

THE STATE OF ALABAMA, }  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. 2nd March, Term, 19 59FRANKIE VIRGINIA PUGH

Complainant

Vs.

LONNIE PUGH

Defendant

~~Motion is hereby made for a Decree Pro Confesso against~~

Lonnie Pugh

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 2nd day of March 19 59

746 Code

James M. Bailey Solicitor.Ughh

No. \_\_\_\_\_ Page \_\_\_\_\_

The State of Alabama,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

FRANKIE VIRGINIA PUGH

Complainant \_\_\_\_\_

Vs.

LONNIE PUGH

Defendant \_\_\_\_\_

Motion for Decree Pro Confesso  
on Publication

FILED

Filed \_\_\_\_\_ 19 \_\_\_\_\_

MAR 23 1959

CLERK  
REGISTER  
ALICE I. DUCK

Recorded in \_\_\_\_\_ Record \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

THE STATE OF ALABAMA, }

Baldwin County

CIRCUIT COURT, IN EQUITY

No. 2nd March, Term, 1959

FRANKIE VIRGINIA PUGH

Complainant

Vs.

LONNIE PUGH

Defendant

In this cause it appears to the Register Alice J. Duck that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 8th day of xxxx January, 1959, in the Fairhope Courier, a newspaper published in Fairhope, Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the 29th day of December, 1958 and

And it now further appearing to the Register Alice J. Duck, that the said Lonnie Pugh

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant, ordered and decreed by the Register Alice J. Duck that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Lonnie Pugh

This 2nd day of March, 1959

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Alice J. Duck Register.

No. \_\_\_\_\_

Page \_\_\_\_\_

**THE STATE OF ALABAMA,  
Baldwin County**

**CIRCUIT COURT, IN EQUITY**

FRANKIE VIRGINIA PUGH

Vs.

LONNIE PUGH

Decree Pro Confesso of Publication

Issued \_\_\_\_\_, 19\_\_\_\_

Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

FRANKIE VIRGINIA PUGH  
COMPLAINANT

vs.

LONNIE PUGH

RESPONDENT

I, Helen Bailey

as Register and Commissioner

have called and caused to come before me Frankie Virginia Pugh and Maggie Holliman

witnesses named in the requirement for Oral Examination, on the 4<sup>th</sup> day of March,  
19 59, at the office of Ernest M. Bailey, Attorney at Law,  
in Fairhope, Alabama, and having first sworn said witnesses to speak the  
truth, the whole truth, and nothing but the truth, the said Frankie Virginia Pugh and

Maggie Holliman

doth depose and say as follows:

My name is Frankie Virginia Pugh and I am the Complainant in the above matter. I am a bona fide resident of Baldwin County, Alabama and have been for more than one year next preceding the filing of this cause. I am over the age of twenty-one years and the Respondent is over the age of twenty-one years. To my knowledge the last known residency of the Respondent was in the State of Missouri.

The Respondent and I were married at Lucedale, Mississippi on May 23, 1953 and lived together as husband and wife until November, 1954. At that time the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time.

Frankie Virginia Pugh  
FRANKIE VIRGINIA PUGH

My name is Maggie Holliman. I am over the age of twenty-one years and am a bona fide resident of Baldwin County, Alabama. I know the Complainant in the above styled cause and know of my own personal knowledge that the Respondent voluntarily left the Complainant's bed and board on November, 1954 and has remained away voluntarily and continuously since that time.

Maggie Holliman  
MAGGIE HOLLIMAN

ORAL EXAMINATION

I, Helen Bailey 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 witnesses and read over to them and they signed the same in the presence of myself and Ernest M. Bailey at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proof made before me of the identity of said witnesses ; 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 4th day of March , 1959.

Helen Bailey (L. S.)

No. Page

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

FRANKIE VIRGINIA PUGH

COMPLAINANT

vs.

LONNIE PUGH

RESPONDENT

ORAL DEPOSITION

Filed , 19

, Register,

RECORDED IN

Record

Vol. Page

, Register.

FRANKIE VIRGINIA PUGH

vs.

LONNIE PUGH

THE STATE OF ALABAMA  
Baldwin CountyIN EQUITY  
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint,  
and oral testimony taken before Commissioner

and in behalf of Defendant upon publication

*James H. Bailey*  
Solicitor for Complainant

*W. J. Hester*  
Register.

M

No. ....

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**THE STATE OF ALABAMA**  
**Baldwin County**

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**IN EQUITY**  
Circuit Court of Baldwin County

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VS.

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**Note of Testimony**

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Filed in Open Court this 6 .....

day of May ....., 19 59

Reis J. Kunk  
Register.

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# The Fairhope Courier

E. B. GASTON ESTATE, PUBLISHER

P. O. BOX 268

Telephone WA8-9188 Established 1894

**JOB PRINTING**

Fairhope, Alabama February 2, 1959

Mrs. Alice J. Duck

Register

Bay Minette, Alabama

Legal notice to Hon. President  
Frankie Virginia Pugh vs  
Lonnice Pugh  
166 words - 4X  
Jan. 8-15-22-29

1079

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

FRANKIE VIRGINIA PUGH

, Complainant

vs.

LONNIE PUGH

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Publication 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 Frankie Virginia Pugh is forever divorced from the said Lonnie Pugh for and on account of 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 Frankie Virginia Pugh the Complainant pay the cost herein to be taxed, for which executed may issue.

This 6 day of March 1959.

*Robert M. Moore*

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.

121  
No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

FRANKIE VIRGINIA PUGH

Complainant

vs.

LONNIE PUGH

Respondent

**DIVORCE DECREE**

FILED

MAR 61 1958

ALICE J. DUCK, CLERK  
REGISTER

# The Fairhope Courier

Publishers and Printers

ESTABLISHED 1894

E. B. GASTON ESTATE, PUBLISHERS

P. O. BOX 268

PHONE WA8-9188

This is to certify that the  
attached legal notice appeared  
in The Fairhope Courier, a weekly  
newspaper published in the City of  
Fairhope, County of Baldwin, State  
of Alabama on the dates of Jan. 8 -  
15 - 22 - 29, 1959.

*Manue H. Crawford*

Editor

State of Alabama  
County of Baldwin

Sworn to and subscribed this 2nd

day of Feb A. D. 1959, before me.

*Alice J. Duck*  
Notary Public, Baldwin County

## FAIRHOPE, ALABAMA

"On Mobile Bay"

STATE OF ALABAMA,  
BALDWIN COUNTY.  
Frankie Virginia Pugh Com-  
plainant vs. Lonnie Pugh, Respond-  
ent.  
In The Circuit Court of Baldwin  
County, Alabama, in Equity:  
This the 29th day of December,  
1958.  
In this cause it being made to  
appear to the Clerk of this Court  
by the affidavit of Frankie Vir-  
ginia Pugh that the defendant,  
Lonnie Pugh is a non-resident of  
the State of Alabama and his place  
of residence is unknown, and fur-  
ther, that, in the belief of said  
affiant, the defendant is over the  
age of twenty-one years; it is,  
therefore, ordered that publica-  
tion be made in the Fairhope Cou-  
rier, a newspaper published in  
Fairhope, Baldwin County, Ala-  
bama, once a week for four conse-  
cutive weeks, requiring Lonnie  
Pugh, the said Respondent, to ans-  
wer or demur the Bill of Complain-  
ant in this cause by the 30th day  
of January, 1959, or after thirty  
days therefrom a decree Pro Con-  
fesso may be taken against him.  
Alice J. Duck, Register  
Ernest M. Bailey, Solicitor

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Helen Bailey

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 Frankie Virginia Pugh and Maggie Holliman

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Frankie Virginia Pugh

\_\_\_\_\_, Complainant  
and Lonnie Pugh

\_\_\_\_\_, Respondent

on oath, to be by you administered, upon Frankie Virginia Pugh and Maggie Holliman to take and certify the deposition<sup>s</sup> of the witness<sup>es</sup> and return the same to our Court, with all convenient speed, under your hand.

Witness 26th day of December, 1958

Beice J. ...  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No. \_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

**FRANKIE VIRGINIA PUGH**

Complainant \_\_\_\_\_

VS.

**LONNIE PUGH**

Defendant \_\_\_\_\_

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

**Helen Bailey**

**WITNESSES:**

**Frankie Virginia Pugh**

**Maggie Holliman**

STATE OF ALABAMA     )  
                              )  
BALDWIN COUNTY        )

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Lonnie Pugh to appear and plead, answer or demur, within thirty days from the service hereof, to a Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Frankie Virginia Pugh, Complainant, against Lonnie Pugh, Respondent.

Witness my hand this the 29 day of Dec., 1958.

Alice J. Luck  
REGISTER

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FRANKIE VIRGINIA PUGH,	Q	
Complainant	Q	IN THE CIRCUIT COURT OF
vs.		BALDWIN COUNTY, ALABAMA
LONNIE PUGH,	Q	IN EQUITY
Respondent	Q	

Comes your Complainant, Frankie Virginia Pugh, and files this her Bill of Complaint for divorce against Lonnie Pugh, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years, and that your Complainant is a resident citizen of Baldwin County, Alabama for more than one year next preceding the filing of this cause, and that the Respondent's last known residency, to the best of her knowledge and belief, was the State of Missouri, and that the Respondent's residency is otherwise unknown to her and cannot be ascertained by reasonable effort.

SECOND:

That the Complainant and Respondent were married on, to-wit, May 23, 1953 in Lucedale, Mississippi, and lived together as husband and wife until on, to-wit, November, 1954, when on account of the matters hereinafter complained of, your Complainant lived separate and apart from Respondent. Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, since which time Complaint and Respondent have not lived together nor in any way recognized each other as husband and wife.

THIRD:

That there was born of this marriage between Complainant and Respondent the following named child: Fay Jo Pugh, aged four years. That your Complainant is a fit and proper person to have the care, custody and control of the said minor child.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Lonnie Pugh be made a party defendant to this cause by the usual writ or process of this Honorable Court requiring him to appear and 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 Your Honor will award the Complainant custody and control of her minor child herein named; that Your Honor will grant unto Complainant an absolute divorce from said Respondent and will decree that the parties be allowed to remarry if they see fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

*Frankie Virginia Pugh*  
COMPLAINANT

STATE OF ALABAMA )

BALDWIN COUNTY )

Before me, the undersigned authority, personally appeared Frankie Virginia Pugh, the Complainant in the above styled cause, and avers that the allegations set out in the foregoing Bill of Complaint are true and correct.

*Frankie Virginia Pugh*  
FRANKIE VIRGINIA PUGH

SWORN and subscribed to before me this the 26<sup>th</sup> day of December, 1958.

*James M. Bailey*  
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

*filed*  
*Dec. 29, 1958*



4467

SUMMONS AND COMPLAINT

FRANKIE VIRGINIA PUGH,

Complainant

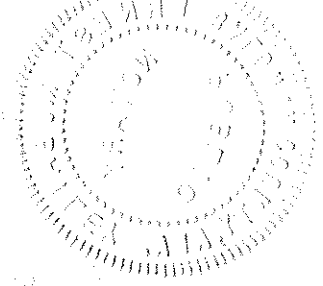
vs.

LONNIE PUGH,

Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED  
DEC 29 1958  
ALICE J. DUCK, Register



STATE OF ALABAMA

BALDWIN COUNTY

AFFIDAVIT AS TO RESIDENCY

Before me, the undersigned authority, personally appeared Frankie Virginia Pugh, who is known to me, and who, being by me first duly sworn, deposes and says:

That she is the Complainant in that certain action pending in the Circuit Court of Baldwin County, Alabama, wherein Frankie Virginia Pugh is the Complainant and Lonnie Pugh is the Respondent; that the last known residency of the said Respondent, Lonnie Pugh, was, to the best of her knowledge and belief, the State of Missouri; that the residency of the said Respondent is otherwise unknown to her and cannot be ascertained by reasonable effort; that the Respondent, Lonnie Pugh, is over the age of twenty-one years.

Frankie Virginia Pugh  
FRANKIE VIRGINIA PUGH

Sworn and subscribed to before me this 17<sup>th</sup> day of December, 1958.

Helen Bailey  
NOTARY PUBLIC, BALDWIN COUNTY, ALABAMA

*filed*  
*Dec. 29, 1958*  
*Cliff J. Luck, Reg.*

AFFIDAVIT AS TO RESIDENCY

FRANKIE VIRGINIA PUGH,

Complainant

vs.

LONNIE PUGH,

Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED

DEC 29 1958

ALICE J. DUCK, Register

NOTICE TO NON-RESIDENT

FRANKIE VIRGINIA PUGH,  
Complainant

STATE OF ALABAMA  
BALDWIN COUNTY


vs.

LONNIE PUGH,  
Respondent

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

This the 29th day of December, 1958.

In this cause it being made to appear to the Clerk of this Court by the affidavit of Frankie Virginia Pugh that the defendant, Lonnie Pugh, is a non-resident of the State of Alabama and his place of residence is unknown, and further, that, in the belief of said affiant, the defendant is over the age of twenty-one years; it is, therefore, ordered that publication be made in the Fairhope Courier, a newspaper published in Fairhope, Baldwin County, Alabama, once a week for four consecutive weeks, requiring Lonnie Pugh, the said Respondent, to answer or demur the Bill of Complaint in this cause by the 23rd day of January, 1959, or after thirty days therefrom a decree Pro Confesso may be taken against him.

  
ALICE J. DUCK, REGISTER

ERNEST M. BAILEY, Solicitor for Complainant.

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FRANKIE VIRGINIA PUGH,

Complainant

vs.

LONNIE PUGH,

Respondent

NOTICE TO NON-RESIDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY