

3866

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ETHEL MAE WHITE PUGH

Complainant

vs.

CHARLES B. PUGH

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Consa~~ 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 ETHEL MAE WHITE PUGH is forever divorced from the said CHARLES B. PUGH for and on account of Cruelty.

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 ETHEL MAE WHITE PUGH the Complainant pay the cost herein to be taxed, for which executed may issue.

This 4th day of September, 19 56

Hubert M. Hice 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.

No. 3866 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

ETHEL MAE WHITE PUGH

Complainant

vs.

CHARLES B. PUGH

Respondent

DIVORCE DECREE

FILED
SEP 4 1956
ALICE L. DUCK, Register

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: MYRNA LOU TAYLOR
Fairhope, Alabama

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 Ethel Mae White Pugh

a witnesses in behalf of Ethel Mae White Pugh in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Ethel Mae White Pugh

_____ , Complainant
and Charles B. Pugh

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

Witness 21st day of August, 1956

Alice J. Deup
48 Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 3866

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

ETHEL MAE WHITE PUGH

Complainant

VS.

CHARLES B. PUGH

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

FILED

SEP 4 1956

WITNESSES: Notary Register

[Faint, mostly illegible text from the reverse side of the document, including what appears to be a signature and a date.]

The State of Alabama, { Circuit Court of Baldwin County, Alabama
Baldwin County. } (In Equity)

ETHEL MAE WHITE PUGH Complainant

VS.

CHARLES B. PUGH Respondent

I, Myrna Lou Taylor

as ~~Register~~ Commissioner

have called and caused to come before me Ethel Mae White Pugh

witness named in the Requirement for Oral Examination, on the 22nd day of August
1956, at the office of Ernest M. Bailey, Attorney at Law,
in Fairhope, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Ethel Mae White Pugh
doth depose and say as follows:

STATEMENT OF ETHEL MAE WHITE PUGH:

My name is Ethel Mae White Pugh and the Respondent's name is Charles B. Pugh. We are both over the age of 21 years and I am a bona fide resident of Baldwin County, Alabama. The Respondent is now living in Mobile, Alabama.

The Respondent and I were married in December, 1954 in Georgiana, Alabama and lived together as husband and wife until June 30, 1956. On June 30, 1956 I was forced to live separate and apart from the Respondent because he abused and threatened me. He has threatened me frequently when drinking. He has a violent temper and has threatened to do violence to me. I am of the opinion that if we continue to live together, the Respondent will commit actual violence and may injure me permanently.

The Respondent and I have no children of this marriage.

Ethel Mae White Pugh
Ethel Mae White Pugh

ORAL EXAMINATION

I, Myrna Lou Taylor, 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 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 proom 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 22nd day of August, 1956

Myrna Lou Taylor (L. S.)

No. 3866

Page

The State of Alabama
Baldwin County.

In Circuit Court, In Equity

EMHEL MAE WHITE PUGH

vs. Complainant

CHARLES B. PUGH

Respondent

Oral Deposition

Filed 9-4, 1956

Recorded in Oliver J. Bruck Register

Record.

Vol. Page Register

Register

ETHEL MAE WHITE PUGH

vs.

CHARLES B. PUGH

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 Deposition of Complainant

and in behalf of Defendant upon Answer and Waiver

By
Samuel M. Taylor
Attorney for Complainant

Alice J. Deep
No Register.

No. 3866

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

ETHEL MAE WHITE PUGH

vs.

CHARLES B. PUGH

NOTE OF TESTIMONY

Filed in Open Court this 4th

day of Sept., 1956

Alice J. Deeb
Register.

Ethel Mae White Pugh,

Complainant

No.

Vs.

Charles B. Pugh,

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.

Walter Lee
Walter Lee

Charles B Pugh
Charles B Pugh
Defendant

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

The parties hereto agree as follows:-

That complainant waives all claims for alimony pendente lite and permanent and further agrees to pay all solicitor's fees and court costs incurred herein in her behalf.

IN WITNESS WHEREOF, the parties hereto have hereunto set their hands this the 29th day of August, 1956.

Ethel Mae White Pugh
Complainant

James M Bailey
Witness

Charles B Pugh
Respondent

Ann G Harrison
Witness

STATE OF Alabama

COUNTY OF Mobile

I, WALTER LEE, a NOTARY PUBLIC in and for said State and County, do hereby certify that Charles B. Pugh, whose name is signed to the foregoing instrument, and who is known to me, acknowledge before me this day, that being informed of the contents of the instrument, he executed the same voluntarily on the day same bears date.

Witness my hand and seal this 29th day of August, 1956

Filed, _____
W. ELSWORTH HAUGHTON, REGISTER

Walter Lee
Walter Lee
NOTARY PUBLIC
STATE OF Alabama
COUNTY OF Mobile

No. 3866

Vs.

FILED

SEP. 4 1956

ALICE J. DUCK, Register

ANSWER AND WAIVER

Filed _____, 19____

Register

STATE OF ALABAMA
BALDWIN COUNTY

Y
Y

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Charles B. Pugh to appear and plead, answer or demur, within thirty days from the service hereof, to a Bill of Complaint filed in the Circuit Court of Baldwin, County, Alabama, In Equity, by Ethel Mae White Pugh, as Complainant, against Charles B. Pugh, as Respondent.

Witness my hand this the 4th day of August, 1956.

Alice J. Dicks
REGISTER

ETHEL MAE WHITE PUGH,
Complainant
vs.

Y
Y
Y

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

CHARLES B. PUGH,
Respondent

Comes your Complainant, ETHEL MAE WHITE PUGH, and files this her Bill of Complaint for divorce against CHARLES B. PUGH, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years, and that your Complainant is a resident citizen of Baldwin County, Alabama, and the Respondent's last known residency to the best of her knowledge and belief was 653 South Carolina Street, Mobile, Alabama, and the Respondent's residency is otherwise unknown to her and cannot be ascertained by reasonable effort.

SECOND:

That the Complainant and the Respondent were married on, to-wit, December, 1954 in Georgiana, Alabama and lived together as man and wife until on, to-wit, June 30, 1956, when, on account of matters

hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that on June 30, 1956, and at times prior to that date the Complainant states that the Respondent from his manner and conduct towards her gave reasonable apprehension of his committing violence on her person, and from his manner and conduct towards her she is reasonably certain that he will commit such violence upon her person, attended with danger to her life and health.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named CHARLES B. PUGH be made a party Defendant to this cause by the usual writ or process, 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 Your Honor will, upon a final hearing of this cause, grant unto the Complainant an absolute divorce from said Respondent and will decree that the parties be allowed to remarry if they see fit and that the Respondent is not to harass your Complainant in any way or means. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other and different relief to which she may be entitled and as in duty bound she will ever pray.


SOLICITOR FOR COMPLAINANT

SUMMONS AND
BILL OF COMPLAINT

Ethel Mae White Pugh
Complainant
vs.
Charles B. Pugh
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

FILED
SEP. 4 1956
ALICE J. DUCK, Register

3866