

(3743)

DIVORCE DECREE

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BOOK 021 PAGE 284

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

FRANK MOODY

Complainant

vs.

CAROLYN MOODY

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~XXXXXXXXXXXXXXXX~~

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

FRANK MOODY

is forever divorced from the

said

CAROLYN MOODY

for and on account of

Abandonment.

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 Frank Moody

the Complainant

pay the cost herein to be taxed, for which executed may issue.

This 9th day of April, 1956

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

APR 10 1956

ALICE J. DUCK, Register

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No.

..... TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Carolyn Moody

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

Carolyn Moody....., Defendant.....

by Frank Moody.....

....., Plaintiff.....

Witness my hand this 7th day of March 19 56

Wing J. Leuch....., Clerk

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021
PAGE
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No. _____ Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

Plaintiffs

vs.

Defendants

Summons and Complaint

Filed _____ 19____

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

FRANK MOODY,
Complainant,
-vs-
CAROLYN MOODY,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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

Your Complainant, Frank Moody, files this his Bill of Complaint for Divorce against Carolyn Moody, and respectfully represents and shows unto your Honor:

1. That Complainant is over the age of twenty-one years and is a resident of said State and County, and has been a bona fide resident of said State and County for more than one year next preceding the filing of this Bill of Complaint; that Carolyn Moody is a non-resident, her present address being 504 North Railroad Street, Adel, Georgia, and is over the age of twenty-one years.

2. That your Complainant and Respondent were lawfully married on, to-wit, June 17, 1953.

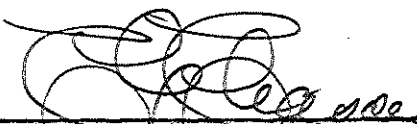
3. Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife. There were no children of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Carolyn Moody be made a party defendant to this cause by the usual process of this Honorable Court, by Registered Mail, requiring her 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 said cause he be granted a divorce from said Respondent. Should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, different and general relief to which he may be entitled and as

in duty bound he will ever pray.

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Solicitor for Complainant

FRANK MOODY,
Complainant,
-vs-
CAROLYN MOODY,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the Respondent in the above styled cause and accepts service of a Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

1. She admits the allegations contained in Paragraph 1 of said Bill of Complaint.
2. She admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. She denies each and every allegation contained in Paragraph 3 of said Bill of Complaint and demands strict proof thereof.

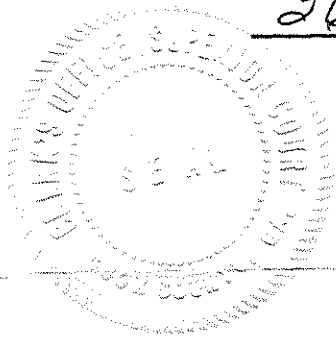
Carolyn Moody
Respondent

Sworn to and subscribed before me, a Notary Public, on this the

26 day of March, 1956.

D. J. [Signature] Clerk Superior Court,
Cook County, Georgia.

Madge Whitcomb
Notary Public, County of Cook
State of Georgia



FRANK MOODY

vs.

CAROLYN MOODY

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, and
Testimony of Frank Moody and James Lewis

and in behalf of Defendant upon Answer and Waiver

[Signature]
Subscribed for Complainant

[Signature]
Register.

No. 3743

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

FRANK MOODY

vs.

CAROLYN MOODY

NOTE OF TESTIMONY

Filed in Open Court this
day of 194.....

FILED
APR 19 1956

Register.

ALMOE L. MOODY, Clerk of Court

WALTER S. HAYES

Handwritten notes and signatures in the right margin.

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 Frank Moody and James Lewis

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

Frank Moody

Complainant

and Carolyn Moody

Respondent

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

Witness 9th day of April, 1956

[Signature]
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 3743

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

FRANK MOODY

Complainant—

vs.

CAROLYN MOODY

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

APR 5 1956

JAMES A. HUNTER, CLERK

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

FRANK MOODY Complainant

VS.

CAROLYN MOODY Respondent

I, Frances G. Mallory

as Register and Commissioner In Chancery

have called and caused to come before me Frank Moody and James Lewis

witnesses named in the Requirement for Oral Examination, on the ___ day of April
1956, 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 Frank Moody and James Lewis
doth depose and say as follows:

Statement of Frank Moody:

My name is Frank Moody. I am over the age of twenty-one years and
a bona fide resident citizen of Baldwin County, Alabama, having been
such a resident citizen for approximately two years. Carolyn Moody
is over the age of twenty-one years and is a resident of Adel, Georgia.
We were married on June 17, 1953, but she ^{voluntarily} abandoned my bed and board,
with no cause, more than a year ago, and we have not lived together,
nor in any way recognized each other as husband and wife, since that
time. There were no children of this marriage.

Signed: Frank moody

Statement of James Lewis:

My name is James Lewis. I am over the age of twenty-one years and
a resident of Baldwin County, Alabama. I am personally acquainted
with Frank Moody and Carolyn Moody. They were married in Nune of
1953, and lived together until over a year ago, at which time Carolyn
Moody voluntarily and with no cause, abandoned the bed and board of
Frank Moody, and they have not lived together, nor in any way recog-
nized each other as husband and wife, since that ~~kk~~ time. They are
both over the age of twenty-oneyears. There are no children of this
marriage.

Signed: James Lewis

ORAL EXAMINATION.

I, Frances G. Mallory, as Register and Commissioner hereby certify that the foregoing deposition son 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 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 9th day of April, 1956

Frances G. Mallory (L. S.)

NO. 3743 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

FRANK MOODY

vs. Complainant

CAROLYN MOODY

Respondent.

Oral Deposition

Filed _____, 195

Recorded in _____, Register, April 29 1956

Record

Vol. _____ Page _____

Register

CECIL G. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

April 7, 1956

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

Dear Mrs. Duck:

Enclosed herewith is Answer and Waiver, Testimony of Frank Moody and James Lewis, Commission to take Deposition, Note of Testimony and Final Decree of Divorce in the Divorce action of Moody-vs-Moody, along with my check in the amount of \$13.50 in payment of Costs of Court.

Yours very truly,



C. G. Chason

CGC:fm

encls. 5

CECIL G. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

March 5, 1956

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

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint for Divorce in
the case of Frank Moody -vs- Carolyn Moody.

Yours very truly,



C. G. Chason

CGC:fm

encls. 2