

4630

DIVORCE DECREE

MOORE PRINTING COMPANY - EAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Willie Mae Ratliff, Complainant

vs.

Russell Ratliff, 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 Willie Mae Ratliff is forever divorced from the said Russell Ratliff for and on account of

Cruelty. IT IS FURTHER ORDERED, ADJUDGED AND DECREED, BY THE COURT, that the Complainant's mother, Mrs. Catherine Stewart, be and she is hereby awarded the care, custody and control of Joan Elaine Ratliff, John Russell Ratliff, and Todd Raymond Ratliff, subject to the right of the Complainant and Respondent to visit them and have them visit them at reasonable times and for reasonable periods of time; IT IS FURTHER ORDERED, ADJUDGED AND DECREED, THAT the Respondent be and he is hereby awarded the care, custody and control of the minor child, Curtis Lyle Ratliff subject to the right of the Complainant to visit him and have him visit her at reasonable times. IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the court, that the Respondent pay to Mrs. Catherine Stewart the sum of Fifteen (\$15.00) Dollars per week for the maintenance and support of the minor children.

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

This 25 day of June 1959

Robert 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.

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THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Willie Mae Ratliff

Complainant

vs.

Russell Ratliff

Respondent

DIVORCE DECREE

FILED

JUN 25 1959

ALICE L. DUCK, CLERK  
REGISTER

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons RUSSELL RATLIFF 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 WILLIE MAE RATLIFF, as Complainant and against Russell Ratliff, as Respondent.

WITNESS my hand this the 25 day of June, 1959.

  
Register

WILLIE MAE RATLIFF	)	
	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA,
VS	)	IN EQUITY
RUSSELL RATLIFF	)	
	)	
RESPONDENT	)	

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

Your Complainant, Willie Mae Ratliff, respectfully represents unto Your Honor and this honorable Court as follows:

1.

That your Complainant is over the age of 21 years, and a resident citizen of Baldwin County, Alabama, and have been for more than one year next preceeding the filing of the Bill of Complaint; that the Respondent is over the age of 21 years and a resident of the State of New York.

2.

That your Complainant and the Respondent married at Pascagoula, Mississippi, on December 17, 1951, and lived together as husband and wife, until on to-wit, August 15, 1957.

3.

That on, to-wit, August 15, 1957, and on various occasions prior thereto, the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent four children, Joan Elaine Ratliff, age 6; John Russell Ratliff, age 5; Curtis Lyle Ratliff, age 4 and Todd Raymond Ratliff, age 2; That the Respondent is a fit and proper person to have the care, custody and control of the minor child Curtis Lyle Ratliff; that the complainant and Respondent have entered into a separation agreement whereby the Complainant's mother, Mrs. Catherine Stewart, shall the care, custody and control of the three minor children, Joan Elaine Ratliff, John Russell Ratliff and Todd Raymond Ratliff; that she is a fit and proper person to have their care, custody and control;

5.

That the Complainant and the Respondent did this day enter into a separation agreement and a copy is attached hereto and marked Exhibit "A", and made a part of this complaint as if herein fully set out.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Russell Ratliff 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 prays that upon a final hearing hereof, Your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that your Respondent be awarded the care, custody and control of the minor child, Curtis Lyle Ratliff; that your Complainant's mother, Mrs. Catherine Stewart, be awarded the care, custody and control of the three minor children, Joan Elaine Ratliff, John Russell Ratliff and Todd Raymond Ratliff; Your Complainant further prays that the attached separation agreement be made a part of the decree; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY: 

Solicitors for the Complainant

WILLIE MAE RATLIFF  
COMPLAINANT  
VS  
RUSSELL RATLIFF  
RESPONDENT

BILL OF COMPLAINT

FILED  
JUN 25 1959  
ALICE J. DUCK, CLERK  
REGISTER

THE STATE OF ALABAMA,

BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

Willie Mae Ratliff

COMPLAINANT

vs.

Russell Ratliff

RESPONDENT

I, Evelyn Watts

as Register, ~~and Commissioner~~

have called and caused to come before me Willie Mae Ratliff and Mrs. Catherine Ratliff

witness ES named in the requirement for Oral Examination, on the 25 day of June 1959, at the office of Wilters & Brantley

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 Willie Mae Ratliff and Mrs. Catherine Ratliff

doth depose and say as follows:

My name is Willie Mae Ratliff. The Respondent and I are both over the age of twenty-one years. He is a resident of the State of New York and I am a resident of the State of Alabama. We were married on the 17th day of December, 1951, in Pascagoula, Mississippi. We lived together as husband and wife until August 15, 1957. As a result of our marriage we had four children, Joan Elaine Ratliff age 6, John Russell Ratliff, age 5, Curtis Lyle Ratliff, age 4, and Todd Raymond Ratliff age 2.

That on to-wit, August 15, 1957, and on various occasions prior thereto he cursed, threatened and abused me and threatened to do actual violence to my person, which would necessarily endanger my life and health; that the conduct of the Respondent was such as to give me everly reasonable apprehension to believe and I did actually believe that if I continued to live with him he would do actual violence to my person, which would necessarily endanger my life and health.

The Respondent and I have come to an agreement as to the care, custody and control of our children. We have agreed that he is to have the care, custody and control of Curtis Lyle Ratliff and I believe he is a fit and proper person to do the same. We have also agreed that my mother Mrs. Catherine Stewart, is to have the care, custody and control of Joan Elaine Ratliff, John Russell Ratliff and Todd Raymond Ratliff, and she is a fit and proper person to have the care, custody and control of these children. I am now living with my mother in Baldwin County, Alabama. The Respondent has agreed to pay \$15.00 aweek to my mother to care for the three children.

Willie Mae Ratliff

My name is Catherine Stewart and the Complainant is my dauther. I know that she and the Respondent have not gotten along together and their married life has not been satisfactory. I know of the agreement which they have entered into and I believe that it is the most satisfactory under the circumstances.

Cathur Stewart

I, Evelyn Watts 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 Harry J. Wilters, Jr. 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 25 day of June, 1959

Evelyn Watts (L. S.)

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

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**IN CIRCUIT COURT, IN EQUITY**

Willie Mae Ratliff

COMPLAINANT

vs.

Russell Ratliff

RESPONDENT

**ORAL DEPOSITION**

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

Register.

RECORDED IN

Record

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

**FILED**

Page \_\_\_\_\_

Register.

JUN 25 1959

ALICE I. DICK, CLERK  
REGISTER

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County



Circuit Court

TO: Evelyn Watts

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 Willie Mae Ratliff and Mrs. Catherine Stewart

a witness in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Willie Mae Ratliff is

, Complainant

and Russell Ratliff is

Respondent

on oath, to be by you administered, upon Willie Mae Ratliff and Mrs. Catherine Stewart to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 25 day of

*James Lewis*, 1957  
Register.

Commissioner's Fee, \$

Witness' Fees, \$



No.

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

WILLIE MAE RATLIFF

Complainant

VS.

RUSSELL RATLIFF

FILED

Defendant

JUN 25 1959

COMMISSION TO TAKE DEPOSITION

ALICE L. DUCK, CLERK  
REGISTER

COMMISSIONER:

Evelyn Watts

WITNESSES:

Willie Mae Ratliff  
Mrs. Catherine Stewart

Willie Mae Ratliff

vs.

Russell Ratliff

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 of Respondent, separation agreement and testimony of Willie Mae Ratliff and Mrs. Catherine Stewart.

and in behalf of Defendant upon

*Willie Mae Ratliff*  
*Plaintiff*

*W. J. ...*  
Register.

m

No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

Willie Mae Ratliff

vs.

Russell Ratliff

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of ....., 194

**FILED**

**JUN 25 1959**

**ALICE D. DICK, CLERK  
REGISTER**

Printed by the Baldwin Times

WILLIE MAE RATLIFF  
COMPLAINANT  
VS  
RUSSELL RATLIFF  
RESPONDENT

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

Now comes the Respondent, in his own proper person, and admits the allegations contained in the Bill of Complaint filed in the above styled cause as to ages, residences, marriage and children, but denies all other allegations contained therein, 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.

Russell J. Ratliff

STATE OF ALABAMA  
BALDWIN COUNTY

I, Walter M. Brantley, a Notary Public, in and for said County, in said State, hereby certify that Russell Ratliff, 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 said instrument, he executed the same voluntarily on the day the same bears date

Given under my hand and seal on this the 25 day of June, 1959.

Walter M. Brantley  
Notary Public, Baldwin County, Ala.

WILLIE MAE RATLIFF  
COMPLAINANT  
VS  
RUSSELL RATLIFF  
RESPONDENT

ANSWER AND WAIVER

FILED

JUN 25 1959

ALICE L. DUCK, CLERK  
REGISTER

WILLIE MAE RATLIFF

COMPLAINANT

VS

RUSSELL RATLIFF

RESPONDENT

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

This agreement made and entered into on this the 25<sup>th</sup> day of June, 1959, by and between Willie Mae Ratliff hereinafter referred to as the Complainant and Russell Ratliff, hereinafter referred to as the Respondent, WITNESSETH:

WHEREAS, the parties hereto have been husband and wife for a period of 8 years and as a result of such union have four children, Joan Elaine Ratliff, age 6, John Russell Ratliff age 5, Curtis Lyle Ratliff age 4 and Todd Raymond Ratliff age 2; and

WHEREAS said parties have definitely concluded that under conditions now existing it is impractical for them to live together as man and wife.

NOW, THEREFORE, in consideration thereof, and of the mutual agreements hereinafter made, they have mutually agreed to a complete separation under the express terms and conditions.

1. The said parties would entirely and completely separate as man and wife, live separate and apart, and neither party hereinafter shall in any way harrass, threaten, intimidate or otherwise act in any way so as to embarrass or humiliate the other party.

2. That the Respondent shall have the custody, control and care of the minor child, Curtis Lyle Ratliff, and that the Complainant shall have the right to visit and have the child to visit her at reasonable times and for reasonable periods.

3. That the Complainant and the Respondent have mutually agreed that the Complainant's mother, Mrs. Catherine Stewart, shall have the care, custody and control of the other three minor children, Joan Elaine Ratliff, John Russell Ratliff and Todd Raymond Ratliff, and the Complainant and the Respondent shall have the right to visit and have the said children visit them at reasonable times and for reasonable periods.

4. The Respondent agrees to pay the Complainant's mother, Mrs. Catherine Stewart, the sum of FIFTEEN (\$15.00) DOLLARS per week for the maintenance and support of the three minor children.

5. The Complainant and the Respondent agrees that in the event Mrs. Stewart becomes unable to care for the children, the Respondent is to have the care, custody and control the the minor children.

This agreement has been made and executed by the parties here to on the date and day hereinfirst above set forth, in good faith, with full understanding of all its provisions and with the mutual promise on the part of each to comply therewith faithfully and completely.

Willie Mae Raliff

Russell J. Raliff

Catherine Stewart

WITNESSES

Robert M. Brance

Evelyn Watts

4630

WILLIE MAE RATLIFF

COMPLAINANT

VS

RUSSELL RATLIFF

RESPONDENT

SEPARATION AGREEMENT

FILED

JUN 25 1959

ALICE J. DUCK, CLERK  
REGISTER