

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Marie Quinley Waldrop

, Complainant

vs.

Alexander P. Waldrop

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and 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 Marie Quinley Waldrop is forever divorced from the said Alexander P. Waldrop for and on account of Voluntary abandonment

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 Alexander P. Waldrop the Respondent pay the cost herein to be taxed, for which executed may issue.

This 29th day of December 1958

Robert M. Ware

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

Marie Quinley Waldrop

Complainant

vs.

Alexander P. Waldrop

Respondent

DIVORCE DECREE

MARIE QUINLEY WALDROP
COMPLAINANT
VS
ALEXANDER P. WALDROP
RESPONDENT

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

Now comes the Respondent, in his own proper person, and admits the allegations contained in the bill of complaint filed in the above styled cause as to ages, residence and marriage, but denies all other allegations therein contained 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 examined Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Alexander P. Waldrop

STATE OF ALABAMA
BALDWIN COUNTY

I, Robert M. Brandy, a Notary Public, in and for said County, in said State, hereby certify that Alexander P. Waldrop, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that being informed of the contents of said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 24th day of December, 1958.

Robert M. Brandy
Notary Public, Baldwin County, Alabama

MARIE QUINLEY WALDROP

COMPLAINANT

VS

ALEXANDER P. WALDROP

RESPONDENT

ANSWER AND WAIVER

FILED

DEC 29 1958

ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon ALEXANDER P. WALDROP 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 MARIE QUINLEY WALDROP as Complainant and against ALEXANDER P. WALDROP, as Respondent.

WITNESS my hand this the 29 day of December, 1958.

Miss J. Duck
Register

MARIE QUINLEY WALDROP)	IN THE CIRCUIT COURT OF
COMPLAINANT)	BALDWIN COUNTY, ALABAMA,
VS)	IN EQUITY
ALEXANDER P. WALDROP)	
RESPONDENT)	

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

Your Complainant, Marie Quinley Waldrop, respectfully represents and shows unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is seventeen years of age and a bona fide resident citizen of Baldwin County, Alabama; that your Respondent is twenty years of age and a bona fide resident citizen of Baldwin County, Alabama.

2.

That your Complainant and Respondent were married at Lucedale, Mississippi, on September 1, 1956, and lived together as man and wife, in Baldwin County, Alabama, until September 2, 1956.

3.

That on September 2, 1956, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said Alexander P. Waldrop 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 practices of this Honorable Court.

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

Wilters & Brantley

BY:

Robert M Brantley
Solicitors for the Complainant

4465

MARIE QUINLEY WALDROP

COMPLAINANT

VS

ALEXANDER P. WALDROP

RESPONDENT

BILL OF COMPLAINT

FILED

DEC 29 1958

ALICE J. DUCK, Register

Marie Quinley Waldrop

vs.

Alexander P. Waldrop

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 Respondent and testimony of Marie Quinley Waldrop
and Clara Mae Walker.

Albert M. Brantley

and in behalf of Defendant upon _____

Allice J. Luck
Register.

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Marie Quinley Waldrop

vs.

Alexander P. Waldrop

NOTE OF TESTIMONY

Filed in Open Court this

day of

FILED

, 194

DEC 29 1958

ALICE J. DUCK, Register Register.

Printed by the Baldwin Times

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Evelun 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 Marie Quinley Waldrop and Clara Mae Walker

a witness in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Marie Quinley Waldrop

and Alexander P. Waldrop, Complainant

Respondent
on oath, to be by you administered, upon Marie Quinley Waldrop and Clara Mae Walker
to take and certify the deposition of the witness and return the same to our Court, with all con-
venient speed, under your hand.

Witness 29 day of Dec.

1958
Alice J. Luck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Marie Quinley Waldrop

Complainant

VS.

Alexander P. Waldrop

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

Marie Quinley Waldrop
Clara Mae Walker

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

Marie Quinley Waldrop COMPLAINANT

vs.

Alexander P. Waldrop RESPONDENT

I, Evelyn Watts

~~as Register and Commissioner~~

have called and caused to come before me Marie Quinley Waldrop and Clara Mae Walker

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

in Bay Minette, Alabama, and having first sworn said witness es to speak the

truth, the whole truth, and nothing but the truth, the said Marie Quinley Waldrop

and Clara Mae Walker doth depose and say as follows:

My name is Marie Quinley Waldrop. I am 17 years of age and a resident citizen of Fairhope, Alabama, and have so resided for the last 15 years. The Respondent, Alexander P. Waldrop is 20 years of age and a bona fide resident citizen of Daphne, Alabama.

Alexander and I were married to one another at Lucedale, Mississippi, on September 1, 1956, and lived together as man and wife one night and have not lived together or in anywise recognized one another as man and wife since that date. On September 2, the Respondent Alexander Waldrop, left me and has not returned to live with me since that time.

Marie Quinley Waldrop

My name is Clara Mae Walker. I live in Fairhope, Alabama and I am a good friend of Marie Quinley Waldrop. We are constant associates. I know of my own personal knowledge that Marie has not lived with Alexander nor recognized him as her husband for the past two years.

Clara Mae Walker

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 es and read over to them and they 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 es or had proof 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 29 day of December, 19 58

Evelyn Watts (L. S.)

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THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Marie Quinley Waldrop

COMPLAINANT

vs.
Alexander P. Waldrop

RESPONDENT

ORAL DEPOSITION

Filed

FILED

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ALICE J. DUCK, Register
RECORDED IN

Record

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Register.