

(4292)

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

JOSEPHINE GRAVES

Complainant

vs.

RALPH L. GRAVES

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confession~~ 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 Josephine Graves is forever divorced from the said Ralph L. Graves for and on account of voluntary abandonment.

It is further ORDERED, ADJUDGED AND DECREED that the Complainant Josephine Graves have the care, custody and control of the said minor children of this marriage to-wit, Alice Yvonne Graves and Dolly Ann Graves, and that the Respondent Ralph L. Graves, pay to the Complainant, Josephine Graves the monthly sum of \$50.00 for the support and maintenance of said minor children. The Respondent Ralph L. Graves shall have the right to visit the said minor children at such times and places as may be reasonable.

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 Ralph L. Graves the Respondent pay the cost herein to be taxed, for which executed may issue.

This 23 day of May 19 58

Hubert M. Lane
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 the day of May, 19 58.

Register of Circuit Court, In Equity.

No. 4292 Page -----

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

JOSEPHINE GRAVES,

Complainant

vs.

RALPH L. GRAVES,

Respondent

DIVORCE DECREE

filed
5-23-58
W. H. Luck
Register

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: ALICE L. MILLER

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 Josephine Graves, a

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

and Ralph L. Graves is , Complainant

Respondent

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

Witness 17th day of May

, 1958

Alice J. Duck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JOSEPHINE GRAVES,

Complainant

VS.

RALPH L. GRAVES,

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Alice L. Miller

WITNESSES:

Josephine Graves.

FILED
MAY 23 1958
ALICE J. DUCK, Clerk

JOSEPHINE GRAVES,

Complainant,

vs.

RALPH L. GRAVES,

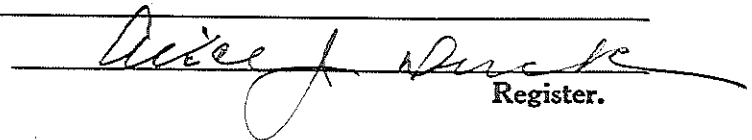
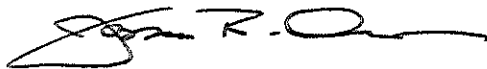
Respondent.

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,
Commission to take deposition, oral deposition of Josephine Graves

and in behalf of Defendant upon answer and waiver


Register.

No. 4292

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

JOSEPHINE GRAVES

Complainant,

VS.

RALPH L. GRAVES,

Respondent.

Note of Testimony

Filed in Open Court this 23

day of May, 1958

Dirig. Welch
Register.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

JOSEPHINE GRAVES, COMPLAINANT

vs.

RALPH L. GRAVES, RESPONDENT

I, Alice L. Miller

Register and Commissioner

have called and caused to come before me Josephine Graves

witness named in the requirement for Oral Examination, on the _____ day of May
19 58, at the office of James R. Owen

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

doth depose and say as follows:

My name is Josephine Graves and I am the Complainant in the above styled cause. The Respondent and I are both over the age of twenty-one years and are both bona fide resident citizens of Baldwin County, Alabama, and have been bona fide resident citizens of said State and County for more than two years next preceding the filing of the Bill of Complaint in this cause.

The Respondent and I were lawfully married in Baldwin County, Alabama, on or about, to-wit, the 30th day of June, 1951, and we lived together as husband and wife until on or about the 1st day of August, 1953.

The Respondant voluntarily abandoned me on or about August 1, 1953, completely without fault on my part and since said time we have not lived together nor in any way recognized each other as husband and wife.

There was born to our marriage two children, Alice Yvonne Graves, who is approximate six years of age and Dolly Ann Graves, who is approximately four years of age. Both of these minor children are now in my care, custody and control and have been in my care, custody and control since the Respondent and I separated in the year 1953. I am a fit and proper person to have the care, custody and control of the said minor children.

I do not have sufficient funds to support and maintain the two minor children and I believe that the respondent has sufficient income to pay me \$50.00 each month for the support and maintenance of the said minor children.

Josephine Graves

ORAL EXAMINATION

I, Alice L. Miller 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 her and she signed the same in the presence of myself and James R. Owen 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 _____ day of May, 19 58.

Alice L. Miller (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

JOSEPHINE GRAVES,

COMPLAINANT

vs.

RALPH L. GRAVES,

RESPONDENT

ORAL DEPOSITION

Filed _____, 19 _____

FILED
MAY 23 1958
ALICE J. DUCK, Clerk
_____, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register.

JOSEPHINE GRAVES,
Complainant,
vs.
RALPH L. GRAVES,
Respondent.

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

ANSWER AND WAIVER:

Now comes Ralph L. Graves, the Respondent in the above styled cause and waives notice of the filing of the Bill of Complaint in this cause, waives notice of the date set for hearing the said cause and consents and agrees that a final decree be rendered in said cause without further notice to him.

For answer to the Bill of Complaint the Respondent says:

1. He denies the allegations of the Bill of Complaint and demands strict proof thereof.

Ralph L. Graves
Respondent.

WITNESS:

Glenn L. Miller

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FILED

MAY 23 1958

ALICE J. DUCK, Clerk

JOSEPHINE GRAVES,
Complainant,
vs.
RALPH L. GRAVES,
Respondent.

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

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

Your Complainant, Josephine Graves, respectfully represents and shows unto the Court and your Honor as follows:

1. The Complainant and the Respondent are each over the age of twenty-one years and are bona fide resident citizens of Baldwin County, Alabama, and have both been bona fide resident citizens of said state and county for more than two years next preceding the filing of this Bill of Complaint.

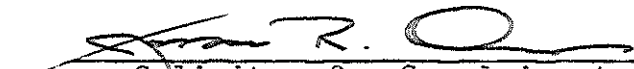
2. The Complainant and the Respondent were lawfully married in Baldwin County, Alabama, on or about, to-wit, the 30th day of June, 1951, and lived together as husband and wife until on, to-wit, the 1st day of August, 1953.

3. Complainant further avers that said Respondent voluntarily abandoned bed and board of said 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. That there was born of this marriage, two children, Alice Yvonne Graves, a daughter six years of age; Dolly Ann Graves, a daughter four years of age; that said minor children are in the care, custody and control of Complainant, who is a fit and proper person to have the said care, custody and control of the said minor children.

5. That Complainant is without funds to support and maintain the said two minor children and that the Respondents has a sufficient income to pay to Complainant the sum of Fifty Dollars (\$50.00) each month for the support and maintenance of the said children.

WHEREFORE, the premises considered, your Complainant makes the said Ralph L. Graves a party respondent to this Bill of Complaint, and in order that Complainant may have the relief hereinafter prayed for, may it please the court to cause the State's writ of subpoena to be issued, directed to the said Ralph L. Graves, commanding him to plead, answer or demur to this Bill of Complaint within the time required by law; and that on a final hearing of this cause, the court will make and enter a decree divorcing your Complainant from the Respondent, giving Complainant the permanent care, custody and control of the said minor children, ordering the Respondent to pay to the Complainant the monthly sum of \$50.00 for the support and maintenance of the said minor children and that your Honor will grant such other, further, different or general relief as may be just and proper, the premises considered.


Solicitor for Complainant.

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