pensacola,  
Florida.

3. Complainant further avers 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 way recognized each other as husband  
and wife.

4. Complainant avers and charges that respondent has  
made numerous threats of doing physical harm and from his manner  
and conduct toward her, she is reasonably convinced that he will  
commit an actual violence upon her person, attended with danger  
to her life and health.

The premises considered, your complainant makes the said  
Edward R. Chavers, a party respondent to this bill of complainant,  
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 Edward R. Chavers,  
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.

*Arthur C. Johnson*  
SOLICITOR FOR COMPLAINANT

LOPEX VLV  
VLOKME VL FVM  
EBBE

CHIVERS

ALABAMA  
BALDWIN COUNTY  
IN EQUITY

4183

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA



THE STATE OF ALABAMA }  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

VIOLA L. CHAVERS

Complainant

VS.

EDWARD R. CHAVERS

Respondent

I, Justine Gardner

as Register and Commissioner

have called and caused to come before me Viola L. Chavers

witness named in the Requirement for Oral Examination, on the 7 day of June  
19~~X~~ 58, at the office of Justine Gardner  
in Foley, Alabama, and having first sworn said Witness to speak the  
truth, the whole truth, and nothing but the truth, the said Viola L. Chavers  
doth depose and say as follows:

My name is Viola L. Chavers. I am over the age of twenty-one years and I am and I have been a bona fide resident of Baldwin County, Alabama for the past thirty years; Edward R. Chavers, the respondent, is over the age of twenty-one years and is now a resident of Baldwin County, Alabama and has been a resident of Baldwin County, Alabama for the past thirty years.

I was lawfully married to Edward R. Chavers, February 23, 1934 in Pensacola, Florida.

Edward R. Chavers voluntarily abandoned me for more than one year ago before I filed this suit for a divorce. Since he abandoned me he has not in any way contributed to my support and we have not lived together or in any way recognized each other as husband and wife.

*Viola L. Chavers*

4189

**ORAL EXAMINATION.**

I, Justine Gardner, 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 her and she signed the same in the presence of myself Justine Gardner

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 7th day of June, 1948

Justine Gardner (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

VIOLA L. CHAVERS

vs. Complainant

EDWARD R. CHAVERS

Respondent.

**Oral Deposition**

Filed \_\_\_\_\_, 1948

**FILED**  
Register.

Recorded in 1958

Record

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

Register.