

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Louise S. Grantham, Complainant

vs.

W. B. Grantham, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Declaratory Decree~~ ~~Confession~~ on Waiver and Answer 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

Louise S. Grantham is forever divorced from the said W. B. Grantham for and on account of

Cruelty; that the agreement entered into between the parties to this cause dated August 20, 1956, be and the same is hereby adopted and incorporated in this decree the same as if fully set out herein. It is further ordered that the care, custody and control of the minor children of the marriage, namely Robert B. Grantham, Elsie Grantham, and Margie Grantham is awarded the Complainant; it is further ordered that the Complainant may resume the use of her maiden name.

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 W. B. Grantham the Respondent pay the cost herein to be taxed, for which executed may issue.

This 21st day of August 1956

[Signature of Judge]

Judge Circuit Court, In Equity.

I, Alice J. Duck, 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 August, 1956

Register of Circuit Court, In Equity.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Louise S. Grantham

Complainant

vs.

W. B. Grantham

Respondent

DIVORCE DECREE

*Filed: 8-21-56
Alice J. Duck, Reg.
WS*

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Louise S. Grantham

Complainant

VS.

W. B. Grantham

Respondent

I, Maurine Montgomery Brice
as Register and Commissioner _____
have called and caused to come before me Louise S. Grantham

witness _____ named in the Requirement for Oral Examination, on the 20 day of August
1956, at the office of James A. Brice
in Foley, Alabama, and having first sworn said Witness _____ to speak the
truth, the whole truth, and nothing but the truth, the said Louise S. Grantham
_____ doth depose and say as follows:

"My name is Louise S. Grantham. I am the Complainant in the divorce cause entitled Louise S. Grantham Vs. W. B. Grantham. I am over twenty-one years of age as is my husband W. B. Grantham. We are both residents of Baldwin County, Alabama. We were married in Bay Minette, Alabama, on February 20, 1931.

For the past several years my husband has been given more and more to a strong temper and quick outbursts of anger at me. He would threaten me with bodily harm when I had done nothing to provoke him. On the 17th of August, 1956, he flew out at me in a rage, and began hitting and kicking me, and I ran from him in fear for my life, and I have not lived with him since.

Further deponent sayeth not.

Louise S. Grantham
Louise S. Grantham

ORAL EXAMINATION.

I, Maurine Montgomery Brice, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness _____ and read over to him and _____ signed the same in the presence of myself _____ and James A. Brice, Attorney at Law _____ at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proom made before me of the identity of said witness _____; 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 20 day of August, 1956.

Maurine Montgomery Brice (L. S.)

NO. 3857 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Louise S. Grantham

vs. W. B. Grantham

Complainant

Respondent.

Oral Deposition

Filed August 19, 1956
Oliver J. Duffer Register.

Recorded in _____ Record _____

Vol. _____ Page _____, Register _____

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Louise S. Grantham

Complainant

VS.

W. B. Grantham

Respondent

I, Maurine Montgomery Brice

as Register and Commissioner

have called and caused to come before me Robbie Burruss Grantham

witness named in the Requirement for Oral Examination, on the 20 day of August 1956, at the office of James A. Brice, Attorney at Law in Foley, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said Robbie Burruss Grantham doth depose and say as follows:

"My name is Robbie Burruss Grantham. I have known Louise S. Grantham and W. B. Grantham all my life.

I was present on August 17, 1956, when W. B. Grantham began arguing and shouting at Louise S. Grantham. He said he was going to beat hell out of her and he started in on her with his fists, and kicking her. She hadn't done anything to get him mad. He ran her out of the house, and she was funning in fear from him."

Further deponent sayeth not.

Robbie Burruss Grantham
Robbie Burruss Grantham

ORAL EXAMINATION.

I, Maurine Montgomery Brice, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness _____ and read over to him and he signed the same in the presence of myself and James A. Brice, Attorney at Law at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proom made before me of the identity of said witness _____; 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 20 day of August, 195 6.

Maurine Montgomery Brice (L. S.)

NO. 3857 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Louise S. Grantham

vs. Complainant

W. B. Grantham

Respondent.

Oral Deposition

Filed Aug. 19, 195 6

Oliver G. Duckert Register.

Recorded in

Record

Vol. _____ Page _____

Register

Louise S. Grantham
Complainant

vs.
W. B. Grantham
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 Testimony by deposition _____

and in behalf of Defendant upon _____ Waiver and Answer _____

James M. Brin
Solicitor for Complainant

Alice J. Duck
Register.

EXHIBIT "A"

AGREEMENT OF PARTIES CONTEMPLATING
A DIVORCE WITH REFERENCE TO CUSTODY OF CHILDREN
AND PROPERTY RIGHTS

This agreement, made and entered into this 20th day of August, 1956, by and between W.B. Grantham, hereinafter called husband, and Louise S. Grantham, hereinafter called wife, WITNESSETH:

THAT whereas, various and divers disputes and unhappy differences have arisen between husband and wife, and they are separated and not now living together as husband and wife, and whereas it is the desire of the parties hereto to make a complete and final settlement of all their property, and to settle and adjust all marital interests, now therefore, this agreement is made as follows:

1. The wife shall have the care, custody and control of the minor children, Robert B. Grantham, Elsie Grantham, and Margie Grantham. The husband shall have the right of visitation at all reasonable times.
2. The husband shall pay to the wife the following sums for the support and maintenance of the minor children, to wit:

Cash upon execution of this agreement:	\$1,000.00
January 1, 1957	1,000.00
April 1, 1957	3,000.00

The husband agrees further to and does hereby release and transfer to the wife as her sole property that certain 1952 Oldsmobile automobile owned heretofore by the husband. The husband further transfers to the wife all of the household furniture and furnishings now owned by the parties.

3. The wife concurrently herewith agrees to and does hereby release, remise and quitclaim to the husband any and all right, title and interest she has or may have in that certain parcel of real property in Baldwin County, Alabama, described as the Southeast Quarter of Section 10, Township 8 South, Range 3 East, and all farm equipment thereon.
4. It is further agreed that any and all property acquired by either party subsequent to the date of this agreement shall be the separate property of the party acquiring same; and each party agrees to execute for the other any and all papers necessary to complete the transfer of property herewith divided and apportioned. It is further agreed that the terms of this agreement may be incorporated in any decree of divorce which may be hereafter obtained by either party, and enforced by contempt proceedings if necessary.
5. It is agreed and understood by the parties that in consideration of this settlement, no further alimony shall be due or shall grow due between these parties.

IN WITNESS WHEREOF, we have hereunto set our hands and seals this 20th day of August, 1956.

W.B. Grantham (L.S.)
W.B. GRANTHAM

Louise S. Grantham (L.S.)
LOUISE S. GRANTHAM

The State of Alabama)
Baldwin County) I, *James A. Bruce*, a Notary Public in and for
said County and State, hereby certify that W.B. Grantham and Louise S.
Grantham, 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. Witness my hand and seal this 20th day of August, 1956.

James A. Bruce
NOTARY PUBLIC

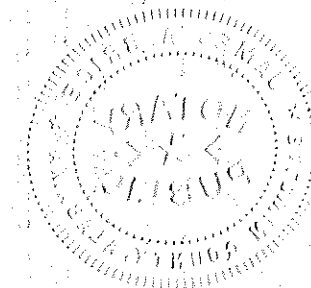
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FILED

AUG 21 1956

ALICE J. DUCK, Register



BILL OF COMPLAINT

LOUISE S. GRANTHAM
COMPLAINANT
V.
W. B. GRANTHAM
RESPONDENT

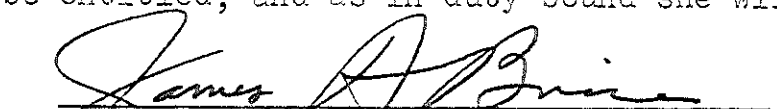
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

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

Comes your Complainant, Louise S. Grantham, and respectfully
shows unto this Honorable Court as follows:

1. That she is over the age of twenty-one years and a bona fide resident citizen of Baldwin County, Alabama; that W. B. Grantham, the respondent in this cause, is over the age of twenty-one years and a resident citizen of the State of Alabama.
2. That on, to-wit: the 20th day of February, 1931, your complainant and the respondent were intermarried in Baldwin County, Alabama; and are still husband and wife; that there were five children born of this marriage, namely Glenn Grantham, twenty-three years old; Vern Grantham, twenty-one years old; Robert B. Grantham, nineteen years old; Elsie Grantham, ten years old; and Margie Grantham, eight years old.
3. Your Complainant avers and charges that the Respondent did on the 17th day of August, 1956, commit acts of physical violence on the Complainant by striking, hitting and kicking the Complainant, attended with danger to her health or life; that she is reasonably convinced that he will commit further actual violence upon her person, attended with danger to her health or life, that on the 17th day of August, 1956, she separated from and abandoned the said Respondent, and is now living separate and apart from him.
4. That Complainant and Respondent have entered into an agreement with reference to a property settlement, and custody of minor children, which is attached as EXHIBIT A and made a part hereof.

THE PREMISES CONSIDERED, complainant prays that W. B. Grantham be made a party respondent to this Bill of Complaint by the usual process of this Honorable Court, and the statutes in such case made and provided, requiring him to plead, answer or demur within the time and in the manner provided by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your Complainant from said Respondent, granting the Complainant the right to remarry, and granting and awarding to the Complainant the care, custody and control of the minor children of the marriage, and granting the Complainant the right to resume her maiden name; and Complainant avers that the agreement set forth in paragraph 4 of this Bill of Complaint, a copy of which is attached hereto as Exhibit A, is a reasonable, just and proper agreement and prays the Honorable Court that in the event a decree of divorce is given in this cause the Honorable Court will decree that the parties keep and abide by the terms of said agreement; and Complainant further prays that your Honor will grant such other further, different and general relief to which the Complainant may be entitled, and as in duty bound she will ever pray.


Solicitor for Complainant

FILED

AUG 21 1956

ALICE J. DUCK, Register

WAIVER AND ANSWER

LOUISE S. GRANTHAM
Complainant

V.

W.B. GRANTHAM
Respondent

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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 inn said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, the Respondent says:

1. He admits the allegations contained in paragraph 1 of the said bill of complaint.

2. He admits the allegations contained in paragraph 2 of the said bill of complaint.

3. He denies each and every allegation contained in paragraph 3 of the said bill of complaint and demands strict proff thereof.

4. He admits the allegations contained in paragraph 4 of the said bill of complaint.

FILED

AUG 21 1956

ALICE J. DUCK, Register

W. B. Grantam
Respondent

Attest: James A. Brice