

(4239)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

JOSEPH D. LAFLAM

Complainant

vs.

SARAH EUGENIA LAFLAM

Respondent

Amended complaint

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

Joseph D. LaFlam

is forever divorced from the

said Sarah Eugenia LaFlam for and on account of

cruelty.

Elizabeth Sarah Eugenia LaFlam, the minor child of the parties who was born since the filing of the suit, is hereby

placed in the care, custody and control of her mother, Sarah Eugenia LaFlam, except for such periods of time when such mother may be required to have medical treatment, during which period of

time E. F. Sanders and Elizabeth Sanders, the maternal grandparents shall be awarded temporary care, custody and control of such child

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 Joseph D. LaFlam

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

This 18th day of August 19 59

H. M. Dale

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

AUG 18 1959

ALICE J. DUCK, CLERK  
REGISTER

JOSEPH D. LA FLAM,	I	
Complainant,	I	IN THE CIRCUIT COURT OF
vs.	I	
	I	BALDWIN COUNTY, ALABAMA
SARAH EUGENIA LA FLAM,	I	
Respondent.	I	IN EQUITY
	I	

Comes your Complainant, Joseph D. La Flam and files this his Bill of Complaint for divorce against Sarah Eugenia La Flam, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years and are both resident citizens of Baldwin County, Alabama, and that they have been such residents all of their lives except for a short period of time when the Complainant was employed in St. Louis, Missouri.

SECOND:

That your Complainant and the Respondent were married on heretofore, to-wit: April 6, 1958, and lived together as man and wife until, on account of the matters hereinafter complained of, your Complainant was compelled to leave the Respondent and live separate and apart from her; that on, to-wit: March 15, 1959, and on several previous occasions thereto the Respondent has committed actual violence on the person of your Complainant by striking him with her fists, tearing his clothes, biting him and from her conduct he had reasonable apprehension to believe and he does believe that if he continued to live with her that his life and health would be endangered.

PRAYER FOR PROCESS AND RELIEF

The premises considered, your Complainant prays that the above named Sarah Eugenia La Flam be made a party Defendant to this cause by the usual writ or process of this Honorable Court requiring her to appear and 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 this cause that Your Honor will grant unto your Complainant an absolute

divorce from said Respondent and that Your Honor will also decree that the Complainant be allowed to remarry if he sees fit. Should your Complainant be mistaken in the relief prayed for, that there be granted to him such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.

Joseph D. LaPlante  
Complainant

CHASON & STONE

Solicitors for Complainant

*Filed March 17, 1959*

*Ex - March 21, 1959*

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Sarah Eugenia La Flam 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 Joseph D. La Flam as Complainant, against Sarah Eugenia La Flam, as Respondent.

Witness my hand this 17 day of March, 1959.

  
\_\_\_\_\_  
Register

JOSEPH D. LaFLAM,	§	
Complainant,	§	IN THE CIRCUIT COURT OF
v.	§	BALDWIN COUNTY, ALABAMA,
SARAH EUGENIA LaFLAM,	§	
Respondent.	§	In Equity, No. 4530

Comes the respondent in the above styled cause and demurs to the bill of complaint heretofore filed against her therein, upon the following separate and several grounds, to-wit:

1. There is no equity in the bill.

2. Because the bill does not allege that the violence to complainant's person was attended with danger to his life or health on the one hand, nor does it allege, on the other hand, that respondent's conduct was such as to create a reasonable apprehension on the part of complaint that respondent would commit actual violence upon the complainant's person in the future, attended with danger to his life or health.

3. Because the allegations of cruelty are insufficient in both of their alternatives as alleged, first, in that it is not alleged or shown by the bill that the alleged actual violence was attended with danger to complainant's life or health, and second, in that it is not alleged or shown by the bill that from respondent's conduct, complainant had reasonable apprehension to believe or does believe that if he continued to live with her she would commit such actual violence upon his person in the future as would be attended with danger to his life or health.

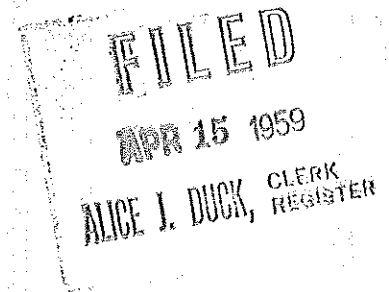
HAMILTON, DENNISTON, BUTLER & RIDDICK

*[Signature]*  
Solicitors for Respondent

Address: 912 First National Bank Bldg.,  
Mobile, Alabama

*Filed*  
*April 15, 1959*  
*Alice J. Duck,*

4532



copy mailed to  
Chazant & Stone



JOSEPH D. LA FLAM,

Complainant,

vs.

SARAH EUGENIA LA FLAM,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes the Complainant in the above styled cause and amends paragraph "SECOND" of the Bill of Complaint heretofore filed in said cause so that the same shall read as follows:

SECOND:

That your Complainant and the Respondent were married on heretofore, to-wit: April 6, 1958, and lived together as man and wife until, on account of the matters hereinafter complained of the Complainant was compelled to leave the Respondent on March 15, 1959, and live separate and apart from her; that on, to-wit: March 15, 1959, the Respondent committed actual violence on the person of your Complainant, attended with danger to his life or health by striking him with her fists and tearing his clothes. On previous occasions the Respondent had committed actual violence on the person of your Complainant by biting him and striking him with her fists. From the conduct of such Respondent the Complainant had reasonable apprehension that if he continued to live with her his life or health would be in danger.

CHASON & STONE

By: Chas. Y. Stone  
Solicitors for Complainant



JOSEPH D. LA FLAM,  
Complainant,  
vs.

SARAH EUGENIA LA FLAM,  
Respondent.

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

\*\*\*\*\*

AMENDMENT TO BILL OF COMPLAINT

\*\*\*\*\*

FILED

APR 16 1953

ALICE K. BUCK, CLERK  
REGISTERED

JOSEPH D. LA FLAM,	X	
Complainant,	X	IN THE CIRCUIT COURT OF
vs.	X	BALDWIN COUNTY, ALABAMA
SARAH EUGENIA LA FLAM,	X	IN EQUITY
Respondent.	X	

WAIVER AND ANSWER

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 one of said bill of complaint.

2. She admits that your complainant and respondent were married heretofore, to-wit; April 6, 1958.

3. She denies each and every allegation contained in the second paragraph of said bill of complaint and demands strict proof thereof.

Your respondent further adverbs, represents and shows unto your Honor that since the filing of said bill of complaint that there has been born to said marriage on, to-wit: the 27th day of June, 1959, a daughter named Elizabeth Sarah Eugenia, which child is and has been under the care, custody, control and support of your respondent and that your respondent and said minor child has been living with your respondent's parents, E. F. Sanders and Elizabeth Sanders at Foley, Alabama. That your respondent and the said E. F. Sanders and Elizabeth Sanders are of good moral character and prudent, are ready, willing and financially able to care for said minor child and it is

to the best interest of said minor child to reside with your respondent and the said E. F. Sanders and Elizabeth Sanders.

That your respondent is emotionally upset at the present time and may have to be gone for a short period of time for rest and treatment.

Now, therefore, your petitioner and respondent prays that your Honor will grant her care, custody and control of said minor child, Elizabeth Sarah Eugenia, and that during any necessary absence for rest and treatment, that your Honor will grant care, custody and control to the said E. F. Sanders and Elizabeth Sanders, who have assisted her in caring for said child since its birth (and prior thereto); and that your Honor will grant such other, further and different relief as on to your Honor may seem just and proper, and your complainant will ever pray, etc.

*Filed*  
*8-18-59*  
*Alice J. Luck*

*Forest A. Christian*  
\_\_\_\_\_  
Forest A. Christian, Solicitor for  
Respondent, Sarah Eugenia La Flam

JOSEPH D. LA FLAM,  
Complainant,

vs.

SARAH EUGENIA LA FLAM,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY  
NO. 4530

WAIVER AND ANSWER

Filed 8-18-59  
Alice French  
Register



THE STATE OF ALABAMA,  
BALDWIN COUNTY

## Circuit Court

To Wallace E. HarrellAttorney at LawBrunswick, Georgia

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 Joseph D. La Flam

as witnesses in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Joseph D. La Flam

\_\_\_\_\_ Complainant

and Sarah Eugenia La Flam

\_\_\_\_\_ Respondent

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

Witness 31 day of July, 19 59

Walter J. Winkler  
Register

Commissioner's Fee, \$ 10.00

Witness' Fees, \$ \_\_\_\_\_



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

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

JOSEPH D. LA FLAM

Complainant

VS.

SARAH EUGENIA LA FLAM

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Wallace E. Harrell

WITNESSES:

Joseph D. La Flam

HAMILTON, DENNISTON, BUTLER & RIDDICK

PETER HAMILTON (1838-1888)  
THOMAS A. HAMILTON (1844-1897)  
J. GAILLARD HAMILTON (1899-1956)

THOMAS A. HAMILTON  
ROBERT P. DENNISTON  
CHARLES R. BUTLER  
HARRY H. RIDDICK  
ROBERT P. LOCKLIN

MILLER A. WIDEMIRE

ATTORNEYS & COUNSELLORS AT LAW  
FIRST NATIONAL BANK BUILDING  
P. O. BOX 1671

MOBILE, ALABAMA

April 13, 1959

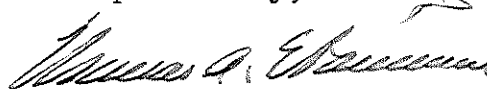
Mrs. Alice J. Duck, Register  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

RE: LaFlam v. LaFlam -  
No. 4530 in Equity

We enclose herewith original and copy of demur-  
rers of the respondent, which we should appreciate your  
filing for us in the above styled cause, having the copy  
thereof served upon Messrs. Chason & Stone, solicitors  
for complainant in said cause.

Yours respectfully,



For the Firm

TAH:lh  
No. 12,527

HAMILTON, DENNISTON, BUTLER & RIDDICK

PETER HAMILTON (1838-1888)  
THOMAS A. HAMILTON (1844-1897)  
J. GAILLARD HAMILTON (1899-1956)  
THOMAS A. HAMILTON  
ROBERT P. DENNISTON  
CHARLES R. BUTLER  
HARRY H. RIDDICK  
ROBERT P. LOCKLIN  
MILLER A. WIDEMIRE

ATTORNEYS & COUNSELLORS AT LAW  
FIRST NATIONAL BANK BUILDING  
P. O. BOX 1671  
MOBILE, ALABAMA

May 18, 1959

Mrs. Alice J. Duck, Register,  
Circuit Court of Baldwin County  
Bay Minette, Alabama

Dear Mrs. Duck:

RE: LaFlam v. LaFlam, No. 4530 in Equity

Please enter a notation of our withdrawal as solitors for the respondent in the above styled cause. We have notified Mrs. LaFlam of our withdrawal.

Thanking you, we are

Yours respectfully,



For the Firm

TAH:lh  
No. 12,527

cy to Mr. John Chason

Mrs. Sarah Eugenia LaFlam

Mr. Frank E. Sanders

4530

NO. 10017 - FEB. 14 - 1951

THE  
FEDERAL BUREAU OF INVESTIGATION  
UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D. C.

TO : DIRECTOR, FBI  
FROM : SAC, NEW YORK  
SUBJECT: [illegible]

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THE STATE OF ALABAMA }  
Baldwin County }

Circuit Court of Baldwin County, Alabama,  
(In Equity)

JOSEPH D. LA FLAM

COMPLAINANT

vs.

SARAH EUGENIA LA FLAM

RESPONDENT

I, Wallace E. Harrell

~~XXXXXX~~ Commissioner

have called and caused to come before me Joseph D. La Flam

witness named in the requirement for Oral Examination, on the 6 day of August

1959, at the office of Bennet, Gilbert, Gilbert & Whittle

in Brunswick, Georgia, ~~XXXXXX~~, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Joseph D. La Flam

doth depose and say as follows:

My name is Joseph D. La Flam and I am the Complainant in that certain suit filed in the Circuit Court of Baldwin County, Alabama, In Equity, in which Sarah Eugenia La Flam is the Respondent, said cause being a suit for divorce. I am over the age of twenty-one years and I am a resident citizen of Baldwin County, Alabama, where I have resided all of my life except for a short period of time when I was employed at St. Louis, Missouri, and at the present time, as I am now employed at Sea Island, Georgia. The Respondent is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama. I married Sarah Eugenia La Flam on April 6, 1958, and we lived together as man and wife until March 15, 1959, when I was compelled to leave her and live separately and apart from her. On March 15, 1959, Sarah Eugenia La Flam committed actual violence on my person attended with danger to my life or health by striking me with her fist and tearing my clothes. On previous occasions she had committed actual violence on my person by biting me and striking me with her fists. From her conduct I had reasonable apprehension that if I continued to live with her my life and health would be in danger. I have not lived with her as man and wife since March 15, 1959.

Joseph D. La Flam



I, Wallace E. Harrell ~~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— and read over to him and he signed the same in the presence of myself and Richard M. Scarlett at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness— or had proof made before me of the identity of said witness—; 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 6 day of August, 1945.

Wallace E. Harrell (L. S.)

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

JOSEPH D. LA FLAM

COMPLAINANT

vs.

SARAH EUGENIA LA FLAM

RESPONDENT

ORAL DEPOSITION

Filed 8-18, 1945

Richard M. Scarlett, Register.  
RECORDED IN

Record

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

Register

JOSEPH D. LAFLAM

VS.

SARAH EUGENIA LAFLAM

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN EQUITY  
CIRCUIT COURT OF BALDWIN COUNTY

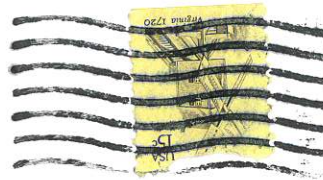
This cause is submitted in behalf of Complainant upon the original Bill of Complaint, amended Bill  
of Complaint and Testimony of Joseph D. LaFlam

and in behalf of Defendant upon Answer and Waiver

*W. J. Luck* Register.

*W. J. Luck*  
Solicitors for Complainant

Mrs E. J. Sanders  
Box 63  
Foley AL 36536



Mrs Eunice Tindal  
Po Box 489  
Bay Minette AL 36507

"Howie Hall"  
The E. J. Sanders  
Foley, Alabama 36535 Po box 63  
Dec 8, 1980

Please send copy of divorce decree  
Jo Laflam vs Sarah Eugenia Laflam.

Enclosed is money order for \$1.25

yours truly,  
Sarah Eugenia Laflam

Po Box 63

Foley AL 36536

CIRCUIT COURT  
BALDWIN CO., ALA.  
**FILED**

DEC 9 1980

EUNICE G. TINDAL  
REGISTER

JOSEPH D. LA FLAM,

Complainant,

vs.

SARAH EUGENIA LA FLAM,

Respondent.

Y

Y

Y

Y

Y

Y

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

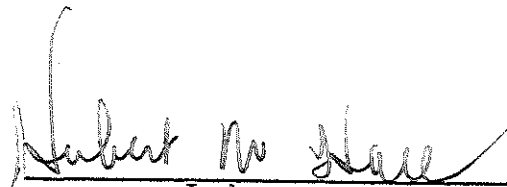
IN EQUITY

NO. 4530

This matter coming on to be heard on the Demurrer to the Bill of Complaint as amended and the Court having considered the same is of the opinion that the demurrer should be overruled.

It is, therefore, ORDERED, ADJUDGED and DECREED by the Court that the Demurrer to the Bill of Complaint as amended be, and the same is, hereby overruled.

Done this the 16th day of June, 1959.

  
Judge

4530

4530

FILED

JUN 18 1959

ALICE L. DUCK, CLERK  
REGISTER