

(3506)

DIVORCE DECREE

PRINTED BY MOORE PTC CO.

The State of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

-----PATRICIA GRAVES-----, Complainant

vs.

-----JAMES G. GRAVES, JR.-----, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Personal Service 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

-----PATRICIA GRAVES----- is forever divorced from the said -----JAMES G. GRAVES, JR.----- for and on account of

Cruelty. It is further ORDERED, ADJUDGED AND DECREED by the Court that Complainant have and she is hereby granted custody and control of the five (5) minor children of this marriage, namely, Anita Graves, James G. Graves, III, William Graves, Katherine Graves and Lamar Graves, and she is hereby granted the sum of One Hundred Seventy-six Dollars (\$176.00) per month as alimony and for the support and maintenance of the minor children.

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 -----PATRICIA GRAVES----- the -----Complainant----- pay the cost herein to be taxed, for which executed may issue.

This 29th day of June, 1955
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 the ----- day of -----, 19-----

Register of Circuit Court, In Equity.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED
JUN 29 1955

ALICE J. DUCK, Register

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

PATRICIA GRAVES

Complainant

VS.

JAMES G. GRAVES, JR.

Respondent

I, Frances G. Mallory

as Register and Commissioner in Chancery

have called and caused to come before me Patricia Graves and Mildred Ross Rodriguez

witness es named in the Requirement for Oral Examination, on the day of June

194 55, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said Witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Patricia Graves and Mildred Ross Rodriguez doth depose and say as follows:

Testimony of Patricia Graves:

My name is Patricia Graves. I am over the age of twenty-one years and a bona fide resident citizen of Baldwin County, Alabama; that James G. Graves Jr., is over the age of twenty-one years and is a resident of Baldwin County, Alabama. We were married on March 11, 1946, and lived together as man and wife until around the middle of January, 1955, when it became impossible for me to longer live with him. On many occasions he has beat me with his fists so that I was in bad physical condition, and in addition, he has threatened to do me other and further physical harm, so much so that I am afraid to live with him. We have five (5) children, namely, Anita Graves, eight years of age, James G. Graves, III, seven years of age, William Graves, five years of age, Katherine Graves, three years of age, and Lamar Graves, one year of age, who are and have been in my care, custody and control. My husband, James G. Graves, Jr., is financially able to pay the sum of One Hundred Seventy-six Dollars (\$176.00) per month for the support and maintenance of the minor children above named, and for alimony.

Signed: Patricia Graves

Testimony of Mildred Ross Rodriguez:

My name is Mildred Ross Rodriguez. I am over the age of twenty-one years and a resident citizen of Baldwin County, Alabama. I am personally acquainted with Patricia Graves and James G. Graves, Jr. They are both residents citizens of Baldwin County, Alabama, and are both over the age of twenty-one years. They were married on March 11, 1946, and lived together as husband and wife until around the middle of January, 1955, at which time James G. Graves, Jr., struck and beat Patricia Graves with his fists, and has beaten and abused her on numerous occasions. They have not lived together as husband and wife since that time. They have five (5) children.

Signed: Mildred Ross Rodriguez

ORAL EXAMINATION.

I, Frances G. Mallory, as Register and Commissioner hereby certify that the foregoing deposition 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. G. Chason 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 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 29th day of June, 194 55.

Frances G. Mallory (L.S.)

NO. <u>3506</u>	PAGE
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY.	
PATRICIA GRAVES	
vs.	Complainant
JAMES G. GRAVES, JR.	
	Respondent.
Oral Deposition	
Filed <u>6-29</u> , 19 <u>45</u>	
<u>Charles F. Knecht</u> , Register.	Recorded in
Vol. _____	Page _____
Register.	Record

PATRICIA GRAVES

vs.

JAMES G. GRAVES, JR.

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, _____
Motion for Decree Pro Confesso on Personal Service, Decree Pro
Confesso on Personal Service and Testimony of Patricia Graves
and Mildred Ross Rodriguez

and in behalf of Defendant upon _____

[Signature]
Solicitor for Complainant

[Signature]
Register.

No. 3506

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

PATRICIA GRAVES

vs.

JAMES G. GRAVES, JR.

NOTE OF TESTIMONY

Filed in Open Court this 29th

day of June, 1945

Register.

Printed By The Baldwin Times

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

April 15, 1955

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint in the Divorce
action of Graves -vs- Graves.

Yours very truly,



C. G. Chason

CGC:fm

encls. 1

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: FRANCES G. MALLORY

KNOW YE: that we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine Patricia Graves and Mildred Ross Rodrigues

as witnesses in behalf of Patricia Graves in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Patricia Graves

_____, Complainant
and James G. Graves, Jr.

_____, Respondent

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

Witness 28th day of June, 195 5

W. J. [Signature]
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 3506

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

PATRICIA GRAVES, JR.

Complainant—

vs.

JAMES G. GRAVES, JR.

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

CIRCUIT COURT COMPLAINT

Printed by the Baldwin Times, Bay Minette, Alabama.

PATRICIA GRAVES
Complainant,
vs. JAMES G. GRAVES, JR.
Respondent.

In the Circuit Court.
In Equity No. 3506.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent

JAMES G. GRAVES, JR.

by the Sheriff of Baldwin County, on the 2nd day of May,
194 55.

And it further appears to the Register, that that the said

JAMES G. GRAVES, JR.

the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of C. G. CHASON Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said

JAMES G. GRAVES, JR.

This 28th day of June, 194 55.

Alice J. Haskett
Register.

No. 3506

RECORDED

CIRCUIT COURT OF
BALDWIN COUNTY,
ALABAMA.
IN EQUITY

PATRICIA GRAVES

Complainant,

Vs.

JAMES G. GRAVES, JR.

Respondent.

DECREE PRO CONFESSO ON
PERSONAL SERVICE.

Issued this 28 day of June
1945.

W. J. R. R. R. R. R.
Register.

THE BALDWIN TIMES

8600 Motion for Decree Pro Confesso on Personal Service.

3107 Code

MPCO.

THE STATE OF ALABAMA, }
Baldwin County } No. 3506 Circuit Court, In Equity.

PATRICIA GRAVES Complainant...

Vs.

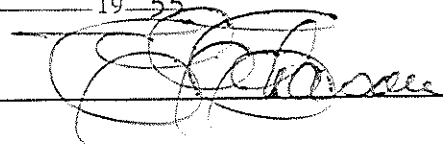
JAMES G. GRAVES, JR. Defendant....

Motion is hereby made for a Decree Pro Confesso against JAMES G. GRAVES, JR.

Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant... ha failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 28th day of June 19 55


Solicitor.

RECORDED

No. 3506

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

PATRICIA GRAVES

Vs.

JAMES G. GRAVES, JR.

Motion for Decree Pro Confesso on
Personal Service

Filed

19

FILED
JUN 12 1955

ALICE L. DOCK, Register

Record

Vol. Page

Register.

SUMMONS

Form 1531-3

McQuiddy Printing Co., Nashville, Tenn.

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon James G. Graves, Jr.

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State by

Patricia Graves

against James G. Graves, Jr.

Herein fail not. Due return make of this writ as the law directs.

Witness this 18th day of April 1955

Alice J. Duck, Register.

(Defendant is entitled to a copy of the bill on application to the Register.)

Code 1923-6523-6529

No. Page

The State of Alabama

..... COUNTY.

IN CIRCUIT COURT, IN EQUITY

vs.

SUMMONS

Returned by the Sheriff and filed in office, this
the day of, 19.....
....., Register.

Received in office, this the day of

....., 19.....

....., Sheriff.

I have executed the within by leaving a copy
thereof with.....

defendant named herein, on this the.....

day of, 19.....

....., Sheriff.

By....., Deputy.

PATRICIA GRAVES,

Complainant,

-vs-

JAMES G. GRAVES, JR.,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

BOOK 017 PAGE 362

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

Comes your Complainant, Patricia Graves, and files this her Bill of Complaint for divorce against James G. Graves, Jr., and respectfully represents and shows unto your Honor:

1. That the Complainant is over the age of twenty-one years and is a resident citizen of the State of Alabama, Baldwin County; that James G. Graves, Jr., is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

2. That the Complainant and the Respondent were lawfully married on, to-wit, March 11, 1946.

3. The Complainant further avers that the Respondent has committed actual violence on her person attended with danger to her life and health and from his conduct she is reasonably apprehensive of other and further violence, so much so that she can no longer live with the Respondent; that the Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her she is reasonable convinced that he will commit actual violence on her person attended with danger to her life or health.

4. Complainant further shows to the Court that there has been born of this marriage five (5) children, namely, Anita Graves, eight years of age, James G. Graves, III, seven years of age, William Graves, five years of age, Katherine Graves, three years of age, and Lamar Graves, one year of age. Complainant further shows the Court that these children are in her care, custody and control.

PRAYER FOR PROCESS AND RELIEF

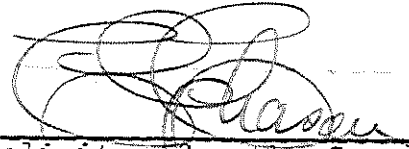
THE PREMISES CONSIDERED, Your Complainant prays that James

G. Graves, Jr., be made a party defendant of this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause that she be granted a divorce from the said Respondent, and that she be granted custody and control of the minor children hereinabove named. Complainant further prays that the Respondent be directed by the Court to pay the sum of One Hundred Seventy-six Dollars (\$176.00) per month for alimony, and the support and maintenance of the minor children hereinabove named. Should your Complainant be mistaken in the relief prayed for that she be granted such other, further and different and general relief to which she may be entitled and as in duty bound she will ever pray.

FILED

apr. 18 - 1933

ALICE J. DUCK, Clerk


Solicitor for the Complainant