

RALPH LARCENIA GRAVES,
Complainant,
VS.
JOSEPHINE GRAVES,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 3433

Answer

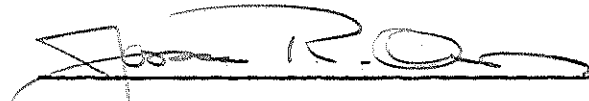
Now comes the Respondent in the above styled cause and for answer to the Bill of Complaint heretofore filed in this cause says:

1. She admits the allegations of paragraph one of the Bill of Complaint.
2. She admits that she and the Complainant were married in Baldwin County, Alabama, on or about June 30, 1951, but denies each and every other allegation of paragraph two of the Bill of Complaint and demands strict proof thereof.
3. She denies each and every allegation of paragraph three of the Bill of Complaint and demands strict proof thereof.
4. For answer to paragraph four of the Bill of Complaint she admits that Alice Graves was born to this marriage and that the said Alice Graves is three years of age; she admits that she is a suitable, fit and proper person to have the care, custody and control of said child. For further answer to paragraph 4 of the Bill of Complaint she alleges and avers that also was born to this marriage a child, Dollie Ann Graves, age eleven months and that she is a suitable, fit and proper person to have the care, custody and control of this child.
5. The Respondent denies each and every other allegation of the said Bill of Complaint and demands strict proof thereof.
6. The Respondent for further answer to the Bill of Complaint alleges that it has become necessary for her to employ an attorney to represent her in this cause and avers that she is without means to pay her said attorney to represent her and protect her interest in this cause.

The premises considered, your Respondent prays that this court will make and enter an order directing the Register of this court to hold a reference to ascertain what estate, if any, the Complainant and the Respondent has, separately or jointly and to ascertain what amount, if any, the Complainant should pay to the Respondent's attorney for his services rendered and to be rendered herein.

FILED

Jan. 11 1933
ALICE E. ROCK, Clerk


Solicitor for Respondent.

RECORDED

ANSWER

RALPH LARCENIA GRAVES,
Complainant,

VS.

JOSEPHINE GRAVES,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 3433

FILED

JAN 11 1955

ALICE J. DUCK, Register

RALPH LARCENIA GRAVES,
Complainant,
VS.
JOSEPHINE GRAVES,
Respondent.


IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 3433

ANSWER TO AMENDED COMPLAINT

Now comes the Respondent in the above styled cause and for answer to the amendment to the Bill of Complaint filed in this causes says:

1. She denies each and every allegation of the amendment to the Bill of Complaint and demands strict proof thereof.

FILED
12-28-55
ALICE I. OUCK, Clerk


Attorney for Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 3433

RECORDED
INDEXED
BALDWIN COUNTY, ALABAMA
CLERK OF THE CIRCUIT COURT

ANSWER TO AMENDED COMPLAINT
RALPH LARGENIA GRAVES,
Complainant,
vs. **RECORDED**
JOSEPHINE GRAVES,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 3433

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STATE OF ALABAMA
BALDWIN COUNTY

BOOK 018 PAGE 251

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Josephine Graves, 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 Ralph Larcenia Graves, as Complainant and against Josephine Graves, as Respondent.

Witness my hand this the 28 day of December, 1951.

Alice J. March
Register.

RALPH LARCENIA GRAVES
COMPLAINANT,
VS
JOSEPHINE GRAVES
RESPONDENT.

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

TO THE HONORABLE H. L. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Your Complainant, Ralph Larcenia Graves, respectfully represents unto your Honor and this Honorable Court as follows:

That your Complainant is a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age; that the Respondent is over the age of 18 years and is a bona fide resident of Baldwin County, Alabama.

That your Complainant and the Respondent married in Baldwin County, on June 30, 1951, and lived together as husband and wife until on, to-wit, August 1, 1953.

That on, to-wit, August 1, 1953, while your Complainant and Respondent were living together as husband and wife, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

There was born as fruits of this marriage between the Complainant and the Respondent one child, Alice Graves, age three years; that the mother of said child is a suitable, fit and proper person to have the care, custody and control of this child.

BOOK 018 PAGE 252

WHEREOF, the premises considered, your Complainant prays that your Honor will by proper procedure take the said Josephine Graves, party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

That the mother, Josephine Graves, Respondent in this cause be awarded the care, custody, and control of the infant child, Alice Graves; that your Honor will grant to the Respondent permanent maintenance for said child in the amount of Twenty-five (\$25.00) Dollars per month; and that upon a final hearing of this cause, that your Honor will render a decree granting to the Respondent permanent alimony for the support and maintenance of said infant, and your Complainant prays for such other, further or general relief to which he may be entitled, and your Complainant prays, etc.

FILED
Dec. 28 1934
ALICE J. DUCK, Clk

[Handwritten Signature]
Solicitor for the Complainant

Received in Sheriff's Office
this 28 day of Dec 1954
TAYLOR WILKINS, Sheriff

RECORDED 3433

RALPH LARGENIA GRAVES
COMPLAINANT

VS

JOSEPHINE GRAVES
Bay Minette
RESPONDENT

SUMMONS AND COMPLAINT

By *Taylor Wilkins*
TAYLOR WILKINS, Sheriff

By service on *Josephine Graves*

on

I served a copy of the within *disc*

and on 28 day of Dec 1954

Received day of

FILED
DEC 28 1954

Alice J. Deek, Registrar

From the law offices of
C. LeNoir Thompson
Attorney-At-Law
Bay Minette, Alabama

RECORDED

FINAL DECREE

RALPH LARCENIA GRAVES,
Complainant,
VS.
JOSEPHINE GRAVES,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY NO. 3433

*Filed
6-7-55
Alice J. Duck
Register*

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RALPH LARCENIA GRAVES

vs.

JOSEPHINE GRAVES

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, _____
AMENDMENT TO BILL OF COMPLAINT, REPLICATION, TESTIMONY OF RALPH LARCENIA GRAVES
AND TESTIMONY OF _____

and in behalf of Defendant upon ANSWER AND ANSWER TO AMENDED COMPLAINT.

No. 3433

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

RLPH LARCENIA GRAVES

vs.

JOSEPHINE GRAVES

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

Register.

Printed by the Baldwin Times

RALPH LARCEVIA GRAVES

COMPLAINANT

VS

JOSEPHINE GRAVES

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the Complainant and amends said complaint filed in said cause by adding thereto count 3A:

3A

That said Respondent has committed adultery with divers parties whose names to your complainant are unknown; that said acts were committed since the marriage between the parties to this cause and without the connivance or consent of your complainant.

WHEREOF, the premises considered, your complainant prays that your Honor will by proper procedure make the said Josephine Graves, party respondent to this amended bill of complaint requiring her to plead, answer or demure to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further 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; that a decree be made awarding to him the custody, care and control of the minor child, Alice Graves, age approximately three years; your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.

FILED

5/13 1955

ALICE J. DUCK, Clerk

E. Lewis Thompson
Solicitor for the Complainant.

Filed 5/13/55
H. H. Hall
Judge

RECORDED

RALPH LARCENIA GRAVES,
 Complainant
 VS
 JOSEPHINE GRAVES
 Respondent

IN THE CIRCUIT COURT OF
 BALDWIN COUNTY, ALABAMA

IN EQUITY.

NO. 3433

Comes the Complainant in the above styled cause and by replication to the answer filed by the Respondent in said cause joins issue on said answer and each paragraph thereof except as to paragraph four.

1.

In which your Complainant alleges that the said child infant, Dollie Ann, is an illegitimate child of the said Josephine Graves and is not the child of the Complainant to this cause as admitted by the said Josephine Graves.

2.

AND further as to Count six of said answer that the said Josephine Graves is receiving approximately One Hundred Seventeen (\$117.00) Dollars a month and that said One Hundred Seventeen (\$117.00) Dollars constitutes an ample sum from which the said Respondent should compensate her attorney inasmuch as said sum is paid regularly by the Complainant to the Respondent.

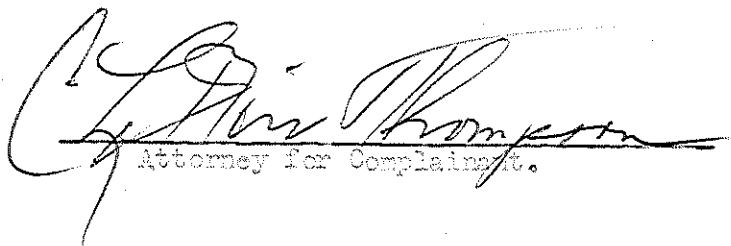
3.

AND further that there is no property to be divided between the parties.

FILED

Feb. 2 1955

ALICE I. DUCK, Clerk


 Attorney for Complainant.

RECORDED

RALPH LARCENIA GRAVES

COMPLAINANT

VS

JOSEPHINE GRAVES

RESPONDENT

REPLICATION

FILED

FEB 2 1955

ALICE J. DUCK, Register

From the law offices of:

C. Lenoir Thompson
Attorney-At-Law

Bay Minette, Alabama

3433