

4196

LILA MAE BEXLEY
 Complainant,
 Vs. LYMAN JACK BEXLEY
 Respondent.

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

ANSWER AND WAIVER

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

Respondent agrees that the testimony in this cause may be taken by deposition on oral examination, and waives notice of the time and place of the taking of such testimony and agrees that this cause may be submitted for final decree at any time. Respondent waives all notices to which he or she may be entitled by law in this cause. Respondent agrees that Peggy Preston may take the testimony in this cause as commissioner, without the issuance of a commission.

ATTEST:

1. _____
 2. _____

Lyman Jack Bexley
 RESPONDENT

Complainant agrees that Peggy Preston may take the testimony in this cause as commissioner, without issuance of a commission.

William D. Chapman
 SOLICITOR FOR COMPLAINANT.

Note: The Space below is intended for "Agreements Between the Parties"

Complainant hereby releases the Respondent from all claims of alimony and support, both temporary and permanent.

Respondent agrees that the Complainant should be granted the custody and control of the minor children mentioned in the bill of complaint herein.

Lyman Jack Bexley
 Respondent
William D. Chapman
 Complainant

STATE OF ALABAMA
 COUNTY OF MOBILE

Before me, the undersigned authority, in and for said State and County personally appeared the above named Respondent, whose name is signed to the foregoing instrument, and who was made known to me, acknowledged before me this day, that being informed of the contents of the instrument, said Respondent executed the same voluntarily on the day same bears date.

Witness my hand and seal this 13th day of JANUARY 1958.

Filed in Registers Office
 JAN 13 1958 195
 W. ELSWORTH HAUGHTON, REGISTER

William D. Chapman
 NOTARY PUBLIC
 (Please affix official seal)

Berley
vs
Berley

FILED
JAN 17 1958
ALICE J. BUCK, Register
JAN 13 1958

LILA MAE BEXLEY, | IN THE CIRCUIT COURT OF
 | BALDWIN COUNTY, ALABAMA
 | IN EQUITY:
-vs- |
LYMAN JACK BEXLEY, |
 | NO. _____
 |

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and
unto this Honorable Court as follows:

ONE

Complainant is the wife of the Respondent and they
were married to each other on December 23, 1949 in Lucedale,
Mississippi. Both the Complainant and the Respondent are
bona-fide resident citizens of Mobile County, State of Alabama
and have been such for more than one year next preceding the
filing of the Bill of Complaint herein. Both the
Complainant and the Respondent are each over the age of twenty--
one years. There are three minor children issue of their marriage
Mary Jane Bexley, age seven years, Edward Leon Bexley, age six
years and Jimmy Edward Bexley, age eighteen months. Said children
live and reside with the Complainant and she is a fit and proper
person to be granted their custody and control.

TWO

The Respondent has committed actual violence upon the
person of the Complainant, attended with danger to her life
or health, or from his conduct there is reasonable apprehension
of such violence.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction
of this cause, will make the said Lyman Jack Bexley, party-
respondent hereto, and will cause him to appear, plead, answer
or demur hereto within the time allowed by law and the rules
of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant her an absolute divorce from the bonds of matrimony with the Respondent, and Complainant prays that she will be granted the custody and control of their three minor children, and Complainant further prays for such other, further and different relief as in equity she may be due, and as in duty bound she will ever pray, etc.


SOLICITOR FOR COMPLAINANT.

H196

FILED

JAN 11 1958

ALICE I. DICK, Register