(3709)

DIVORCE DECREE

PRINTED BY MOORE PTG. CO.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

JAMES D. GOODWIN JR., Complainant

vs.

GRACE GOODWIN, 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 JAMES D. GOODWIN JR. is forever divorced from the said GRACE GOODWIN for and on account of Voluntary abandonment

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Respondent be and she is hereby awarded the custody of the minor child, Michael James Goodwin, subject to the right of visitation on the part of the Complainant at reasonable times.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the Court that the Complainant pay to the Respondent towards the maintenance and support of the said minor child, Michael James Goodwin, the sum of $40.00 per month, the first payment being due and payable on February 1, 1956.

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 JAMES D. GOODWIN JR. the Complainant pay the cost herein to be taxed, for which executed may issue.

This 26th day of January, 1956

Hubert M. Gray

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.

© GOES 115

No. 3209 Page

THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

Jan 23, 1956

8581. NOTE OF TESTIMONY 1M-7-46 Printed By The Baldwin Times

JAMES D. GOODWIN JR.

Complainant

vs.

GRACE GOODWIN

Respondent

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 and testimony of JAMES D. GOODWIN JR. and William Goodwin as set out in the oral deposition.

and in behalf of Defendant upon

James A. Hendrix

Alice J. Drake

Register.

No. 3709

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

JAMES D. GOODWIN JR.

Complainant

vs.

GRACE GOODWIN

Respondent

NOTE OF TESTIMONY

Filed in Open Court this .....

day of ..... FILED JAN 20 1956, 194.....

..... Register.

Printed By The Baldwin Times

ALICE [illegible], Register

COMMISSION TO TAKE DEPOSITIONS B.T.-500-11-54

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Gertrude M. Bankster

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 JAMES D.GOODWIN JR. and William Goodwin

a witnesses in behalf of JAMES D. GOODWIN JR. in a cause pending in our Circuit Court in Baldwin County, of said State, wherein JAMES D. GOODWIN JR. is

, Complainant

and GRACE GOODWIN is

Respondent

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

Witness 4 day of Jan, 1956

Register.

Commissioner's Fee, $

Witness' Fees, $

No. 3709

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JAMES D. GOODWIN JR.

Complainant

VS.

GRACE GOODWIN

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Gertrude M. Bankster

WITNESSES:

JAMES D. GOODWIN JR.

William Goodwin

ORAL DEPOSITION

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

JAMES D. GOODWIN JR. Complainant

VS.

GRACE GOODWIN Respondent

I, Gertrude M. Bankster

as ~~Register and~~ Commissioner

have called and caused to come before me JAMES D. GOODWIN JR. and William Goodwin

witness es named in the Requirement for Oral Examination, on the 4th day of January 1956, at the office of James A. Hendrix in Robertsdale, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said JAMES D. GOODWIN JR. and William Goodwin doth depose and say as follows:

My name is James D. Goodwin Jr. I am over twenty-one years old and have lived in Baldwin County, for more than the past two years. Grace Goodwin is over twenty-one years old and lives at 1545 Broadway, San Francisco, California. Grace and I were married July 3, 1954, at Petaluma, California. Grace voluntarily abandoned me of her own free will and accord on December 19, 1954, and since that time we have not lived together nor have we in any way recognized each other as husband and wife. We had one child a boy, Michael James Goodwin now about eleven months old, said child is now in the care and custody of its mother who is a fit and proper person to be awarded the care, custody, and control of said minor child. I am now in the Armed Forces of the United States and I am able to help provide for the support and maintenance of the said minor child Michael James Goodwin.

James D Goodwin Jr.

My name is William Goodwin, I am the brother of James D. Goodwin Jr. James is over 21 years old and has lived in Baldwin County for more than the past two years. Grace Goodwin is over 21 years old and resides at 1545 Broadway, San Francisco, California. James and Grace were married July 3, 1954 at Petaluma, California. On about December 19, 1954 Grace voluntarily abandoned James of her own free will and accord and since that time they have not lived together nor have they in any way recognized each other as husband and wife. They had one child a boy, Michael James Goodwin now about eleven months old, said child is now in the care and custody of its mother and that she is a fit and proper person to be awarded the care, custody, and control of Michael James Goodwin. James is now in the Armed Forces of the United States and is able to help provide for the maintenance and support of the said minor child Michael James Goodwin.

William Goodwin

ORAL EXAMINATION.

I, Gertrude M. Bankster, 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 Gertrude M. Bankster and James A. Hendrix 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 4th day of January, 1956.

Gertrude M. Bankster (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

JAMES D. GOODWIN JR.,

vs. Complainant

GRACE GOODWIN

Respondent.

Oral Deposition

Filed _____, 195____

_____, Register.

Recorded in

_____ Record

Vol. _____ Page _____

_____, Register

JAMES D. GOODWIN Complainant vs. GRACE GOODWIN Respondent	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

ANSWER AND WAIVER

Comes now the Respondent, GRACE GOODWIN, and for answer to the Bill of Complaint heretofore filed against her in said cause says as follows:

1. That she denies each and every allegation of the said Bill of Complaint and demands strict proof thereof.

And for further answer to said Bill of Complaint the Respondent hereby accepts service of a copy and notice of the filing of the said Complaint and hereby waives any further notice to her of the day set for hearing, the taking of testimony or the submission for final decree of the above styled cause and does here consent that the same may be submitted and testimony taken without further notice to her.

Grace Goodwin
GRACE GOODWIN

Sworn to and subscribed before me this the 9th day of January, 1956.

Ruth Callmann
Notary Public, San Francisco County, Calif.
My Commission Expires May 11, 1957

STATE OF ALABAMA)

BALDWIN COUNTY)

JAMES D. GOODWIN, JR. Complainant,	)	IN THE CIRCUIT COURT OF BALDWIN
vs.	)	COUNTY, ALABAMA, IN EQUITY.
GRACE GOODWIN Respondent.	)	

To the Honorable Judge of the Circuit Court of Baldwin County,

Sitting in Equity:

Comes now the Complainant, JAMES D. GOODWIN, humbly complaining of the Respondent, GRACE GOODWIN, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, JAMES D. GOODWIN, is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and has been a bona fide of said State for more than two years next preceeding the filing of this Bill of Complaint; that Respondent is over the age of twenty-one years and now resides at 1545 Broadway, San Francisco, California.

SECOND: That your Complainant and Respondent were lawfully married on or about, to-wit: July 3, 1953 at Petaluma, California.

THIRD: Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceeding the filing of this Bill of Complaint on to-wit: December 19, 1954 and since said time Complainant and Respondent have not lived together nor have they in any way recognized each other as husband and wife.

FOURTH: Complainant further avers that there was born of the union of the Complainant and Respondent one child, MICHAEL JAMES GOODWIN , a boy, now about eleven months old. That said child is now in the care, custody, and control of its mother, the Respondent. Further that Respondent is a fit and proper person to be awarded the care, custody, and control of said minor child, MICHAEL JAMES GOODWIN.

FIFTH: Complainant further avers that he is an able bodied man now serving in the Armed Forces of the United States; that he is able to provide, support, and maintenance for said minor child.

PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said GRACE GOODWIN be made party Respondent to this his Bill of Complaint and that a summons be issued and served upon her as required by law and the rules of this Honorable Court, and that she be required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said decree the Complainant will be granted the right to again contract marriage, that Your Honor will decree an amount to be paid by the Complainant to the Respondent each month for the support and maintenance of the minor child MICHAEL JAMES GOODWIN, born to the union of said parties, that by virtue of said decree the Respondent will be awarded the permanent care, custody and control of the said minor child, MICHAEL JAMES GOODWIN.

Complainant prays all other further and general relief to which he may be entitled, the premises considered and he will ever pray, ect.

Personally appeared before me JAMES D. GOODWIN, being known to me and being first duly sworn, deposes and says that he has read the allegations in the foregoing complaint and that to the best of his knowledge and belief said allegations are true in all respects.

James D. Goodwin Jr.

Sworn to and subscribed before me this
4th day of January, 1956

James A. Hendrix
Notary Public, Baldwin County, Alabama.