

4667

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

WANDA MAE GRAHAM, Complainant

vs.

BENJAMIN F. GRAHAM, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Dece-As-Confess~~ 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 Wanda Mae Graham is forever divorced from the said Benjamin F. Graham for and on account of

CRUELTY

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 Benjamin F. Graham the Respondent pay the cost herein to be taxed, for which executed may issue.

This 20 day of April 1960

H. 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_____

FILED

APR 20 1960

ALICE J. DUCK, CLERK REGISTER

Register of Circuit Court, In Equity.

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

WANDA MAE GRAHAM

COMPLAINANT

vs.

BENJAMIN F. GRAHAM

RESPONDENT

I, RUTH K. HOWELL

as Register and Commissioner

have called and caused to come before me Wanda Mae Graham and Susie Mae Steadman

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

19 , at the office of

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

truth, the whole truth, and nothing but the truth, the said Wanda Mae Graham

and Susie Mae Steadman doth depose and say as follows:

My name is Wanda Mae Graham, the Complainant in this case. I am over 21 years of age and my husband, B. F. Graham is over 21 years of age and we live in Bay Minette, Alabama. On March 2, 1959 we were married in Brewton, Ala. We lived together as husband and wife until June 6, 1959 on that day my husband B. F. Graham threatened to kill me and struck me with his hands. I am afraid he will hurt me or kill me. I left him on that day and we have not lived together as husband and wife since that time.

Wanda Mae Graham

My name is Susie Mae Steadman. I am over the age of 21 years and I live in Monroe County Alabama near Monroeville. B. F. Graham who is the respondent in this case is my brother. I know that he and Wanda Mae Graham did not get along at all. They were married in Brewton, Alabama in 1959. My brother hit here several times and I think that if they lived together they would have more disagreements and he would probably hurt her. They separated in June of 1959 and have not lived together since. They have no children.

Susie Mae Steadman

ORAL EXAMINATION

I, RUTH K. HOWELL 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 them and they signed the same in the presence of myself and 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 20th day of April, 1960.

Ruth K. Howell (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

Filed _____, 19 _____

RECORDED IN

Register,
Record

Vol. _____ Page _____

Register,

WANDA MAE GRAHAM

COMPLAINANT

vs.

BENJAMIN F. GRAHAM

RESPONDENT

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 depositions of Wanda Mae Graham and Susie Mae Steadman

and in behalf of Defendant upon answer and waiver

Walter H. ...
ATG for complainant

Alicia J. Duck
Register.

M

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

WANDA MAE GRAHAM

COMPLAINANT

VS.

BENJAMIN F. GRAHAM

RESPONDENT

Note of Testimony

Filed in Open Court

FILED

day of _____ **APR 20** 19**60**, 19_____

ALICE J. DUKY CLERK
ALICE J. DUKY REGISTER

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County



Circuit Court

TO: RUTH K. HOWELL

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 WANDA MAE GRAHAM

a witness in behalf of COMPLAINANT in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein WANDA MAE GRAHAM is

, Complainant

and BENJAMIN F. GRAHAM is

Respondent

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

Witness 30 day of April

, 1960.

Alice J. Duck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

WANDA MAE GRAHAM

vs. Complainant

BENJAMIN F. GRAHAM

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

WANDA MAE GRAHAM

Complainant

VS

BENJAMIN F. GRAHAM

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: _____

.....

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

Comes now your Complainant, Wanda Mae Graham, and humbly complaining against Benjamin F. Graham, Respondent, respectfully shows unto your Honor:

I

That your Complainant and Respondent are each over the age of 21 years and are bona fide residents of Baldwin County, Alabama and that they have been residents of Baldwin County, Alabama for more than two (2) years next preceeding the filing of this bill of complaint.

II

That they were married on May 2, 1959, in Brewton, Alabama and lived together as husband and wife until June 6, 1959; that there were no children born of this marriage.

III

That on to-wit June 6, 1959 and many times prior thereto and since said marriage, the said Benjamin F. Graham committed actual violence to her person by striking her with his hands attended with danger to her life and health or from his conduct and threats toward her at said time there was and is grave danger that he would commit such violence.

WHEREFORE your Complainant prays that this Honorable Court will take the jurisdiction of the cause made by this bill of complaint and make the said Benjamin F. Graham, party Respondent hereto, and by appropriate process require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court; and Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this Complainant and Respondent and Complainant prays for such other, further or different relief as in equity and good

conscience she shall be entitled.

Wanda Mae Graham
Complainant

Wilson Hayes
Solicitor for Complainant

Sworn to and subscribed before me this the 3rd day of July
_____, 1959.

FILED
JUL 31 1959
ALICE J. DUCK, Register

Wilson Hayes
Notary Public, State of Alabama at Large

4667

FILED
JUL 31 1959
ALICE J. DUCK, Register

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 4667

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Comanded to Summon BENJAMIN F. GRAHAM

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.....

BENJAMIN F. GRAHAM....., Defendant.....

by WANDA MAE GRAHAM....., Plaintiff.....

Witness my hand this 31 day of July 19 59

Exp 8-1-59

Alice J. Luck....., Clerk

The State of Alabama
Baldwin County

CIRCUIT COURT

WANDA MAE GRAHAM

Plaintiffs

vs.

BENJAMIN F. GRAHAM

Bay Minette

Defendants

Summons and Complaint

Filed July 31, 1959

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

July 31 1959

_____, Sheriff

I have executed this summons

this 8-1 1959

by leaving a copy with

Benj. F. Graham

Ray W. Walker Sheriff

W. A. Albert Deputy Sheriff

B. M. M.

WANDA MAE GRAHAM
 Complainant,
 Vs.
BENJAMIN F. GRAHAM
 Respondent.

In the Circuit Court.
 In Equity No. 4667.

DECREE PRO CONFESSO ON PERSONAL SERVICE

In this cause, it appears to the Register, that service was had on the Respondent _____

Benjamin F. Graham

by the Sheriff of Baldwin County, on the 1st day of August
19 59.

And it futher appears to the Register, that the said _____

Benjamin F. Graham

_____ the Respondent, having to the date hereof,
 failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
 on motion of Wilson Hayes Solicitors
 for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
 and it hereby is, in all things taken as confessed against the said _____

Benjamin F. Graham

This 19 day of April, 19 60.

Alice J. Luck
 Register.

THE STATE OF ALABAMA, }
Baldwin County } No. 4667 Circuit Court, In Equity.

WANDA MAE GRAHAM Complainant...

Vs.

BENJAMIN F. GRAHAM Defendant....

Motion is hereby made for a Decree Pro Confesso against

BENJAMIN F. GRAHAM Defendant.....

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant... ha failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 19 day of April 19.60

FILED
APR 29 1960

W. L. Hays
Solicitor.

ALICE J. DUCK, Register