(4306)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

DOROTHY B. STEADHAM FERGUSON, Complainant

vs.

DONIS R. FERGUSON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso 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 Dorothy B. Steadham Ferguson is forever divorced from the said Donis R. Ferguson for and on account of Cruelty.

IT IS FURTHER ORDERED ADJUDGED AND DECREED by the Court that the Complainant, Dorothy B. Steadham Ferguson, shall resume the use of her maiden name, Dorothy B. Steadham.

It is futher 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 futher ordered that Dorothy B. Steadham Ferguson the Complainant pay the cost herein to be taxed, for which executed may issue.

This 25 day of June 19 58

Hubert M Steele

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 the _____ day of _____, 19____

_____

Register of Circuit Court, In Equity.

No._____ Page_____

THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

DOROTHY B. STEADHAM FERGUSON

Complainant

vs.

DONIS R. FERGUSON

Respondent

DIVORCE DECREE

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: LOIS WILSON

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 Dorothy B. Steadham Ferguson and Patricia Ann Ferguson

a witness in behalf of Dorothy B. Steadham Ferguson in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Dorothy B. Steadham Ferguson

, Complainant

and Donis R. Ferguson

Respondent

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

Witness 14 day of June, 195 8

Alice J. Huck
Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

DOROTHY B. STEADHAM FERGUSON

Complainant

VS.

DONIS R. FERGUSON

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LOIS WILSON

FILED
JUN 14 1958
ALICE J. DUCK, Register

WITNESSES:

DOROTHY B. STEADHAM FERGUSON
PATRICIA ANN FERGUSON

ORAL DEPOSITION

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Dorothy B. Steadham Ferguson Complainant

VS.

Donis R. Ferguson Respondent

I, Lois Wilson

as Register and Commissioner

have called and caused to come before me Dorothy B. Steadham Ferguson and Patricia Ann Ferguson

witness ~~es~~ named in the Requirement for Oral Examination, on the 13th day of June 1958, at the office of C. LeNoir Thompson

in _____, Alabama, and having first sworn said Witness ____ to speak the truth, the whole truth, and nothing but the truth, the said Dorothy B. Steadham Ferguson and Patricia Ann Ferguson doth depose and say as follows:

That my name is Dorothy B. Steadham Ferguson, I am over the age of 21 and have been a resodent of the State of Alabama since birth. The Respondent Donis R. Ferguson is also over the age of 21 and has been a resident of the State of Alabama more than two years next preceding. We were married July 29, 1948 at De Funiak Springs, Florida, and lived together as husband and wife until our separation occurred on or about May 9, 1958. The cause of the separation being the Respondent struck and abused me on the date of the separation and prior occasions thereto. His treatment of me being so painful that I was placed in fear of my life or health and am afraid to live with him any longer as his wife. I know we will never live together again as husband and wife. A property settlement has been entered into and the agreement executed concerning this settlement is made a part of my testimony and is attached hereto. There are no children born as fruits of our marriage and none are expected. I respectfully ask this Honorable Court the right to resume the use of my maiden name, Dorothy B. Steadham.

Dorothy B. Ferguson

That my name is Patricia Ann Ferguson, I know both parties to this cause, they are both over the age of 21 and have been residents of the State of Alabama more than two years next preceding. They were married in DeFuniak Springs, Florida on or about July 29, 1948 and separated on or about May 9, 1958. The respondent on this occasion struck and abused the complainant placing her in fear of her life or health and she left him. The same had occurred on prior occasions but not as severely. They have no children as fruits of their marriage and I do not believe that they will ever live together again as husband and wife.

Patricia Ann Ferguson

ORAL EXAMINATION.

I, Lois Wilson, as Register and Commissioner hereby certify that the foregoing deposition s on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and C. LeNoir Thomoson at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; that I am not of counsel or 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 13th day of June, 1958.

Lois Wilson (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

DOROTHY B. STEADHAM FERGUSON

vs. Complainant

DONLS R. FERGUSON

Respondent.

Oral Deposition

Filed FILED, 195_

JUN 14 1958

ALICE J. DUCK, Register
Recorded in

, Register.

Record

Vol. _____ Page _____

, Register

8581. NOTE OF TESTIMONY

Printed by the Baldwin Times, Bay Minette, Alabama.

DOROTHY B. STEADHAM FERGUSON

vs.

DONIS R. FERGUSON

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, Testimony of Dorothy B. Steadham Ferguson and Patricia Ann Ferguson.

and in behalf of Defendant upon Answer and Waiver

Alice J. Nuck

Register.

C. LeDoir Thompson

No. .....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

DOROTHY B. STEADHAM FERGUSON

vs.

DONLS R. FERGUSON

NOTE OF TESTIMONY

Filed in Open Court this .....

day of FILED, 194 .....

JUN 14 1958

ALICE J. DUCK, Register Register.

Printed by the Baldwin Times

STATE OF ALABAMA
BALDWIN COUNTY

This agreement made and entered into on this the 12 day of June, 1958, by and between DOROTHY B. STEADHAM FERGUSON hereinafter referred to as the party of the first part, DONIS R. FERGUSON hereinafter referred to as party of the second part; WITNESSETH:

That, whereas, the parties hereto are husband and wife, having entered marriage at DeFuniak,Springs, Florida, on July 29,1948; and,

Whereas the parties hereto have concluded that under present conditions it is impossible to continue to live together as husband and wife;, and,

Whereas, the parties hereto have agreed to separate and to live separate and apart from this date forward; now therefore, in consideration of the premises and in further consideration of the mutual agreements hereinafter made, it is mutually agreed and understood as follows:

1. That the parties will henceforth live separate and apart and that neither party will in any way harass, embarass, intimidate, or in any way interfer with the private life of the other parties;

2. The party of the first part shall have, in lieu of alimony or support and maintenance, the 1956 Oldsmobile 88, Holiday Coupe, on which there is a balance due of about $600.00; and further the party of the first part shall have and keep as her own property all of the furniture purchased from the City Furniture Company in Prichard, Alabama, on which has a balance due of approximately $425.00.

3. The party of the second part hereby agrees to continue making payments on the automobile and furniture named above until such time as payments for the same are completed. The party of the first part in consideration for the party of the second party's agreement to finish paying for said automobile and furniture, does hereby release said party of the second part from any and all further claims by way of alimony, support and maintenance or otherwise.

4. In the event the party of the first part should proceed with her expressed intention to file suit for a divorce, the party of the second part hereby specifically denies that she has any grounds for divorce.

This agreement is made and entered into with the desire to

avoid any friction between the parties hereto and both parties hereto mutually agree and undertake to live up to the terms of this agreement as fully and completely as possible.

WITNESS our hands and seals this 12th day of June, 1958.

Dorothy B. Steadham Ferguson
Doris R. Ferguson

DOROTHY B. STEADHAM FERGUSON

COMPLAINANT

VS

DONLS R. FERGUSON

RESPONDENT

AGREEMENT

FILED
JUN 14 1958
ALICE J. DUCK, Register

DOROTHY B. STEADHAM FERGUSON	*	IN THE CIRCUIT COURT OF
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA
VS	*	IN EQUITY.
DONIS R. FERGUSON	*	CASE NO. _____
RESPONDENT	*	

Now comes the Respondent and accepted service of the summons and complaint in this cause.

The Respondent admits the allegations as the ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the complainant, the right to cross-examine complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Donis R. Ferguson

STATE OF ALABAMA
BALDWIN COUNTY

I, C. Dan Thompson a Notary Public, in and for said County, in said State, hereby certify that Donis R. Ferguson, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 11 day of June, 1958.

C. Dan Thompson
Notary Public, Baldwin County, Alabama.

DOROTHY B. STEADHAM FERGUSON

COMPLAINANT

VS

DONLS R. FERGUSON

RESPONDENT

* * * * * * * * * * * * * * * * * *

ANSWER AND WAIVER

* * * * * * * * * * * * * * * * * *

FILED
JUN 14 1958
ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons DONIS R. FERGUSON, 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 DOROTHY B. STEADHAM FERGUSON, as Complainant and against DONIS R. FERGUSON, as Respondent.

WITNESS my hand this the 14 day of June, 1958.

Alice J. Duck
Register.

* *

DOROTHY B. STEADHAM FERGUSON	*	IN THE CIRCUIT COURT OF
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA
VS	*	IN EQUITY.
DONIS R. FERGUSON	*	CASE NO. _____
RESPONDENT	*	

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

Your Complainant, Dorothy B. Steadham Ferguson, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and a resident of Baldwin County, Alabama, and has been more than two years next preceeding; The Respondent is over the age of 21 and a resident of Baldwin County, Alabama, and has been more than two years next preceeding.

2.

That your Complainant and the Respondent married at De Funiak Springs, Florida, on July 29, 1948, and lived together as husband and wife in Baldwin County, Alabama, until May 9, 1958.

3.

That on May 9, 1958, and on several ocassions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complaiaant every reasonable apprehension to believe and she did actually believe that if she continued to live with him he would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health.

There are no children as fruits of this marriage between your Complainant and Respondent, and there has been a property settlement made, copy of which is attached hereto and made a part hereof.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process make the said Donis R. Ferguson, 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; Your Complainant further prays that your Honor will upon a final hearing hereof, award to her a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent.

Complainant prays for such other, further, different or general relief as she may be entitled in the premises, etc.

Solicitor for the Complainant.

4306

DOROTHY B. STEADHAM FERGUSON

COMPLAINANT

VS

DONIS R. FERGUSON

RESPONDENT

* *

SUMMONS AND COMPLAINT

* *

FILED
JUN 14 1958
ALICE J. DUCK, Register