

41651

DOROTHY PAULINE ROBINSON,     |

Complainant                     |

- vs. -                             |

DUDLEY ROBINSON,             |

Respondent                     |

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

STIPULATED AGREEMENT

This stipulated agreement, made and entered into by and between the parties this the 14<sup>th</sup> day of July, 1959, WITNESSETH:

1. That the Complainant shall have the full care, custody and control of the minor child of their marriage, i. e., Wallace Eugene Robinson, and the said Complainant agrees to support, maintain and educate the said minor child so long as she shall have such care, custody and control of the said minor child. The parties further agree that should the Respondent be called upon to provide support for the said minor child or to pay any debts other than as set out in this agreement, then, and in that event, the Respondent shall be entitled to have the full care, custody and control of the minor child. It is further agreed that until such time as the care, custody and control of the minor child shall be placed in the Respondent, the Respondent shall have no rights of visitation to or with the said minor child.

2. The parties have heretofore disposed of all their jointly held real property and shall each be entitled to his or her personal effects, absolute and forever.

3. The Respondent, Dudley Robinson, does hereby agree to assume and pay the indebtedness incurred by the parties at the Bank of Fairhope.

It is further understood and agreed that this agreement may be used by either party filing for divorce proceedings and that all its terms may be submitted to the Court having jurisdiction thereof for its approval and confirmation and may become a part of any decree rendered by said Court having jurisdiction over the same.

FILED

JUL 21 1959

ALICE J. DUCK, Register

Dorothy Robinson  
COMPLAINANT

Dudley Robinson  
RESPONDENT

STATE OF ALABAMA        )  
                                  )  
BALDWIN COUNTY         )

I, the undersigned notary public in and for said state and county, certify that Dorothy Pauline Robinson and Dudley Robinson, whose names are signed to the foregoing instrument and who are known to me, acknowledged before me on this day that, being informed of the contents of the instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 14<sup>th</sup> day of July, 1959.

My commission expires June 10, 1962.

*Helen Bailey*  
NOTARY PUBLIC

**FILED**

JUL 21 1959

ALICE J. DUCK, Register

DOROTHY PAULINE ROBINSON,

Complainant

versus

DUDLEY ROBINSON,

Respondent

STIPULATED AGREEMENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

DOROTHY PAULINE ROBINSON,

Complainant

vs.

DUDLEY ROBINSON,

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

ANSWER AND WAIVER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof separately and severally, says:

1. Respondent admits the allegations of the First Paragraph of the Bill of Complaint.

2. Respondent admits the allegations of the Second Paragraph of the Bill of Complaint as to the date of marriage and date of separation but denies all other allegations of this Paragraph and demands strict proof of the same.

3. Respondent admits the allegations of the Third Paragraph of the Bill of Complaint.

Respondent hereby accepts service of a copy of the Summons and Complaint in this cause and waives further service of the same. The Respondent also waives notice of taking of testimony in this cause and notice of submission of said cause and agrees that the testimony may be taken and the cause submitted without further notice to him.

*Dudley Robinson*  
DUDLEY ROBINSON

EXECUTED IN THE PRESENCE OF:

*Ernest M. Bailey*

FILED

JUL 21 1959

ALICE J. DUCK, Registrar

DOROTHY PAULINE ROBINSON,

Complainant

versus

DUDLEY ROBINSON,

Respondent

ANSWER AND WAIVER

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

DOROTHY PAULINE ROBINSON

Complainant

vs.

DUDLEY ROBINSON

Respondent

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 taken before commissioner \_\_\_\_\_

and in behalf of Defendant upon Answer and Waiver \_\_\_\_\_

*[Signature]*  
SOLICITOR FOR COMPLAINANT

*[Signature]*  
Register.

No. ....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

DOROTHY PAULINE ROBINSON

Complainant

vs.

DUDLEY ROBINSON,

Respondent

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of **FILED**, 194

JUL 21 1959

ALICE J. DUCK, Register.  
Register.

Printed by the Baldwin Times

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

DOROTHY PAULINE ROBINSON, Complainant

vs.

DUDLEY ROBINSON, 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 Dorothy Pauline Robinson is forever divorced from the said Dudley Robinson for and on account of Cruelty. It is further ORDERED, ADJUDGED AND DECREED by the Court that the full care, custody and control of the minor child, Wallace Eugene Robinson shall be vested in Complainant and that the Stipulated Agreement attached hereto and made a part hereof is hereby ratified and confirmed.

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

This 21 day of July 1959.

Hubert M. Hance

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 day of 19

Register of Circuit Court, In Equity.



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No. ----- Page -----

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

DOROTHY PAULINE ROBINSON

Complainant

vs.

DUDLEY ROBINSON

Respondent

**DIVORCE DECREE**

FILED  
JUL 21 59  
SAGE I. DICK, CLERK  
REGISTER

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

DOROTHY PAULINE ROBINSON, Complainant

vs.

DUDLEY ROBINSON, 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 Dorothy Pauline Robinson is forever divorced from the said Dudley Robinson for and on account of Cruelty. It is further ORDERED, ADJUDGED AND DECREED by the Court that the full care, custody and control of the minor child, Wallace Eugene Robinson shall be vested in Complainant and that the Stipulated Agreement attached hereto and made a part hereof is hereby ratified and confirmed.

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

This 21 day of July 1959.

[Signature] 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.

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

DOROTHY PAULINE ROBINSON,

COMPLAINANT

vs.

DUDLEY ROBINSON,

RESPONDENT

I, Helen Bailey

as Register and Commissioner in the above styled cause

have called and caused to come before me Dorothy Pauline Robinson

witness named in the requirement for Oral Examination, on the 21<sup>st</sup> day of July,  
1959, at the office of Ernest M. Bailey

in Fairhope, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Dorothy Pauline Robinson

doth depose and say as follows:

TESTIMONY OF DOROTHY PAULINE ROBINSON:

My name is Dorothy Pauline Robinson and I am the Complainant in the above styled cause. The Respondent and I were married on January 10, 1948 in Indianapolis, Indiana and lived together until 1957 when we were divorced because of his cruelty toward me. Following that time, we attempted a reconciliation and were remarried. On July 12, 1959 and on numerous occasions prior to that date since our remarriage, the Respondent has threatened violence upon my person and has abused me. I am of the opinion that if I continue to live with him as his wife he will commit actual violence upon my person and may injure me permanently.

*Dorothy Pauline Robinson*  
DOROTHY PAULINE ROBINSON

ORAL EXAMINATION

I, Helen Bailey 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 her and she signed the same in the presence of myself and Ernest M. Bailey, Attorney at Law, 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 21<sup>st</sup> day of July, 1959.

Helen Bailey (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

DOROTHY PAULINE ROBINSON,  
COMPLAINANT

vs.

DUDLEY ROBINSON,  
RESPONDENT

ORAL DEPOSITION

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

FILED

JUL 21 1959

ALICE J. DICK  
RECORDS & DEEDS  
BALDWIN

Register.

Record

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

Register.

STATE OF ALABAMA  
BALDWIN COUNTY

¶  
¶

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Dudley Robinson to appear and plead, answer or demur, within thirty days from the service of this writ to the Bill of Complaint filed in the Circuit Court, in Equity, of said county and state, by Dorothy Pauline Robinson, as Complainant, against Dudley Robinson, as Respondent.

Witness my hand this the 21 day of July, 1959.

*Miss J. Luck*  
REGISTER

DOROTHY PAULINE ROBINSON, ¶

Complainant ¶

vs. ¶

DUDLEY ROBINSON, ¶

Respondent ¶

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Comes your Complainant, Dorothy Pauline Robinson, and files this her Bill of Complaint for divorce against Dudley Robinson, and shows unto this Honorable Court and unto Your Honor as follows:

FIRST:

That your Complainant and Respondent are over the age of twenty-one years and are resident citizens of Fairhope, Baldwin County, Alabama for more than one year next preceding the filing of this cause.

SECOND:

That your Complainant and Respondent were married on, heretofore, to-wit, January 10, 1948 in Indianapolis, Indiana, and lived together as husband and wife until on, to-wit, July 12, 1959, when, on account of the matters hereinafter complained of, Complainant was forced to live separate and apart from Respondent; that on July 12, 1959 and at times prior thereto, the Complainant states that the Respondent, from his manner and conduct towards her, gave reasonable apprehension of committing violence upon her person, and that from his manner and conduct towards her, she is certain that if she continues to live with him as his wife, he will commit actual violence upon her

person, attended with danger to her life and health.

THIRD:

That there was born of this marriage between Complainant and Respondent one child, Wallace Eugene Robinson, aged eleven years; that the Complainant is a fit and proper person to have the care, custody and control of the said minor child. That your Complainant and the Respondent have heretofore entered into an agreement disposing of their real and personal property, a copy of which agreement is attached hereto and made a part hereof.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Dudley Robinson be made a party defendant to this cause by the usual writ or process of this Honorable Court requiring him 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 Your Honor will award unto the Complainant the full care, custody and control of the said minor child; that Your Honor will grant unto your Complainant an absolute divorce and will decree that the parties be allowed to remarry if they see fit, and that Your Honor will ratify and confirm the attached agreement between the parties disposing of their property. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

FILED

JUL 21 1959

ALICE J. DUCK, Register

*Eugene M. Bailey*  
SOLICITOR FOR COMPLAINANT

4651

DOROTHY PAULINE ROBINSON,

Complainant

versus

DUDLEY ROBINSON,

Respondent

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

FILED

JUL 21 1959

ALICE J. DUCK, Register

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Helen Bailey

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 DOROTHY PAULINE ROBINSON

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Dorothy Pauline Robinson

\_\_\_\_\_ , Complainant

and Dudley Robinson

\_\_\_\_\_ Respondent

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

Witness 21<sup>st</sup> day of July, 1959

Alma J. Weeks  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

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



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

**THE STATE OF ALABAMA  
Baldwin County**

**CIRCUIT COURT**

DOROTHY PAULINE ROBINSON

Complainant

VS.

DUDLEY ROBINSON

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

Helen Bailey

WITNESSES:

Dorothy Pauline Robinson

**FILED**

JUL 21 1959

ALICE J. DUCK, Register

4651

*[Faint, illegible text, possibly a signature or stamp]*

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