

3969

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

FLORRIE A. GRAHAM, Complainant

vs.

WILLIAM TROY GRAHAM, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ 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 Florrie A. Graham, sometimes known as Florrie A. Graham is forever divorced from the said William Troy Graham for and on account of voluntarily 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 Florrie Graham the Complainant pay the cost herein to be taxed, for which executed may issue.

This 22 day of MARCH 19 57

Robert M. Hall 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 the day of MARCH 19 57

Register of Circuit Court, In Equity.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

FLORRIE A. GRAHAM

Complainant

vs.

WILLIAM TROY GRAHAM

Respondent

DIVORCE DECREE

FILED

MAR 19 1957

ALICE L. OWEN, Register

FLORRIE A. GRAHAM,
Complainant,
vs.
WILLIAM TROY GRAHAM,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.

ANSWER AND WAIVER

Now comes the Respondent in the above styled cause and for answer to the Bill of Complaint heretofore filed in this cause says:

1. He admits the allegations of Paragraphs 1, 2 and 3.
2. He denies the allegations of Paragraphs 4, 5 and 6 and demands strict proof thereof.

The said Respondent waives notice of the date set for hearing of this cause and consents and agrees that the said cause be set for hearing, testimony be taken and a decree rendered without further notice to him, all of which is hereby expressly waived.


William Troy Graham, Respondent.

STATE OF ALABAMA

BALDWIN COUNTY

I, James R. Owen, a Notary Public, within and for said County in said State, hereby certify that William Troy Graham 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 instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal on this the 21st day of March, 1957.


Notary Public, Baldwin County, Alabama

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

FLORRIE A. GRAHAM

Complainant

VS.

WILLIAM TROY GRAHAM,

Respondent

I, ALICE L. MILLER

~~XXXXXXXXXXXX~~
as Register and Commissioner

have called and caused to come before me Florrie A. Graham

witness named in the Requirement for Oral Examination, on the _____ day of MARCH
1945, at the office of JAMES R. OWEN, ATTORNEY AT LAW
in BAY MINETTE, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Florrie A. Graham
doth depose and say as follows:

My name is Florrie A. Graham and I am the Complainant in this cause and I am sometime known as Florrie A. Graham.

The respondent and I are both over the age of twenty-one years and are bona fide resident citizens of the State of Alabama and Baldwin County, and have been for more than one year next preceding the filing of the Bill of Complaint in this cause.

The Respondent and I were lawfully married on January 10, 1938, in Bay Minette, Alabama, and lived together as man and wife until February 10, 1956, and there were no children born of this marriage.

The respondent did, on February 10, 1956, voluntarily abandon me, since which time the respondent and I have not lived together as man and wife nor in any way recognized each other as husband and wife. The said abandonment was without any fault whatsoever on my part.

Florrie A. Graham
Complainant.

ORAL EXAMINATION.

I, ALICE L. MILLER, 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 JAMES R. OWEN

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 5th day of MARCH, 1948 57.

Alice L. Miller (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed _____, 194_____

Register.

Recorded in

Record

Vol. _____

Page _____

Register.

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: ALICE L. MILLER

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 FLORRIE A. GRAHAM

a witnesses in behalf of FLORRIE A. GRAHAM in a cause pending in our Circuit Court in Baldwin County, of said State, wherein FLORRIE A. GRAHAM

Complainant and WILLIAM TROY GRAHAM

Respondent

on oath, to be by you administered, upon FLORRIE A. GRAHAM 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 MARCH, 195 7

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

**THE STATE OF ALABAMA
Baldwin County**

CIRCUIT COURT

Complainant _____

VS. _____

Defendant _____

COMMISSION TO TAKE DEPOSITION

COMMISSIONER: _____

WITNESSES: _____

any depositions ever taken in this case and the same are hereby certified to be true and correct as the same appear from the records of the Court in this case.

Witness my hand and seal of office at the City of Montgomery, Alabama, this _____ day of _____, 19____.

Commissioner

Witness

Deponent

Subscribed and sworn to before me this _____ day of _____, 19____.

Notary Public for the State of Alabama

FLORRIE A. GRAHAM

Complainant,

vs.

WILLIAM TROY GRAHAM

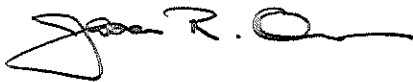
Respondent.

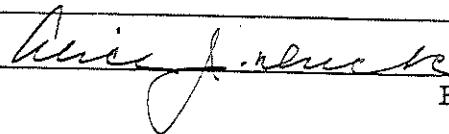
THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, AND
Testimony of the Complainant.

and in behalf of Defendant upon Answer and Waiver




Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

vs.

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

Register.

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon William Troy Graham to appear within thirty days from the service of this writ in the Circuit Court, Equity Side, to be held for said county at the place of holding the same, then and there to answer the complaint of Florrie A. Graham.

Witness my hand this 12 day of February, 1957.

W. J. ...
Register.

FLORRIE A. GRAHAM,	!	IN THE CIRCUIT COURT OF
Complainant,	!	BALDWIN COUNTY, ALABAMA
vs.	!	IN EQUITY.
WILLIAM TROY GRAHAM,	!	
Respondent.	!	

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

Your Complainant, Florrie A. Graham, respectfully represents unto the Court and unto your Honor as follows:

1. Your Complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and has been a bona fide resident citizen of the State of Alabama and Baldwin County, for more than one year next preceding the filing of this Bill of Complaint. The Respondent, William Troy Graham, is over the age of twenty-one years and is a resident of Baldwin County, Alabama.
2. Your Complainant and the Respondent were lawfully married on or about, to-wit, January 10, 1938 in Bay Minette, Alabama, and lived together as man and wife until February 10, 1956.
3. There were no children born to this marriage.
4. Your Complainant further avers and charges that the Respondent did, on February 10, 1956, voluntarily abandon the bed and board of your Complainant, since which time Complainant and

Respondent have not lived together nor in any way recognized each other as husband and wife.

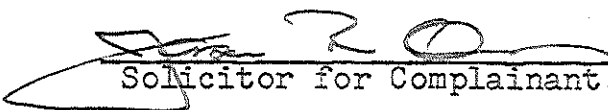
5. Your Complainant avers that it has become necessary for her to employ an attorney to represent her in this cause and that she is without funds to pay her said attorney for services rendered and to be rendered by him in this cause.

6. Your Complainant avers that she and the Respondent are joint owners or tenants in common of the following described property situated in Baldwin County, Alabama, to-wit:

The West half of Lot 88 in the Old Town of Bay Minette, according to the official map or plat thereof which is recorded in the Office of the Judge of Probate of Baldwin County, Alabama;

Your Complainant further alleges that she and the Respondent through their joint efforts purchased the said property and maintained a dwelling house situated on the said property.

The premises considered, your Complainant makes the said William Troy Graham a party Respondent to this Bill of Complaint and in order that your Complainant may have the relief prayed for herein, may it please the court to cause the State's writ of subpoena to be issued, directly to the said William Troy Graham, commanding him to plead, answer or demur to this Bill of Complaint within the time required by law; that upon a final hearing of this cause, your Honor will make and enter a decree divorcing your Complainant from the said Respondent, will fix a monthly sum to be paid to your Complainant by the Respondent for alimony and order that the Respondent pay said monthly sum; will decree that the Respondent's interest in the above described property be vested in your Complainant as permanent alimony; fix an amount to be paid to your Complainant's attorney for his services rendered in this cause and order that this sum be paid by the said Respondent and that your Honor will grant such other, further and different relief as may seem just and proper, the premises considered.


Solicitor for Complainant.