

CECIL EVERETT BRUNER

No.

MARY ANN BRUNER

Complainant

Vs.

Defendant

IN THE CIRCUIT COURT OF

~~MOBILE~~ COUNTY, ALABAMA

BALDWIN

IN EQUITY

ANSWER AND WAIVER

Comes the defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegations of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

Peggy Preston

I further agree that \_\_\_\_\_, may take the testimony in this cause without the issuance of a commission.

ATTEST:

1. - \_\_\_\_\_ Mary Bruner  
Defendant

2. Complainant agrees that \_\_\_\_\_ Peggy Preston \_\_\_\_\_, may take the testimony in

this cause as commissioner, without issuance of a commission.

Cecil E. Bruner  
Complainant

NOTE: The space below is intended for "Agreements Between the Parties".

Respondent agrees to the complainant having all of the household furniter, the automobile and she does hereby release him from all claims of alimony and support. Complainant agrees to pay the respondents doctors bills which are now due and he agrees to redeem the camera from the pawnshop and give it to her.

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Cecil E. Bruner  
Complainant

Mary Bruner  
Respondent.

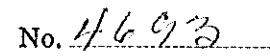
STATE OF Alabama  
COUNTY OF Mobile

I, \_\_\_\_\_ a NOTARY PUBLIC in and for said State and County, do hereby certify that Mary Ann Bruner, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, she executed the same voluntarily on the day same bears date.

Witness my hand and seal this 27th day of August, 1959

Peggy S. Preston  
NOTARY PUBLIC

Filed \_\_\_\_\_ STATE OF Alabama  
COUNTY OF Mobile  
Registrar \_\_\_\_\_



SECRET

AND BOOKS, CLERK

CECIL EVERETT BRUNER,  
Complainant,

-vs-

MARY ANN BRUNER,  
Respondent.

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

NO. \_\_\_\_\_

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,  
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and unto  
this Honorable Court as follows:

ONE

Complainant is the husband of the Respondent and they were  
married to each other on July 22, 1959 in Lucedale, Mississippi.  
Both the Complainant and the Respondent are each over the  
age of twenty-one years and both the Complainant and the  
Respondent are bona-fide resident citizens of the State of  
Alabama and have been such for more than one year next preceding  
the filing of the bill of complaint herein. There are no  
minor children as issue of their marriage.

TWO

The Respondent has committed adultery with one or more males  
since her marriage to the Complainant.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of  
this cause, will make the said Mary Ann Bruner, party-respondent  
hereto, and will cause her to plead, answer or demur hereto,  
within the time allowed by law and the rules of this Honorable  
Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant him an absolute divorce from the bonds of matrimony with the Respondent, and Complainant further prays for such, other, farther or different relief as in equity he may be due, and as in duty bound she will ever pray, etc.

William D. Harper  
SOLICITOR FOR COMPLAINANT

THESE

AUG 29 1959

ALICE I. DUCK, CLERK  
REGISTER