

4497

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

LIDDIE JANE KEENAN

, Complainant

vs.

WILLIAM N. KEENAN JR.,

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ Answer & 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 Liddie Jane Keenan is forever divorced from the said William N. Keenan Jr., for and on account of Abandonment.

IT IS FURTHER ORDERED ADJUDGED AND DECREED, that the Complainant, Liddie Jane Keenan, shall have the permanent care, custody and control of the minor child, Valerie Kay Keenan, age about 3 years old.

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 Liddie Jane Keenan the Complainant pay the cost herein to be taxed, for which executed may issue.

This 4th day of February 1959

J 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.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

LIDDIE JANE KEENAN

Complainant

vs.

WILLIAM N. KEENAN JR.

Respondent

DIVORCE DECREE

FILED

FEB 14 1938

MIDGE A. DUCK, CLERK
REGISTER

LIDDIE JANE KEENAN

VS.

WILLIAM N. KEENAN Jr.,

THE STATE OF ALABAMA

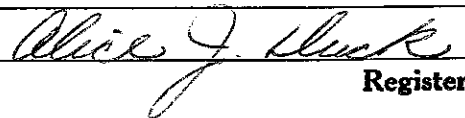
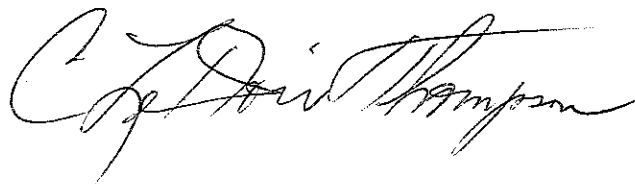
Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint,
Testimony of Liddie Jane Keenan and Ida B. Moberg.

and in behalf of Defendant upon Answer & Waiver.



Register.

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

LIDDIE JANE KEENAN

VS.

WILLIAM N. KEENAN, JR.,

Note of Testimony

Filed in Open Court this _____

day of **FILED** _____, 19____
FEB 2 1959

ALICE J. DJCK, Register Register.

MOORE PRINTING CO., BAY MINETTE, ALA.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

LIDDIE JANE KEENAN

COMPLAINANT

vs.

WILLIAM N. KEENAN, Jr.,

RESPONDENT

I, Lois Wilson

as Register and Commissioner

have called and caused to come before me Liddie Jane Keenan and Ida B. Moberg

witnesses named in the requirement for Oral Examination, on the 31st day of January

19 59 , at the office of C. LeNoir Thompson

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

truth, the whole truth, and nothing but the truth, the said Liddie Jane Keenan and

Ida B. Moberg

doth depose and say as follows:

That my name is Liddie Jane Keenan, I am over the age of 21 and a resident of the State of Alabama and have been more than two years next preceding. The Respondent is over the age of 21 and is a resident of the State of Alabama. We were married on July 10, 1954 at Waynesboro, Mississippi and the Respondent abandoned me without fault on my part on July 25, 1956. There was one child, Valerie Kay Keenan, age about 3 years born as fruits of our marriage. I have had her care, custody and control since birth and I respectfully represent that I am a fit, suitable and proper person to have her permanent care, custody and control and respectfully ask the court that this be granted. I know that we will never live together again as husband and wife and ask the court to grant me a divorce.

Liddie Jane Keenan

That my name is Ida B. Moberg, 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 2 years next preceding. They were married in Waynesboro, Mississippi on or about July 10, 1954 and the respondent abandoned the complainant without fault on her part. There was born as fruits of their marriage Valerie Kay Keenan age about 3 years. Liddie Jane Keenan has had the permanent care custody and control of this child since birth and I respectfully represent that she is a fit, suitable and proper person to have the permanent care, custody and control of this child. Since these parties will never live together again as husband and wife I respectfully suggest they be granted a divorce.

Ida B. Moberg

ORAL EXAMINATION

I, Lois Wilson 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 C. LeNoir Thompson 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 31st day of January , 19 59 .

Lois Wilson (L. S.)

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

LIDDIE JANE KEENAN

COMPLAINANT

vs.

WILLIAM N. KEENAN JR.

RESPONDENT

ORAL DEPOSITION

Filed

FILED

, 19

FEB 2 1959

ALICE J. DUCK, Register , Register.

RECORDED IN

Record

Vol.

Page

, Register.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon WILLIAM N. KEENAN JR., 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 LIDDIE JANE KEENAN, as complainant and against WILLIAM N. KEENAN, JR., as Respondent.

WITNESS my hand this the 2 day of February, 1959.


Register.

* * * * *

LIDDIE JANE KEENAN	*	IN THE CIRCUIT COURT OF
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA.
VS	*	IN EQUITY.
WILLIAM N. KEENAN JR.,	*	CASE NO. _____
RESPONDENT	*	

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

Your Complainant, Liddie Jane Keenan, 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 the State of Alabama and have been more than two years next preceding; The Respondent is over the age of 21 and is a resident of the State of Alabama, and has been more than two years next preceding.

2.

That your Complainant and the Respondent married at Waynesboro, Mississippi on July 10, 1954 and lived together as husband and wife in Alabama until on to-wit July 25, 1956.

3.

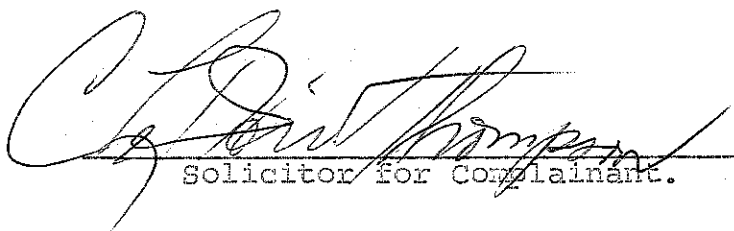
That on to-wit: July 25, 1956, while your Complainant and the Respondent were living together as husband and wife in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your complainant and has remained away voluntarily and continuously since that time.

4.

There was born as fruits of this marriage between the Complainant and the respondent one child: Valerie Kay Keenan, age about 3 years, and there is no property to be divided.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper procedure make the said William N. Keenan, Jr., 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 upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to the complainant the care, custody and control of the minor child, Valerie Kay Keenan, age about 3 years, Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for Complainant.

RECORDED 4497

EDDIE JANE KEENAN

COMPLAINANT

VS

WILLIAM M. KEENAN JR.,

RESPONDENT

* * * * *

SUMMONS AND COMPLAINT

* * * * *

FILED

FEB 2 1959

ALICE J. DUCK, Register

LIDDIE JANE KEENAN

COMPLAINANT

VS

WILLIAM N. KEENAN JR.,

RESPONDENT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA.

IN EQUITY.

CASE NO. _____

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

The Respondent admits the allegations as to 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.

William M. Keenan Jr.

STATE OF ALABAMA

COUNTY OF Montgomery

I, Jae P. Johnson, a Notary Public, in and for said County, in said State, hereby certify that William N. Keenan Jr., 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 27 day of January, 1959.

Jae P. Johnson
Notary Public

RECORDED

LIDDIE JANE KEENAN

COMPLAINANT

VS

WILLIAM N. KEENAN, JR.,

RESPONDENT

* * * * *

ANSWER AND WAIVER

* * * * *

FILED

FEB 2 1959

ALICE J. DUCK, Register

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 Liddie Jane Keenan and Ida B. Moberg.

a witness in behalf of Liddie Jane Keenan in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Liddie Jane Keenan

, Complainant

and William N. Keenan Jr.,

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 con-
venient speed, under your hand.

Witness 2nd day of Feb.

1959
Alice J. Duck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

LIDDIE JANE KEENAN

VS. Complainant

WILLIAM N. KEENAN JR.,

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LOIS WILSON

WITNESSES:

LIDDIE JANE KEENAN
IDA B. MOBERG

FILED
FEB 2 1959
ALICE J. DUCK, Register

4497