

QUEEN ETHERIDGE

Complainant,

-vs-

ROBERT E. ETHERIDGE

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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. He admits the allegations contained in Paragraph 1 of the Bill of Complaint

2. He admits the allegations contained in Paragraph 2 of said Bill of Complaint.

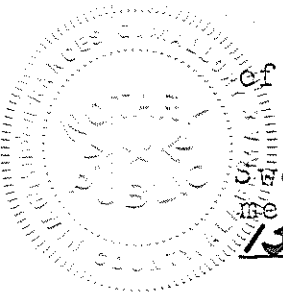
3. He denies each and every allegation contained in Paragraph 3 of said Bill of Complaint and demands strict proof thereof.

4. He admits the allegations contained in Paragraph 4 of said Bill of Complaint.

5. He admits the allegations contained in Paragraph 5 of said Bill of Complaint.

Sworn to and subscribed before me, a Notary Public, on this the 15th day of May, 1956.

*R. E. Etheridge*  
*Frances J. Mallory*  
Notary Public, Baldwin Co., Ala.



THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama

(In Equity)

QUEEN ETHERIDGE

Complainant

VS.

ROBERT E. ETHERIDGE

Respondent

I, Dorothy Chason

as Register and Commissioner

have called and caused to come before me Queen Etheridge and Lillian R. Cardwell

witnesses named in the Requirement for Oral Examination, on the 15 day of May 1956, at the office of C. G. Chason in Foley, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Queen Etheridge and Lillian Cardwell doth depose and say as follows:

Testimony of Queen Etheridge:

My name is Queen Etheridge. I am over the age of twenty-one years, and have been a bona fide resident citizen of Foley, Baldwin County, Alabama for over three and one-half years. Robert E. Etheridge is over the age of twenty-one years and has been a bona fide resident citizen of Foley, Baldwin County, Alabama for over three and one-half years. We were married on November 1, 1943 and lived together as man and wife until January 1956, since which time, although we have occupied the same residence, we have not lived together as husband and wife. This separation is a result of verbal abuse and threats made to and against me by my husband, Robert E. Etheridge. Although he has not until this day actually done me any physical bodily harm, I now live in constant fear and apprehension, and am reasonably convinced that should we continue to live together as husband and wife, or to reside in the same residence, that he would do me physical bodily harm, and commit actual violence on my person, attended with danger to my life or health. These threats and the abuse that I have taken have resulted in extremeloss of weight, sickness, and extreme nervousness. At the present time I am on the verge of a nervous break down, and I am under the treatment of a physician, and I am in constant fear.

We have three children of this marriage, namely, Sandra Etheridge, who is 11 years of age, Sheldon Etheridge, who is 9 years of age, and Beverly Etheridge, who is 4 years of age. These children are in my care, custody and control, and I believe my husband to be financially able to pay our house rent, which is now \$52.50, and should not at any time exceed \$60.00 per month, and the utilities, including lights, water, telephone, and gas, and in addition the sum of \$150.00 per month as alimony and support, and as support and maintenance for these children.

Queen Etheridge

Testimony of Lillian Cardwell:

My name is Lillian Cardwell. I am personally acquainted with Queen Etheridge and with Robert E. Etheridge, both of whom are over the age of twenty-one years, and both of whom are bona fide resident citizens of Baldwin County, Alabama, having lived here for more than three years. I have heard Robert E. Etheridge threaten to strike Queen Etheridge, and have heard much abusive language and threats. I believe that were I in her position, I would be afraid for my safety. I believe that it is reasonable for her to be apprehensive of actual violence and physical bodily harm attended with danger to her life or health. They have three children, Sheldon, Beverly, and Sandra, who are in the custody and control of their mother.

Lillian R. Cardwell

ORAL EXAMINATION.

I, Dorothy Chason, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down by me in writing in the words of the witnesses and read over to them and they signed the same in the presence of myself and each other at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proom made before me of the identity of said witnesses; that I am not of counsel or 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 16 day of May, 1956.

Dorothy Chason (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

QUEEN EPPERIDGE

vs. Complainant

ROBERT E. EPPERIDGE

Respondent.

Oral Deposition

Filed \_\_\_\_\_, 195\_\_\_\_\_

FILED

MAY 16 1956 Registered in

ALICE J. BERRY, Register  
Record

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

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Dorothy Chason

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 Queen Etheridge and Lillian Cardwell

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

Queen Etheridge, Complainant  
and

Robert E. Etheridge Respondent

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

Witness 16<sup>th</sup> day of May, 1956

[Signature]  
Register.

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

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

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

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

**CIRCUIT COURT**

Queen Etheridge

Complainant—

**vs.**

Robert E. Etheridge

Defendant—

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER

Dorothy Chason

WITNESSES:

Queen Etheridge

Lillian Cardwell

\_\_\_\_\_  
 \_\_\_\_\_  
 Queen Etheridge  
 vs.  
 \_\_\_\_\_  
 Robert E. Etheridge  
 \_\_\_\_\_  
 \_\_\_\_\_

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 testimony of Queen Etheridge and Lillian Cardwell

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

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 \_\_\_\_\_  
 \_\_\_\_\_

*Chasou*  
 Solicitor for Complainant

*W. J. ...*  
 Register.



QUEEN ETHERIDGE  
Complainant  
VS  
ROBERT E. ETHERIDGE  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

This cause coming on to be heard was submitted upon Bill of Complaint, 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 Respondent be, and the same are hereby dissolved, and that the said Complainant is hereby granted a divorce from the bed and board of the Respondant for and on account of cruelty.

It is further adjudged and decreed that the Complainant, Queen Etheridge have the custody and control of the minor children of their marriage, namely, Sheldon Etheridge, Beverly Etheridge, and Sandra Etheridge, with reasonable rights of visitation being granted to the Respondent.

It is further ordered, adjudged and decreed that the Respondent, Robert E. Etheridge, pay to the Complainant, Queen Etheridge, the sum of \$150.00 per month as alimony and for the maintenance and support of the minor children hereinabove named, and that in addition thereto, he must pay house rent for the Complainant in a sum not to exceed \$60.00 per month, and that he pay all utilities such as lights, water, telephone, and gas, in an amount equal to that normally consumed by a family of like size.

It is further ordered, adjudged and decreed that the Respondent, Robert E. Etheridge, pay the cost of this proceeding herein to be taxed, for which executed may issue.

Done this the 16 day of May, 1956.

*Hubert M. Hall*  
Judge Circuit Court, In Equity.



QUEEN ETHERIDGE  
Complainant  
VS.  
ROBERT E. ETHERIDGE  
Respondent

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Comes your Complainant, Queen Etheridge, and files this her Bill of Complaint for Divorce from bed and board against Robert E. Etheridge, and respectfully represents and shows unto your Honor:

1. That the Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such a bona fide citizen for more than three and one-half years; that Robert E. Etheridge is over the age of twenty-one years and is a bona fide citizen of Baldwin County Alabama, having been such a bona fide citizen for more than three and one-half years.

2. That the Complainant and Respondent were lawfully married on, to-wit, November 1, 1943, and lived together as man and wife until January 1956.

3. The Complainant further avers that even though Respondent has not committed actual violence on her person, attended with danger to her life and health, from his conduct toward her, and from threats made of doing her physical, bodily harm attended with danger to her life or health, she is reasonably apprehensive of such violence, and is in fear for her health and safety if she continues to reside with him.


4. Complainant further shows to the Court that there was born of this marriage three (3) children, namely: Sheldon Etheridge, who is nine years of age, Beverly Etheridge, who is four years of age, and Sandra Etheridge, who is eleven years of age, all of whom are in the care, custody, and control of the Complainant.

5. Complainant further avers that the Respondent is fin-

financially able to pay to her for her support and maintenance, and for the support and maintenance of their minor children, her house rent, which should not be in excess of \$60.00, the utilities, including lights, water, telephone, and gas that is usual for a family of like size, and in addition thereto, the sum of \$150.00 per month.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, Your Complainant prays that Robert E. Etheridge be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to 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 Complainant be granted a divorce from the bed and board of the Respondent, and that she be granted separate maintenance for herself and children hereinabove named; and that she be granted care, custody, and control of the children of this marriage, with reasonable rights of visitation to the Respondent. Should your Complainant be mistaken in the relief prayed for, that she be granted such other, further, different and general relief to which she may be entitled and as in duty bound she will ever pray.

  
Solicitor for Complainant

  
Complainant

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