

3968

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

FRANK MOODY, Complainant vs.

BETTY MOODY, Respondent

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 Defendant be, and the same are hereby dissolved, and that the said FRANK MOODY is forever divorced from the said BETTY MOODY 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 Frank Moody the Complainant pay the cost herein to be taxed, for which executed may issue.

This 12 day of February, 1957

Hubert W. Stalle 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. 3968 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

**FILED**  
FEB 12 1957  
ALICE L. DUCK, Register

FRANK MOODY,

Complainant,

-vs-

BETTY MOODY,

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. She admits the allegations contained in Paragraph 1 of the Bill of Complaint. ((She admits the allegations, except PAR. THREE AND FOUR, and states that she was a resident of Florida at the time of the separation.))

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

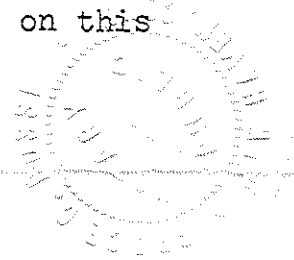
3. She denies each and every allegation contained in Paragraph 3 of said Bill of Complaint, and demands strict proof thereof.

4. She denies each and every allegation contained in Paragraph 4 of said Bill of Complaint, and demands strict proof thereof.

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

- 1 - Betty Moody

Sworn to and subscribed before me, a Notary Public, on this  
the 31st day of January, 1957.



Grace C. Bosse  
Notary Public, County of New Haven  
State of Connecticut

FRANK MOODY,	)	
	)	
Complainant,	)	IN THE CIRCUIT COURT OF
-vs-	)	BALDWIN COUNTY, ALABAMA
BETTY MOODY,	)	IN EQUITY
	)	
Respondent.	)	

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

Comes your Complainant, Frank Moody, and files this his Bill of Complaint for Divorce against Betty Moody, and respectfully shows unto your Honor:

1. That your Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such a resident citizen for more than two years next preceeding the filing of this Bill of Complaint; that Betty Moody is over the age of twenty-one years, and is presently a resident of New Haven, Conneticut, but was a resident of Baldwin County, Alabama, at the time of separation.

2. That the Complainant and the Respondent were lawfully married in February of 1956.

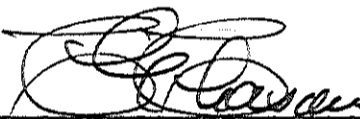
3. Your Complainant further avers and alleges that the Respondent has committed actual violence on his person by attacking him with a knife, which is attended with danger to his life and health, and from her conduct and threats made to him he is reasonably apprehensive of other and further acts of violence attended with danger to his life or health.

4. Complainant further avers and alleges that the attack on his person occured in August of 1956 and that as a result thereof he was unable further to live as husband and wife with the Respondent, and that she left Baldwin County, Alabama, and went to Hew Haven, Conneticut, where, according to information received by him, she is living, or has lived, in adultery with another person.

5. Complainant further shows unto the Court that there are no children of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Betty Moody be made a party defendant to this cause by the usual process of this Honorable Court, by service by Registered Mail, requiring her 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. The Complainant further prays that upon a final hearing of this cause that he be granted a divorce from the said Respondent. Should your Complainant be mistaken in the relief prayed for that he be granted such other, further, different and general relief to which he may be entitled and as in duty bound he will ever pray.

  
Solicitor for Complainant

3968

Frank Moody

vs

Betty Moody

Bill of Complaint

FILED  
FEB 12 1957  
ALICE J. DUCK, Register

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

FRANK MOODY

Complainant

VS.

BETTY MOODY

Respondent

I, Frances G. Mallory

as Register and Commissioner in Chancery

have called and caused to come before me Frank Moody and Eddie Alexander

witness ES named in the Requirement for Oral Examination, on the 12th day of February  
1957, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said Witness ES to speak the  
truth, the whole truth, and nothing but the truth, the said Frank Moody and Eddie  
Alexander doth depose and say as follows:

Testimony of Frank Moody:

My name is Frank Moody. I am over the age of twenty-one years and a bona fide resident citizen of Baldwin County, Alabama, having been such a resident citizen for more than two years. Betty Moody is over the age of twenty-one years, and is a resident of New Haven Conneticut, We were married in February of 1956. Betty Moody has attacked me with a knife, and threatened to kill me, and has threatened to do me other and further bodily harm, attended with danger to my life and health, and I am afraid to live with her anymore. This attack occured in August of 1956, and since that time we have not lived together as husband and wife, nor in any recognized each other as husband and wife. There are no children of this marriage.

Signed: Frank moody

Testimony of Eddie Alexander:

My name is Eddie Alexander. I am over the age of twenty-one years and a resident of Baldwin County, Alabama. I am personally acquainted with Frank Moody and Betty Moody, He is a resident of Baldwin County, Alabama, and has been for over two years. She lives in New Haven, Conneticut at the present time. They are both over the age of twenty-one years. They were married in February of 1956, and separated in August of 1956, at which time Betty Moody attached Frank Moody with a knife and threatened to do other and further bodily harm to Frank Moody. Since that time Frank Moody and Betty Moody have not lived together as man and wife, nor in any way recognized each other as husband and wife. There are no children of this marriage.

Signed: Eddie Alexander



**ORAL EXAMINATION.**

I, Frances G. Mallory, 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 es and read over to them and they signed the same in the presence of myself and C. G. Chason 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 12th day of February, 1957.

*Frances G. Mallory*

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THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

FRANK MOODY

vs. Complainant

BETTY MOODY

Respondent.

**Oral Deposition**

Filed FEB 12 1957 1957

Recorded in ALICE L. DIRECTOR Register

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

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: FRANCES G. MALLORY

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 Frank Moody and Eddie Alexander

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

Frank Moody

Complainant

and Betty Moody

Respondent

on oath, to be by you administered, upon them to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 12th day of February, 1957

*David J. ...*  
Register.

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

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

FRANK MOODY

vs.

BETTY MOODY

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 Frank Moody and Eddie Alexander

and in behalf of Defendant upon Answer and Waiver

*Ed Chapman*  
*Substituted for Complainant*

*George Duck*  
Register.

No. 3968.....

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

FRANK MOODY

vs.

BETTY MOODY

NOTE OF TESTIMONY

Filed in Open Court this .....

day of **FILED** ....., 194 .....

FEB 12 1957

**ALICE A. DUCK**, Register

Register.

Printed by the Baldwin Times

CECIL G. CHASON

ATTORNEY AT LAW  
FOLEY, ALABAMA

February 11, 1957

Mrs. Alice J. Duck, Register  
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint, Testimony of Frank Moody and Eddie Alexander, Deposition to take Testimony, Note of Testimony and Answer and Waiver in the Divorce action of Moody -vs- Moody.

There is also enclosed my check in the amount of \$13.50, in payment of the Costs of Court.

Yours very truly,



C. G. Chason

CGC:fm

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