

3898

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon DOYLE C. WRIGHT, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction, within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a bill of complaint lately exhibited by Katherine Wright against the said Doyle C. Wright and further to do and perform what said Judge shall order and direct in that behalf, and whic the defendant shall in no wise omit, under penalty of the law; and we further command that you return this writ with your endorsement thereon, to our said court immediately upon the execution thereof.

Witness, Alice J. Dusk, Register of said Circuit Court, this 17 day of October, 1956.

Register

KATHERINE WRIGHT, | IN THE CIRCUIT COURT OF
 | COMPLAINANT
 | VS
 | BALDWIN COUNTY, ALABAMA,
DOYLE C. WRIGHT, |
 | DEFENDANT | IN EQUITY

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

And now comes your complainant, Katherine Wright, and humbly complaining against Doyle C. Wright respectfully shows unto your honor as follows:

FIRST: That your complainant and the said Doyle C. Wright are each over the age of twenty-one years; that your complainant is a resident of Baldwin County, Alabama, where she has resided for more than twelve months next preceding this date; that Doyle C. Wright is a resident of Columbus, Georgia.

SECOND: That your complainant and the said Doyle C. Wright are husband and wife having intermarried at Phenix City, Alabama on September 24, 1950, and they lived together as husband and wife until July 5, 1955, when the said Doyle C. Wright voluntarily abandoned your complainant without just cause or reasonable excuse, and they have not lived together since said date. There were no children born to this marriage.

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 Doyle C. Wright, party defendant 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.

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 the said defendant and complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive in the premises.

Betty S. Sugarman
By: M. C. Sugarman

Solicitor for complainant.

KATHERINE WRIGHT | IN THE CIRCUIT COURT OF
COMPLAINANT |
VS | BALDWIN COUNTY, ALABAMA,
DOYLE C. WRIGHT |
DEFENDANT | IN EQUITY

And now comes the defendant in his own proper person and accepts service of the summons and complaint in the above styled cause, and denies each and every allegation contained in the bill of complaint, and demands strict proof of the same.

The defendant waives notice of the time of taking testimony on behalf of complaint, the right to cross examine complainant's witnesses, and agrees that this cause be submitted forthwith for final decree without further notice.

Doyle C. Wright
Defendant

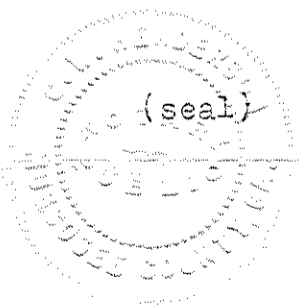
STATE OF GEORGIA

COUNTY OF Muscogee

I, Wm. H. Anderson, a Notary Public in and for said State and County, hereby certify that Doyle C. Wright, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal this the 17 day of Oct., 1956.

Wm. H. Anderson
Notary Public



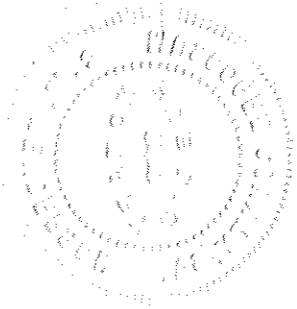
no. 3898

Katherine Wright
Complainant

v

Dayle C. Wright
Defendant

Answer & waiver



Filed Oct 17, 1956

FILED

OCT 17 1956

ALICE J. DUCK, Register

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Katherine Wright, Complainant vs. Doyle C. Wright, Respondent

answer & waiver

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Deed of Trust~~ of the defendant 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 Katherine Wright is forever divorced from the said Doyle C. Wright for and on account of

ABANDONMENT

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 Katherine Wright the complainant pay the cost herein to be taxed, for which executed may issue.

This 17th day of October, 1956

Hubert 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_____

Register of Circuit Court, In Equity.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED
OCT 17 1956
WILLIE W. DUCK, Register

Katherine Wright

vs.

Doyle C. Wright

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 waiver~~ answer/ of defendant and testimony as noted by the Register

and in behalf of Defendant upon answer and waiver

Robert L. Swearingen
by W. C. Beche
Solicitor for Complainant

Devin J. Smith
Register.

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Katherine Wright

vs.

Douglas C. Wright

NOTE OF TESTIMONY

Filed in Open Court this *17*

day of *October* , 19*46*

Alis French
Register.

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Katherine Wright

Complainant

VS.

Doyle C. Wright

Respondent

I, Madeline S. Bryars

as ~~Register~~ and Commissioner

have called and caused to come before me Katherine Wright and Evelyn Bryan

witnesses named in the Requirement for Oral Examination, on the 17 day of October 1956, at the office of Beebe & Swearingen in Bay Minette, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said Katherine Wright and Evelyn Bryan doth depose and say as follows:

My name is Katherine Wright. I am over the age of twenty-one years. I am a resident of Baldwin County, Alabama where I have resided for more than twelve months continuously next preceding this date. The defendant, Doyle C. Wright, is also over the age of twenty-one years. He is now a resident of Columbus, Georgia. That I and the said Doyle C. Wright married at Phenix City, Alabama on September 24, 1950 and lived together as husband and wife until July 5, 1955 when he voluntarily abandoned me without just cause or reasonable excuse. We have not lived together since. We have no children.

Katherine Wright

My name is Evelyn Bryan. I am twenty years of age. I am a niece of Katherine Wright, complainant in the suit pending in the Circuit Court of Baldwin County, Alabama, against Doyle C. Wright, for divorce. I have known her all of my life. She and Doyle were married at Phenix City, Alabama on September 24, 1950. He abandoned her July 5, 1955 and they have not lived together since. She lives in Baldwin County and has lived in Baldwin County for more than twelve months continuously next preceding this date.

Evelyn Bryan

ORAL EXAMINATION.

I, Madeline S. Bryars, 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 witnesses and read over to them and they signed the same in the presence of myself W. C. Beebe

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es, 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 17 day of October, 1956

Madeline S. Bryars (L. S.)

NO. 3898 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Robert W. Wright

vs. Complainant

Angie O. Wright

Respondent.

Oral Deposition

Filed October 17, 1956

W. C. Beebe, Register.
Recorded in _____

Record _____

Vol. _____ Page _____

Register _____

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Madeline S. Brvars

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 Katherine Wright and Evelyn Bryan

as witnesses in behalf of complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Katherine Wright is

and Doyle C. Wright is

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 17 day of October, 1956

Reice J. Duck

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3898

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Batherine Wright

Complainant—

vs.

Rayle P. Wright

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

Katherine Wright Complainant
vs.
Doyle C. Wright Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

No.

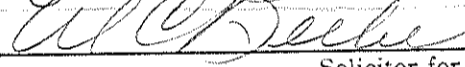
DEMAND FOR ORAL EXAMINATION

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from Bay Minette, in the County of Baldwin Alabama, the place of trial of said cause, to-wit: Katherine Wright and Evelyn Bryan

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

Beebe & Swearingen



Solicitor for Complainant

NOTE:

Complainant suggests the name of Madeline S. Bryars as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Beebe & Swearingen



Solicitor for Complainant.

3898

DEMAND FOR ORAL EXAMINATION

Katherine T. Wright
Complainant

vs.

Dayle C. Wright
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Filed this 17 day of Oct.

1966

Wright Register
Moore Printing Co.