

4249

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ARCHIE FLOWERS

Complainant

vs.

LAVADA FLOWERS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Answer and waiver~~ on 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

Archie Flowers

is forever divorced from the

said Lavada Flowers

for and on account of

Adultery

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 payment of the cost of this suit.

It is further ordered that Archie Flowers

the Complainant

pay the cost herein to be taxed, for which executed may issue.

This 30 day of March 1958

Hubert M. Hall

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 decree is on file and enrolled in my office.

Witness my hand and seal this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Register of Circuit Court, In Equity.

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Archie Flowers

Complainant

vs.

LaVada Flowers

Respondent

DIVORCE DECREE

*Filed 4-1-58  
Wing French  
Clerk*

Archie Flowers

vs.

LaVada Flowers

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, \_\_\_\_\_  
answer and waiver of the Respondent and testimony of Archie Flowers \_\_\_\_\_

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

Register.

*Archie Flowers*

*LaVada Flowers*

No. ....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

Archie Flowers

vs.

LaVada Flowers

**NOTE OF TESTIMONY**

Filed in Open Court this 29

day of March, 1958

*Archie Flowers*  
Register.

Printed By The Baldwin Times

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

Archie Flowers

COMPLAINANT

VS.

Lavada Flowers

RESPONDENT

I, Evelyn Watts

as ~~Register and~~ Commissioner

have called and caused to come before me Archie Flowers

witness named in the requirement for Oral Examination, on the 29 day of March  
19 58, at the office of Tolbert M. Brantley

in Bay Minette, Alabama, and having first sworn said witness to speak the  
truth, the whole truth, and nothing but the truth, the said Archie Flowers

doth depose and say as follows:

My name is Archie Flowers. I am the Complainant in this cause. Lavada Flowers and I were married to one another in Bay Minette, Alabama, on June 5, 1946. The Respondent and I are resident citizens of Baldwin County, Alabama, and have been such for the past ten years, and are over twenty-one years of age. We lived together as man and wife until about 1954. At that time my wife, Lavada Flowers, left me and moved in the home with Johnny Nichols and lived with him for more than a year holding herself out to be the wife of Johnny Nichols during this period of time. My wife returned and lived with me after this date. In the latter part of 1957 my wife, Lavada Flowers, started leaving home and would go and stay in Mobile and in New Orleans for as long as a month at a time. When she was in Mobile and New Orleans she would hang around the beer joints, seaman's clubs and taxi stands. My wife left me in December of last year and has not returned since that time. She told me at that time and has told me on occasions since then that she had another man and was not going to return and live with me. During this latter period of time she has committed adultery with various men, whose names are to me unknown.

Archie Flowers

I, Evelyn Watts as ~~Register~~ and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness\_\_\_\_\_ and read over to him and he signed the same in the presence of myself and Tolbert M. Brantley at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness\_\_\_\_\_ or had proof 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 29 day of March, 19 58

Evelyn Watts (L. S.)

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

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**IN CIRCUIT COURT, IN EQUITY**

**Archie Flowers**

**COMPLAINANT**

**LaVada Flowers**

**vs.**

**RESPONDENT**

**ORAL DEPOSITION**

Filed 3-29, 19 58

Archie Flowers Register.

RECORDED IN

Record

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

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Evelyn Watts

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Archie Flowers

a witness in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Archie Flowers is

and LaVada Flowers is , Complainant

Respondent

on oath, to be by you administered, upon Archie Flowers  
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 29 day of

March

, 1958

Archie Flowers  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Archie Flowers

VS.

Complainant

LaVada Flowers

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

Archie Flowers



RES PONDENT

IN EQUITY

La Veda Flowers

Given under my hand and seal on this the 29<sup>th</sup> day of March 1958.

March  
I Robert M B Santer  
Notary Public,

ARHIE FLOWERS

COMPLAINANT

VS

LAVADA FLOWERS

RESPONDENT

ANSWER AND WAIVER

*Filed 3-29-58  
Ainsworth  
Rex*

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA;

You are hereby commanded to summon LAVADA FLOWERS 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 ARCHIE FLOWERS as Complainant and against LaVada Flowers, as Respondent.

WITNESS my hand this the \_\_\_\_\_ day of \_\_\_\_\_, 1958.

Register

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ARCHIE FLOWERS	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA,
VS.	Ø	IN EQUITY
LAVADA FLOWERS	Ø	
RESPONDENT	Ø	

TO HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY;

Your Complainant, Archie Flowers, respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are over twenty-one years of age and are bona fide resident citizens of Baldwin County, Alabama, and have been for more than two years next preceding the filing of the bill of complaint.

2.

That your Complainant and the Respondent were married in Bay Minette, Alabama, on June 5, 1946, and lived together as husband and wife in Baldwin County, Alabama, until the latter part of 1957.

3.

The Complainant alleges that the Respondent has committed various acts of adultery with various men. That she lived in adultery with Johnny Nichols for more than one year beginning in the early part of 1954; and has committed acts of adultery with other men whose names are to your Complainant unknown; that said acts have been committed without the connivance or consent of this Complainant and have occurred since the latter part of 1957.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said LaVada Flowers party respondent to this Bill of Complaint requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practices of this Honorable Court.

Your Complainant prays that upon a hearing hereof, Your Honor will enter an order and decree granting to him an absolute decree of divorce forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.

Wilters & Brantley

By: Robert M Brantley  
Solicitors for the Complainant

no. 4249

ARCHIE FLOWERS

COMPLAINANT

VS

LAVADA FLOWERS

RESPONDENT

BILL OF COMPLAINT

Filed 3-29-58  
Archie Flowers  
Ray