

(3705)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

AUDREY MAE ALDERMAN

Complainant

vs.

WILLIAM EARNEST ALDERMAN

Respondent

Waiver & Answer

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~

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

AUDREY MAE ALDERMAN

is forever divorced from the

said WILLIAM EARNEST ALDERMAN

for and on account of

"CRUELTY"

It is further ORDERED, ADJUDGED AND DECREED that permanent care, custody and control of the infant child, LINDA SUE ALDERMAN, be, and it is hereby vested in the complainant, AUDREY MAE ALDERMAN, with reasonable rights of visitation; in the respondent, WILLIAM EARNEST ALDERMAN, and that the respondent pay to the complainant the sum of \$5.00 per week for the support and maintenance of said child.

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 AUDREY MAE ALDERMAN the Complainant pay the cost herein to be taxed, for which executed may issue.

This 30 day of March 19 57

Y. Robert Moore

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 3-30-67
Alice H. New
[Signature]

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No. 3985

TERM, 19

BOOK
022
PAGE
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TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon WILLIAM EARNEST ALDERMAN

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

WILLIAM EARNEST ALDERMAN, Defendant.

by AUDREY MAE ALDERMAN

Plaintiff.

Witness my hand this 5th day of March 1957

Alice J. Newer, Clerk

No. _____ Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

AUDREY MAE ALDERMAN

Plaintiffs

vs.

WILLIAM EARNEST ALDERMAN

Defendants

Summons and Complaint

Filed _____ March 5, 1957 19 _____

Alice J. Duck

Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

_____ 19 _____

_____, Sheriff

I have executed this summons

this _____ 19 _____

by leaving a copy with

_____ Sheriff

_____ Deputy Sheriff

AUDREY MAE ALDERMAN,	0	
Complainant,	0	IN THE CIRCUIT COURT OF
VS.	0	BALDWIN COUNTY, ALABAMA.
WILLIAM EARNEST ALDERMAN,	0	IN EQUITY. NO. _____
Respondent.	0	

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

Your Complainant, AUDREY MAE ALDERMAN, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your complainant is over the age of seventeen years and is a bona fide resident citizen of Baldwin County, Alabama, and has been a bona fide resident citizen of said State for more than two years next preceding the filing of this bill of complaint; that the respondent is over the age of twenty-one years and is presently a resident of Escambia County, Florida.

2.

That your complainant and the respondent married in Jackson County, Mississippi, on, to-wit: the 4th day of November, 1955.

3.

That, on, to-wit: the 15th day of May, 1956, the respondent committed actual violence to your complainant by striking her and doing other violence to her person which necessarily endangered her life and health; that the conduct of the respondent was such as to give your complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with him as his wife he would do further violence to her person which would necessarily endanger her life or health. That as a result of said treatment as aforesaid, complainant left the respondent at that time and has not since that time returned to live with him as his wife.

4.

That there was born of this marriage one child, LINDA SUE ALDERMAN, who is now about two months of age. That your complainant is a fit and proper person to have the care, custody and control of said child; that the respondent is not a fit

and proper person to have the care, custody and control of said minor child.

5.

That your complainant is without funds with which to support and maintain said minor child; and that the respondent is a strong, able-bodied man, who is able to work and support said child.

WHEREFORE, THE PREMISES CONSIDERED, your complainant prays that your Honor will by proper process make the said ^{William} ~~Walter~~ Earnest Alderman ~~same~~ party respondent to this bill of complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your complainant further prays that on a final hearing of this cause your Honor will make and enter a decree granting to her and absolute decree of divorce, forever barring the bonds of matrimony existing between her and the respondent, giving her the permanent care, custody and control of the infant child of this marriage, LINDA SUE ALDERMAN, AND ordering the respondent to pay a reasonable sum monthly to your complainant for the support and maintenance of said child; and your complainant prays for such other, further, different or general relief as in equity and good conscience she may be entitled to receive, and, as in duty bound, she will ever pray, etc.

William H. Maddebury, Jr.
SOLICITOR FOR COMPLAINANT.

BOOK 022 PAGE 33

AUDREY MAE ALDERMAN,
Complainant,
VS.
WILLIAM EARNEST ALDERMAN,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

WAIVER AND ANSWER.

Comes the respondent in the above cause and accepts service of the bill of complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross the 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 at any time.

And for answer to the bill of complaint heretofore filed in said cause, respondent says:

1. He admits the allegations contained in paragraph 1 of said bill of complaint.
2. He admits the allegations contained in paragraph 2 of said bill of complaint.
3. He denies each and every allegation contained in paragraph 3 of said bill of complaint, and demands strict proof of the same.
4. He admits the allegations contained in paragraph 4 of said bill of complaint.

William E Alderman

WITNESS:

M.T. Benton
Martha E. Eldredge

FILED
MAY 30 1927
CLERK OF DISTRICT COURT

AUDREY MAE ALDERMAN

vs.

WILLIAM EARNEST ALDERMAN

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, Waiver and Answer, and Testimony of AUDREY MAE ALDERMAN & O. V. CHANDLER.

and in behalf of Defendant upon Waiver and Answer

Jeffrey J. Marshall, Jr.

Archie J. Alcock
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

FILED
MAR 30 1957

WALTER J. DUCK, Register

Register.

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

AUDREY MAE ALDERMAN

Complainant

VS.

WILLIAM EARNEST ALDERMAN

Respondent

I,

~~Register and~~ Commissioner

have called and caused to come before me AUDREY MAE ALDERMAN AND Q. V. CHANDLER

witness named in the Requirement for Oral Examination, on the 30th day of March 1957, at the office of Telfair J. Mashburn, Jr., Esq., 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 AUDREY MAE ALDERMAN

doth depose and say as follows: "My name is Audrey Mae Alderman. I am the complainant in this cause and I am over the age of seventeen years. I have been a resident of this State for more than two years next preceding the filing of the bill of complaint in this cause. I was living in Mobile with my husband at the time I was forced to leave him, and since that time I have been living in Baldwin County, Alabama, near Bay Minette, with my Mother. William Earnest Alderman is over the age of twenty-one years and is presently, I am informed, in jail in Pensacola, Florida. I was married to William Earnest Alderman in Jackson County, Mississippi, on the 4th day of November, 1955, and we lived in Mobile, Alabama, until about the 15th day of May, 1956. Soon after we married, my husband began to display a violent temper, and when he was angry, he would beat me. On many occasions he cursed, threatened to kill me, and beat me. About the 15th day of May, 1956, he beat me severely and threatened to kill me, and I became convinced that it would be dangerous to my life to continue to live with him as his wife. Because of my fear, I left him at that time and came to Bay Minette to live with my Mother and have not since that time returned to live with him as his wife. I am informed that my husband has married several other women, and that he is now in jail in Pensacola, Florida, charged with bigamy. We have one child, born of this marriage, LINDA SUE ALDERMAN, who is now three months of age. I know my husband is not a fit and proper person to have the care, custody and control of this child. I feel that I am the proper person to have the care, custody and control of said child. I need help in supporting my child. I have no funds and cannot work out while she is so small. My husband, of course, has no income while he is in jail, but he is strong and able to work and should support his child. ~~XXXXXXX~~ I feel that he should be ordered to pay a nominal sum at the present time for the support of our child, which could be increased when he starts earning more." Further deponent says not.

Audrey Mae Alderman

The said Q. V. Chandler doth depose and say as follows: "My name is Q. V. CHANDLER. I am the Mother of the complainant. My daughter has been living with me since about the 15th day of May, 1956, when her husband, WILLIAM EARNEST ALDERMAN, beat her up and put her on the bus in Mobile and sent her home. I have not actually seen her husband strike her, but I have heard him make some terrible threats against her. I know that, according to the newspapers, he has married several women without getting a divorce from any of them, and in my opinion it would not be safe for my daughter to attempt to live with him as his wife." My daughter has been living with me since last May and has not in any way recognized the said William Earnest Alderman as her husband during that period." Further Deponent says not.

Mrs. Q. V. Chandler

ORAL EXAMINATION.

I, James R. Owen, 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 me and they signed the same in the presence of myself and Telfair J. Mashburn, Jr.

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proof 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 30th day of March, 1957

 (L. S.)

NO. _____	PAGE _____
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
AUDREY MAE ALDERMAN	
vs.	Complainant
WILLIAM EARNEST ALDERMAN	
	Respondent.
Oral Deposition	
Filed FILED	195 _____
MAR 30 1957	Register.
MADE BY: DICK Register	
Vol. _____	Page _____
_____	Register
_____	Record

AUDREY MAE ALDERMAN
Complainant
vs.
WILLIAM EARNEST ALDERMAN
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: AUDREY MAE ALDERMAN & Q. V. CHANDLER

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

Jeffrey J. Madbury
Solicitor for Complainant

NOTE:

Complainant suggests the name of JAMES R. OWEN
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Jeffrey J. Madbury
Solicitor for Complainant

DEMAND FOR ORAL EXAMINATION

AUDREY MAE ALDERMAN

Complainant

vs.

WILLIAM EARNEST ALDERMAN

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this 30th day of March

1957

FILED

MAR 30 1957

MAIGE J. DUCK, Register

Register

Moore Printing Co.

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: JAMES R. OWEN, Esq.

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 AUDREY MAE ALDERMAN & Q. V. CHANDLER

as witnesses in behalf of AUDREY MAE ALDERMAN in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

AUDREY MAE ALDERMAN

is the _____, Complainant
and WILLIAM EARNEST ALDERMAN

IS the _____ Respondent

on oath, to be by you administered, upon _____ them
to take and certify the deposition s of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness 30th day of March, 1957

Alicia J. Alderman
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

**THE STATE OF ALABAMA
Baldwin County**

CIRCUIT COURT

Complainant _____

VS.

Defendant _____

COMMISSION TO TAKE DEPOSITION

COMMISSIONER: _____

WITNESSES: _____

3985

[Faint, mostly illegible text from the reverse side of the document is visible through the paper. Some words like "deposition" and "witness" are faintly discernible.]