

4625

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

MERLE YVONNIE PIGGOTT COMPLAINANT

vs.

ANDREW L. LIGHT RESPONDENT

I, HAZEL A. WEEKLEY

as Register and Commissioner

have called and caused to come before me MERLE YVONNIE PIGGOTT and  
ROXIE LANGLEY

witness es named in the requirement for Oral Examination, on the 11 day of June  
19 59, at the office of C. LeNoir Thompson  
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 Merle Yvonnie Piggott and

Roxie Langley doth depose and say as follows:

My name is Merle Yvonnie Piggott. I'm over the age of 18 and have lived in Alabama all my life. The Respondent, Andrew L. Light, is over the age of 21 and is temporarily in Princess Anne County Va. We entered into a marriage ceremony at Bay Minette, Alabama, on October 3, 1958, and the Respondent abandoned me without fault on my part within a few hours and we never lived together as husband and wife following this ceremony. Under these circumstances there could be no fruits of this marriage and there was no property to be divided. The Respondent left me and said he would never be back. I was not 18 when I married.

Merle Yvonnie Piggott

My name is Roxie Langley. I know both parties to this cause. The Complainant is over the age of 18 and has lived in Alabama all her life. The Respondent is over the age of 21 and is presently residing in Princess Anne, Va. They entered into a marriage ceremony in Bay Minette, Alabama, on October 3, 1958 and a few hours later the Respondent left never to return. They did not live together as husband and wife and therefore there could be no children of this marriage. As far as I know there was no property to be divided. I do not believe they will ever live together as husband and wife.

Roxie Langley

I, Hazel Weekley 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 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 19 day of June, 19 59.

Hazel Weekley (L. S.)

No. 4625 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

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

**FILED**

Register.

JUN 19 1959  
RECORDED IN

ALICE J. DICK, CLERK  
REGISTER Record

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

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: HAZEL A. WEEKLEY

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

MERLE YVONNIE PIGGOTT and  
ROXIE LANGLEY

witnesses

a witness in behalf of Merle Yvonne Piggott in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein

MERLE YVONNIE PIGGOTT

, Complainant

and

ANDREW L. LIGHT

Respondent

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

Witness 19 day of

*James*  
*Andrew L. Light*  
\_\_\_\_\_  
Register.

, 1959

Commissioner's Fee, \$

Witness' Fees, \$

\_\_\_\_\_

\_\_\_\_\_

MERLE YVONNIE PIGGOTT

\_\_\_\_\_

vs.

\_\_\_\_\_

ANDREW L. LIGHT

\_\_\_\_\_

\_\_\_\_\_

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,  
 and oral testimony of:

\_\_\_\_\_

Merle Yvonne Piggott and

Roxie Landlev

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

and in behalf of Defendant upon answer and waiver.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

*C. L. Thompson*

*Wm. J. ...*

Register.

No. *4625*

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

VS.

Note of Testimony

Filed in Open Court this **FILED**

day of **AUG 19 1909**, 19

**MRS. J. DWAY** CLERK  
**MRS. J. DWAY** REGISTER Register.

MERLE YVONNIE PIGGOTT,  
COMPLAINANT

VS

ANDREW L. LIGHT  
RESPONDENT

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*  
\* IN EQUITY.  
\*  
\*  
\*  
\*  
\*  
\*

This cause coming on to be heard upon the Bill of Complaint, Answer and Waiver of Respondent and the Testimony as noted by the Register of the Court being satisfied therefrom that the averments of the Bill of Complaint are true and that the Complainant is entitled to the relief therein prayed.

IT IS THEREFORE ORDERED, CONSIDERED, ADJUDGED AND DECREED BY THE COURT that the purported marriage between Merle Yvonne Piggott and Andrew L. Light on the 3rd day of October, 1958, at Bay Minette, Alabama, be and the same is hereby annulled and declared for naught and that the said Merle Yvonne Piggott and Andrew L. Light be and they are hereby judicially ascertained to not be legally married to each other.

IT IS FURTHER CONSIDERED, ORDERED, ADJUDGED AND DECREED BY THE COURT, that the Complainant pay the costs in this cause incurred, for which let execution issue.

Dated at Bay Minette, Alabama, this 22 day of June, 1959.-

  
CIRCUIT JUDGE

THE COURT HAS CONSIDERED THE MATTER AND HAS DECIDED IN FAVOR OF THE PLAINTIFFS. THE COURT HAS ORDERED THAT THE DEFENDANT SHALL PAY TO THE PLAINTIFFS THE AMOUNT OF \$10,000.00 WITHIN THIRTY DAYS OF THE DATE OF THIS DECISION. THE COURT HAS ALSO ORDERED THAT THE DEFENDANT SHALL PAY TO THE PLAINTIFFS THE COSTS OF THIS SUIT. THE COURT HAS ORDERED THAT THE DEFENDANT SHALL PAY TO THE PLAINTIFFS THE INTEREST ON THE AMOUNT OF \$10,000.00 FROM THE DATE OF THIS DECISION TO THE DATE OF PAYMENT. THE COURT HAS ORDERED THAT THE DEFENDANT SHALL PAY TO THE PLAINTIFFS THE AMOUNT OF \$10,000.00 WITHIN THIRTY DAYS OF THE DATE OF THIS DECISION. THE COURT HAS ALSO ORDERED THAT THE DEFENDANT SHALL PAY TO THE PLAINTIFFS THE COSTS OF THIS SUIT. THE COURT HAS ORDERED THAT THE DEFENDANT SHALL PAY TO THE PLAINTIFFS THE INTEREST ON THE AMOUNT OF \$10,000.00 FROM THE DATE OF THIS DECISION TO THE DATE OF PAYMENT.

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**FILED**  
**JUN 22 1959**  
 ALICE J. DUCK, CLERK  
 REGISTER

4625

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ALICE J. DUCK, CLERK  
 REGISTER

MERLE YVONNIE PIGGOTT LIGHT \* IN THE CIRCUIT COURT OF  
 COMPLAINANT \* BALDWIN COUNTY, ALABAMA.  
 VS \* IN EQUITY.  
 ANDREW L. LIGHT \* CASE NO. \_\_\_\_\_  
 RESPONDENT \*

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.

*Andrew L. Light*

STATE OF *Virginia*  
 COUNTY OF *Princess Anne*

I, *Margaret M. Hood*, a Notary Public, in and for said County, in said State, hereby certify that Andrew L. Light, 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 the instrument he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the *23* day of *May*, 1959.

*Margaret M. Hood*  
 Notary Public,  
 My Comm. Expires Dec. 26, 1960.

*Please send me a copy of  
 the Divorce I have just*

*Andrew L. Light*





TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons ANDREW L. LIGHT 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 MERLE YVONNIE PIGGOTT, and against ANDREW L. LIGHT as Respondent.

WITNESS my hand this the 19 day of June, 1959.

Merle Yvonne Piggott  
Register

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MERLE YVONNIE PIGGOTT	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA.
COMPLAINANT	)	
	)	IN EQUITY.
VS	)	
	)	
ANDREW L. LIGHT	)	
	)	
RESPONDENT	)	

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

Your Complainant, MERLE YVONNIE PIGGOTT, respectfully represents unto your Honor and this Honorable Court as follows:

-1-

That your Complainant is now over 18 years of age and is a bona fide resident of Baldwin County, Alabama, and the Respondent, ANDREW L. LIGHT, is 21 years of age and is presently residing in Princess Anne, County, Va.

-2-

That your Complainant and the Respondent went through a marriage ceremony at Bay Minette, Alabama, on October 3, 1958.

-3-

That no consent was given by either of the Petitioner's parents.

-4-

That shortly after going through the ceremony the Respondent left the Complainant, never to return and the Complainant was forced to return to live with her people.

-5-

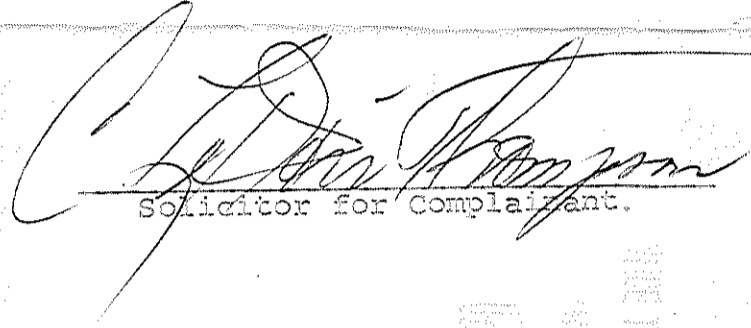
There are no children born of fruits of this marriage and there is no property involved.

PRAYER

WHEREFORE the premises considered your Petitioner prays that your Honor will by proper procedure make the said ANDREW L. LIGHT part 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.

The Complainant further prays that upon final hearing hereof your Honor will grant to her a decree annulling and declaring void the ceremony entered into as alleged herein, and your Complainant prays for such other, further, different, or general relief that she may, in Equity and good conscience be entitled to receive.

  
Solicitor for Complainant.

RECEIVED  
JUN 24 1914  
COURT HOUSE  
MEMPHIS, TENN.

4625

Sum. & Compt

RECEIVED  
JUN 22 1959  
ALICE J. DUCK, CLERK REGISTER

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JUN 22 1959

ALICE J. DUCK, CLERK REGISTER