5992

DIVORCE DECREE Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

LAWRENCE A. GRASS, Complainant

vs.

VELMA MARIE GRASS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on answer and waiver ~~not~~ 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 Lawrence A. Grass is forever divorced from the said Velma Marie Grass for and on account of Voluntary Abandonment - -

It is further ordered, adjudged and decreed that the Complainant be and he is hereby awarded the permanent care, custody and control of the minor children, born to the union of said parties, namely, Lawrence A. Grass, Jr., aged four; Janell Marie Grass, aged three, and Darnell Marie Grass, aged three; with rights of visitation being hereby awarded the Respondent at all reasonable times.

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 Lawrence A. Grass the Complainant pay the cost herein to be taxed, for which executed may issue.

This 15th day of March 1957

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. 3992 Page

THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

LAWRENCE A. GRASS

Complainant

vs.

VELMA MARIE GRASS

Respondent

DIVORCE DECREE

FILED
MAR 15 1957
Alice J. Parker, Register

S331. NOTE OF TESTIMONY

Printed by the Baldwin Times, Bay Minette, Alabama.

LAWRENCE A. GRASS

vs.

VELMA MARIE GRASS

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, answer and waiver and testimony of Lawrence A. Grass and Noah B. Calloway, Jr. as set out in the oral deposition

and in behalf of Defendant upon

James A. Hendrix

Register.

No. .....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

LAWRENCE A. GRASS

vs.

VELMA MARIE GRASS

NOTE OF TESTIMONY

Filed in Open Court this .....

day of ....., 194 .....

Register.

Printed by the Baldwin Times

8581—NOTE OF TESTIMONY

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

LAWRENCE A. GRASS

vs.

VELMA MARIE GRASS

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~~ Petition, and testimony of Velma Marie Grass and Kathrine Johnson

and in behalf of ~~Defendant~~ Complainant upon Decree Pro Confesso on Personal Service

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Lawrence A. Grass

VS.

Velma Marie Grass

Note of Testimony

Filed in Open Court this 23

day of Aug, 1928

Register.

MOORE PRINTING CO., BAY MINETTE, ALA.

ORAL DEPOSITION

THE STATE OF ALABAMA BALDWIN COUNTY	Circuit Court of Baldwin County, Alabama (In Equity)

LAWRENCE A. GRASS COMPLAINANT

vs.

VELMA MARIE GRASS RESPONDENT

I, Ophelia J. Quinley

as Register and Commissioner

have called and caused to come before me Velma Marie Grass and Kathrine Johnson

witnesses named in the requirement for Oral Examination, on the 23rd day of August

19 58 , at the office of John V. Duck, Fairhope, Alabama

in , Alabama, and having first sworn said witness es to speak the

truth, the whole truth, and nothing but the truth, the said Velma Marie Grass and

Kathrine Johnson doth depose and say as follows:

Deposition of Velma Marie Grass

MY name is Velma Marie Grass. I am the Respondent-Petitioner in the above styled cause, and am over the age of twenty-one years and a resident citizen of Baldwin County, Alabama; the Complainant in the above styled cause, Lawrence A. Grass, is over the age of twenty-one years and a citizen of Alabama.

The Complainant, Lawrence A. Grass and myself were divorced on the 15th day of March, 1957 by a decree rendered in the Circuit Court of Baldwin County, Alabama, and in which divorce decree, the Complainant Lawrence A. Grass was given the custody of our three minor children, Lawrence A. Grass Jr., Janell Marie Grass, and Darnell Marie Grass. I, the Respondent, was given the right of visitation at reasonable and proper times of my said minor children.

The complainant, Lawrence A. Grass, kept the children at his mother's at Point Clear until on to-wit the 29th day of June, 1958.

At this time the Complainant's mother brought to me Janell Marie Grass and Darnell Marie Grass, and voluntarily relinquished their custody care and control in me. These two minor children have been with me ever since that time.

The Complainant, Lawrence A. Grass took our minor son, Lawrence A. Grass Jr., and removed himself to Mobile, Alabama, and I have not seen nor heard from him since that time.

Since the rendition of the final decree of divorce on the 15th of March, 1957, the Complainant has proved himself to be an unfit person to have the care, custody and control of our said minor children, in that he drinks to excess and runs around at night carrying our minor son Lawrence A. Grass Jr., with him, keeping him up at all hours of the night and he is now improperly fed and improperly clothed.

That I am a fit and proper person to have the care, custody and control of all three of the said minor children and that I have a suitable place to keep the said minor children.

That the Complainant, Lawrence A. Grass has become addicted to the use of alcohol to such an extent that I now fear for the safety of our minor son Lawrence A. Grass Jr.

see attached page

ORAL EXAMINATION

I, Ophelia J. Quinley as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to me and I signed the same in the presence of myself and John V. Duck

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es ; 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 23rd day of August, 1958.

Ophelia J. Quinley (L. S.)

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

Filed , 19 , Register.

RECORDED IN Record

Vol. Page

, Register.

That the Complainant, Lawrence A. Grass , removed the said minor child to Mobile without my consent, and that I have not seen him since that time.

Velma Marie Grass

Velma Marie Grass

TESTIMONY OF KATHRINE JOHNSON

My name is Kathrine Johnson. I am a friend of the Respondent-Petitioner in the above styled cause. I know from my own knowledge that on the 29th day of June, 1958, the grandmother of Janell Marie Grass and Darnell Marie Grass brought the said minor children to the home of Velma Marie Grass and left them with her voluntarily.

I also known of my own knowledge that the Complainant Lawrence A. Grass removed Lawrence A. Grass Jr., to Mobile and that the Respondant-Petitioner has not seen her son since that time.

I also know from my own knowledge that the Complainant, Lawrence A. Grass, is not a fit and proper person to have the care, custody and control of the said minor children and I also know of my own knowledge that the Petitioner-Respondent, Velma Marie Grass is a fit and proper person to have the said minor children's care, custody and control.

Kathrine Johnson

Kathrine Johnson

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Ophelia J. Quinley

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 Velma Marie Grass and Kathrine Johnson

a witness in behalf of Velma Marie Grass in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Lawrence A. Grass, Complainant

and

Velma Marie Grass Respondent

on oath, to be by you administered, upon Velma Marie Grass and Kathrine Johnson to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness es 23rd day of August, 1958.

Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

LAWRENCE A. GRASS

Complainant

VS.

VELMA MARIE GRASS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Ophelia J. Quinley

WITNESSES:

Velma Marie Grass
Kathrine Johnson

386 FAIRHOPE AVE.

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.

July 15th

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Ala.

Dear Miss Alice:

The wrong person was served in this case through my error. Please get the petition back from the sheriff and attchethe enclosed summons.

Sincerely

John

LAWRENCE A. GRASS

RESIDES IN MOBILE. WORKES AT

BROOKLEY FIELD

LAWRENCE A. GRASS,	)	
Complainant,	)	IN THE CIRCUIT COURT OF
vs.	)	BALDWIN COUNTY, ALABAMA
VELMA MARIE GRASS,	)	IN EQUITY.
Respondent.	)	

ANSWER AND WAIVER

Comes now the Respondent, Velma Marie Grass, and for answer to the Bill of Complaint heretofore filed against her in said cause says as follows:

1. That she denies each and every allegation of the said Bill of Complaint and demands strict proof thereof.

And for further answer to said Bill of Complaint the Respondent hereby accepts service of a copy and notice of the filing of the said Complaint and hereby waives any further notice to him of the day set for hearing, the taking of testimony or the submission for final decree of the above styled cause and does here consent that the same may be submitted and testimony taken without further notice to her.

Velma Marie Grass
Velma Marie Grass

Sworn to and subscribed before me
this 12 day of March, 1957.

Notary Public, Baldwin County, Alabama.

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

ANSWER AND WAIVER

LAWRENCE A. GRASS,
Complainant,
vs.
VELMA MARIE GRASS,
Respondent.

ORAL DEPOSITION

Printed by The Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

LAWRENCE A. GRASS COMPLAINANT

vs.

VELMA MARIE GRASS RESPONDENT

I, GERTRUDE M. BANKESTER

as ~~Register and~~ Commissioner

have called and caused to come before me Lawrence A. Grass and Noah B. Calloway, Jr.

witness es named in the requirement for Oral Examination, on the 13 day of March 19 57, at the office of James A. Hendrix

in Robertsdale, Alabama, and having first sworn said witness es to speak the truth, the whole truth, and nothing but the truth, the said Lawrence A. Grass and Noah B. Calloway, Jr. doth depose and say as follows:

My name is Lawrence A. Grass, I am over the age of twenty-one years and a resident of Baldwin County, Alabama, and have lived there for more than one year. Velma Marie is over the age of twenty-one years and is residing in Fairhope, Alabama; Velma Marie and I were married on or about July 25, 1952, at Perry County, Mississippi. On February 15, 1956, Velma Marie voluntarily left me, and since that time we have not lived together as husband and wife. Velma Marie and I had three children, Lawrence A. Grass, Jr., a boy, aged 4 years, twin girls, Janell Marie Grass and Darnell Marie Grass, aged three years. Said minor children are now in my care, custody and control, and I feel that I am a fit and proper person to be awarded the permanent care, custody and control of said minor children. There were no property to be settled between us.

Lawrence A Grass

I have known Lawrence A. Grass and Velma Marie Grass for more than the past 15 years. Lawrence is over twenty-one years old, and a resident of Baldwin County. Velma Marie is over twenty-one years of age and is residing in Fairhope, Alabama. Lawrence and Velma Marie were married July 25, 1952, at Perry County, Mississippi. On February 15, 1956, Velma Marie left Lawrence of her own free will and accord, and since that time they have not lived together as husband and wife. Lawrence and Velma Marie had three children, Lawrence A. Grass, Jr., a boy, aged 4 years, Janell Marie Grass and Darnell Marie Grass, twin girls, aged 3 years. Said minor children are now in the care, custody and control of Lawrence Grass, and I feel that he is a fit and proper person to be awarded the permanent care, custody and control of said minors. There were no property to be settled between them.

Noah B. Calloway Jr.

ORAL EXAMINATION

Printed by The Baldwin Times

I, GERTRUDE M. BANKESTER as ~~Register and~~ Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presence of myself and James A. Hendrix at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; 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 13 day of March, 1957.

Gertrude M. Bankester (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

LAWRENCE A. GRASS
COMPLAINANT

vs.

VELMA MARIE GRASS
RESPONDENT

ORAL DEPOSITION

Filed _____, 19__

_____, Register.

RECORDED IN

_____ Record

Vol. _____ Page _____

_____, Register.

COMMISSION TO TAKE DEPOSITIONS B.T.-500-11-54

THE STATE OF ALABAMA
Baldwin County } Circuit Court

TO: GERTRUDE M. PANKESTER

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 Lawrence A. Grass and Noah B. Calloway, Jr.

a witnesses in behalf of Lawrence B. Grass in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Lawrence B. Grass is

, Complainant

and Velma Marie Grass is

Respondent

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

Witness 13 day of March, 1957.

Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

LAWRENCE A. GRASS

Complainant

VS.

VELMA MARIE GRASS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

GERTRUDE M. PANKESTER

WITNESSES:

Lawrence A. Grass

Noah R. Calloway, Jr.

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No._____

_____TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LAWRENCE A. GRASS

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

VELMA MARIE GRASS, Defendant

by

LAWRENCE A. GRASS, Plaintiff

Witness my hand this_____day of_____19____

_____, Clerk

No._____ Page_____

The State of Alabama
Baldwin County

CIRCUIT COURT

~~LAWRENCE A. GRASS~~

Plaintiffs

vs.

~~VELMA MARIE GRASS~~

Defendants

Summons and Complaint

Filed_____19____

_____ Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

His Mother lives at Point Clear

Received In Office

_____ 19_____

_____, Sheriff

I have executed this summons

this_____19_____

by leaving a copy with

_____ Sheriff

_____ Deputy Sheriff

That since the time of this divorce, the Complainant has proven himself to be an unfit person to have the said children's care, custody and control, in that the Complainant was keeping the said minor children at the home of his mother until the 29th day of June, 1958; that on the 29th day of June, 1958, the complainant's mother brought Janell Marie Grass and Darnell Marie Grass to the home of your Petitioner and voluntarily relenquished possession of the two said minor children.

That the Complainant in the above style cause took Lawrence A. Grass Jr. and removed him to the City of Mobile, and that your Petitioner has not seen nor heard from the said Lawrence A. Grass Jr., or Lawrence A. Grass, the Complainant in the above styled cause since that time.

That the Complainant in the above styled cause, Lawrence A. Grass, has now proven himself to be an unfit person to have the said children's care, custody and control.

IV

The Respondent further avers that she has a comfortable place for the said minor children and she is a suitable person to have the care custody and control of her said three minor children.

PRAYER FOR PROCESS

WHEREFORE, the premises considered, your Petitioner prays that your Honor will by proper process make the said Lawrence A. Grass, a proper party to this cause of action, requiring him to plead, answer or demurer to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

WHEREFORE, the premises considered, your Complainant respectfully prays that on a final hearing of this cause, your Honor will enter a decree modifing the divorce decree heretofore referred to rendered on the 15th day of March, 1957, so as to grant to your petitioner the permanent care, custody and control of Lawrence A. Grass Jr, Janell Marie Grass and Darnell Marie Grass.

Your Complainant prays for such other, further or different relief as in the premises she may be entitled to receive.

Respectfully submitted,

John V. Duck, Attorney for
Petitioner amd Respondent

8600 Motion for Decree Pro Confesso on Personal Service. 3107 Code MPCO.

THE STATE OF ALABAMA,
Baldwin County } No._____Circuit Court, In Equity.

LAWRENCE A. GRASS Complainant

Vs.

VELMA MARIE GRASS Defendant

Motion is hereby made for a Decree Pro Confesso against Lawrence A. Grass

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23rd day of August 1975

Solicitor.

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

LAWRENCE A. GRASS

Vs.

VELMA MARIE GRASS

Motion for Decree Pro Confesso on Personal Service

Filed _____ 19 _____

_____
Register.

Recorded in _____ Record

Vol. _____ Page _____

_____
Register.

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

LAWRENCE A. GRASS,
Complainant,
Vs.
VELMA MARIE GRASS,
Respondent.

In the Circuit Court.
In Equity No._____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the ~~Respondent~~ Complainant Lawrence A. Grass

by the Sheriff of Baldwin County, on the 22nd day of July, 19~~x~~ 58.

And it further appears to the Register, that the said Lawrence A. Grass

~~Respondent~~ Complainant, the ~~Complainant~~ Respondent, having to the date hereof, failed to plead, demur to or answer the ~~Bill of Complaint~~ Petition filed in this cause, it is now, therefore, on motion of John V. Duck Solicitors for ~~Complainant~~ Petitioner, ordered, and decreed by the Register that the ~~Bill of Complaint~~ Petition in this cause be, and it hereby is, in all things taken as confessed against the said Lawrence A. Grass

This 23rd day of August, 19~~x~~58.

Alice J. Alsobrook
Register.

No._____

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY

LAWRENCE A. GRASS

Complainant,

Vs.

VELMA MARIE GRASS

Respondent.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

Issued this____day of _____,

194____.

Register.

Baldwin Times Print

8600 Motion for Decree Pro Confesso on Personal Service. 3107 Code MPCO.

THE STATE OF ALABAMA,
Baldwin County } No._____Circuit Court, In Equity.

LAWRENCE A. GRASS _____ Complainant___

Vs.

VELMA MARIE GRASS _____ Defendant____

Motion is hereby made for a Decree Pro Confesso against Lawrence A. Grass

_____ Defendant____

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant ____; and that said summons was duly served according to law, and that said Defendant __ has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23rd day of August 1978

_____ Solicitor.

No._____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court, In Equity

LAWRENCE A. GRASS

Vs.

VELMA MARIE GRASS

Motion for Decree Pro Confesso on Personal Service

Filed _____ FILED _____ 19 _____

AUG 28 1958 Register.

ALICE J. DUCK, CLERK REGISTER

Recorded in _____ Record

Vol._____ Page _____

Register.

CIRCUIT COURT COMPLAINT

Printed By Baldwin Times, Bay Minette, Ala.

LAWRENCE A. GRASS,
Complainant,
Vs.
VELMA MARIE GRASS,
Respondent.

In the Circuit Court.

In Equity No.———.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the ~~Respondent~~ Complainant

Lawrence A. Grass

by the Sheriff of Baldwin County, on the 22nd day of July,

19~~x~~ 58

And it further appears to the Register, that the said Lawrence A. Grass

~~XXXXXXXXXX~~ Complainant, the ~~XXXXXXXXXX~~ Respondent, having to the date hereof, failed to plead, demur to or answer the ~~XXXXXXXXXX~~ Petition ~~XXXXXXXXXX~~ filed in this cause, it is now, therefore,

on motion of John V. Duck Solicitors for ~~Complainant~~ Petitioner, ordered, and decreed by the Register that the ~~XXXXXXXXXX~~ Petition ~~XXXXXXXXXX~~ in this cause be,

and it hereby is, in all things taken as confessed against the said Lawrence A. Grass

This 23rd day of August, 19~~x~~58.

Alice J. Veach
Register.

No._____

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY

LAWRENCE A. GRASS

Complainant,

Vs.

VELMA MARIE GRASS

Respondent.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

Issued this____day of _____,

194____.

Register.

Baldwin Times Print

STATE OF ALABAMA)
BALDWIN COUNTY)

LAWRENCE A. GRASS,	)	IN THE CIRCUIT COURT OF
Complainant,	)	BALDWIN COUNTY, ALABAMA
vs.	)	IN EQUITY
VELMA MARIE GRASS,	)	
Respondent.	)	

To the Honorable Judge of the Circuit of Baldwin County,

Sitting in Equity:

Comes now the Complainant, LAWRENCE A. GRASS, humbly complaining in the Respondent, Velma Marie Grass, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, Lawrence A. Grass, is over the age of twenty-one years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State for more than one year next preceding the filing of this Bill of Complaint; that Respondent is over twenty-one years and is residing in Fairhope, Alabama.

SECOND: That your Complainant and Respondent were married on or about, to-wit: July 25, 1952, at Perry County, Mississippi.

THIRD: That Complainant further avers and shows unto your Honor that the said Respondent, Velma Marie Grass voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this Bill of Complaint, on to-wit: February 15, 1956, and since that time your Complainant and Respondent have at no time lived together, nor have they in any way recognized each other as husband and wife.

FOURTH: Your Complainant would further aver and show unto your Honor that there were three children born to the union of the Complainant and Respondent which are as follows: A boy, Lawrence A. Grass, Jr., who is four years old, A girl, Janell Marie Grass, who is three years old, and Darnell Marie Grass, a girl, who is three years old, said children are now in the care, custody and control of the Complainant, their father, who is a fit and proper person to be awarded the permanent care, custody, and control of said minor children.

PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said Velma Marie Grass be made party Respondent to this his Bill of Complaint and that a summons be issued and served upon her as required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent, and that in and by virtue of the said Decree the Complainant will be granted the right to again contract marriage; that in and by virtue of said decree the Complainant will be awarded the permanent care, custody and control of said children, Lawrence A. Grass, Jr., Janell Marie Grass, and Darnell Marie Grass.

Complainant prays all other further or general relief to which he may be entitled, the premises considered and he will ever pray, etc.

James A. Hendrix

LAWRENCE A. GRASS, Complainant -VS- VELMA MARIE GRASS Respondent	)	IN THE CIRCUIT COURT OF BLADWIN COUNTY, ALABAMA, IN EQUITY

PETITION FOR MODIFICATION

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

Comes now your Respondent in the above styled cause and files this her Petition and respectfully shows unto the Court and your Honor as follows:

I

That the Respondent is over the age of twenty-one year; that she is a bona fide resident and citizen of the State of Alabama and now resides in Fairhope, Alabama; that she has been a bona fide resident and citizen of the State of Alabama for more than one year next preceeding the time of filing of this petition; that the Complainant, Lawrence A. Grass, is over the age of twenty-one years and is a resident citizen of Baldwin County, Alabama.

II

That the Respondent and the Complainant were permanently divorced from the bonds of matrimony by a decree rendered out of the Circuit Court of Baldwin County, Alabama, on the 15th day of March, 1957 for and on account of abandonment on the part ofyour said petitioner.

III

That there were born to the union of the Respondent -Petitioner and the Complainant three children, Lawrence A. Grass Jr., five years of age, Janell Marie Grass four years of age, and Darnell Marie Grass, four years of age; that by said decree the Complainant, Lawrence A. Grass, was awarded the care, sustody and control of the said minor children, giving the Respondent the right to visit the said minor children and have them to visit with her at reasonable and proper times.

That since the time of this divorce, the Complainant has proven himself to be an unfit person to have the said children's care, custody and control, in that the Complainant was keeping the said minor children at the home of his mother until the 29th day of June, 1958; that on the 29th day of June, 1958, the complainant's mother brought Janell Marie Grass and Darnell Marie Grass to the home of your Petitioner and voluntarily relenquished possession of the two said minor children.

That the Complainant in the above style cause took Lawrence A. Grass Jr. and removed him to the City of Mobile, and that your Petitioner has not seen nor heard from the said Lawrence A. Grass Jr., or Lawrence A. Grass, the Complainant in the above styled cause since that time.

That the Complainant in the above styled cause, Lawrence A. Grass, has now proven himself to be an unfit person to have the said children(s care, custody and control.

IV

The Respondent further avers that she has a comfortable place for the said minor children and she is a suitable person to have the care custody and control of her said three minor children.

PRAYER FOR PROCESS

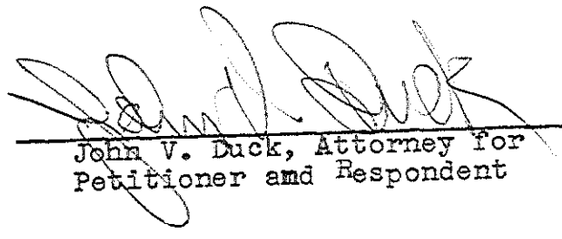
WHEREFORE, the premises considered, your Petitioner prays that your Honor will by proper process make the said Lawrence A. Grass, a proper party to this cause of action, requiring him to plead, answer or demurer to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

WHEREFORE, the premises considered, your Complainant respectfully prays that on a final hearing of this cause, your Honor will enter a decree modifing the divorce decree heretofore referred to rendered on the 15th day of March, 1957, so as to grant to your petitioner the permanent care, custody and control of Lawrence A. Grass Jr, Janell Marie Grass and Darnell Marie Grass.

Your Complainant prays for such other, further or different relief as in the premises she may be entitled to receive.

Respectfully submitted,



John V. Duck, Attorney for
Petitioner amd Respondent

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

No.

Circuit Court, Baldwin County

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon VELMA MARIE GRASS

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

VELMA MARIE GRASS, Defendant

by LAWRENCE A GRASS

, Plaintiff

Witness my hand this 8th day of July 1958

Alice J. Kluck, Clerk

No. 3792 A Page

The State of Alabama
Baldwin County

CIRCUIT COURT

LAWRENCE A. GRASS

Plaintiffs

vs.

VELMA MARIE GRASS

Defendants

Summons and Complaint

Filed K July 7, 1958 19

Alice J. Duck Clerk

Respondent lives at Fairhope.

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

7/9 1958

, Sheriff

I have executed this summons

this 10 July 1958

by leaving a copy with

Velmer Marie Grass

Sheriff claims 70 miles at

Ten Cents per mile Total $ 7.00

TAYLOR WILKINS, Sheriff

BY Reuben

DEPUTY SHERIFF

Taylor Wilkins Sheriff

Ted Pierce Jr. Deputy Sheriff

70 mi
Fairhope

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

No.

Circuit Court, Baldwin County

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon LAWRENCE A. GRASS

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

VELMA MARIE GRASS, Defendant

by

LAWRENCE A. GRASS, Plaintiff

Witness my hand this 16 day of July 1958

Executed 7/22/58
By service on.
Lawrence A. Grass

Clerk

By Taylor Wilkins, Sheriff
Leiser. D.S.

146

No. 3992A Page 1133

The State of Alabama
Baldwin County

CIRCUIT COURT

LAWRENCE A. GRASS

Plaintiffs

NWA vs.

VELMA MARIE GRASS

Defendants

Summons and Complaint

Filed _____ 19____

_____ Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

His Mother lives at Point Clea

Received In Office

7/16 1958

_____, Sheriff

I have executed this summons

this 7/22 1958

by leaving a copy with

Lawrence A. Grass

Returned July 25 1958.
Without Action By Order of Baldwin Co.
RAY D. BRIDGES, Sheriff
BY E. King D.S.

Sheriff claims 70 miles at
Ten Cents per mile Total $ 7.00
TAYLOR WILKINS, Sheriff
BY Jesse
DEPUTY SHERIFF

Taylor Wilkins Sheriff

Jesse Deputy Sheriff

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Ophelia J. Quinley

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 Velma Marie Grass and Kathrine Johnson

a witness in behalf of Velma Marie Grass in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Lawrence A. Grass, Complainant

and

Velma Marie Grass Respondent

on oath, to be by you administered, upon Velma Marie Grass and Kathrine Johnson to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness es 23rd day of August, 1958.

Alice J. Reicke
Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

LAWRENCE A. GRASS

Complainant

VS.

VELMA MARIE GRASS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Ophelia J. Quinley

WITNESSES:

Velma Marie Grass
Kathrine Johnson

LAWRENCE A. GRASS Complainant -VS- VELMA MARIE GRASS Respondent	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY

D E C R E E

This cause coming on to be heard was submitted upon petition, on decree pro confesso on personal service and testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Petitioner is entitled to the releif prayed for in said bill.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED, by the Court that the decree of divorce rendered out of this Court on the 15th day of March, 1957, be and it is hereby modify to read that the care custody and control of Lawrence A. Grass Jr., Janell Marie Grass, and Darnell Marie Grass, be and is hereby awarded the care custody and control to Velma Marie Grass, the Petitioner in the above style cause.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the Complainant, Lawrence A. Grass be permitted to visit the said minor children at reasonable and proper times.

IT IS FURTHER ORDERED THAT, the Petitioner Velma Marie Grass pay the cost herein to be taxed, for which execution may issue.

This the 26th day of August, 1958

Hubert M Hare
Judge of Circuit Court in Equity.

LAWRENCE A. GRASS

Complainant

-VS-

VELMA MARIE GRASS

RESPONDENT-
Petitioner

- - - - - - - - - - - - - - - - - - -

DECREE

FILED
AUG 26 1958
ALICE J. DUCK, CLERK
REGISTER

LAWRENCE A. GRASS	X	
Complainant	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
VELMA MARIE GRASS HALL	X	IN EQUITY NO. 3992
Respondent	X	

TO: THE HONORABLE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY AND TO THE HONORABLE TELFAIR J. MASHBURN, JUDGE THEREOF:

Comes your petitioner, the undersigned Lawrence A. Grass, and respectfully represents and shows unto your Honor and unto this Honorable Court as follows:

-1-

That your complainant is over the age of 21 years and is presently a resident citizen of Mobile County, Alabama; and the respondent is over the age of 21 years and a resident citizen of Baldwin County, Alabama.

-2-

That your complainant and the respondent were previously married and of that marriage, Lawrence A. Grass, Jr., now age about 13 years was born.

-3-

That by decree of this Circuit Court, your petitioner was granted the care, custody and control of said child, but during the summer of 1965, allowed the said child to reside with his mother, Velma Marie Grass Hall, the respondent herein in the City of Fairhope.

-4-

That it has been necessary for your petitioner to resume possession of the said child, Lawrence A. Grass, Jr., and that he is in need of the clothes provided for the said child by your petitioner, which clothes are presently in the possession of the said respondent together with other clothes which have been accumulated for the benefit of said child and the child's possessions which may be on the premises occupied by the said respondent.

WHEREFORE, the premises considered, your complainant respectfully prays that upon the filing of this petition this Honorable Court will cause the respondent to be made a party

hereto by the service of process upon her in accordance with the statutes in such cases made and provided andthe rules of this Honorable Court.

Your complainant further prays that upon the filing of this petition this Honorable Court will enter an order or decree authorizing and instructing the Sheriff to recover the said items, clothes and possessions of the said Lawrence A. Grass, Jr., and deliver same to your petitioner herein.

Your complainant prays for such other, further and different order or decree as in the premises may be meet and proper.

RESPECTFULLY SUBMITTED,

Lawrence A. Grass

Lawrence A. Grass

STATE OF ALABAMA

BALDWIN COUNTY

Before me, C. LeNoir Thompson, a Notary Public, in and for said County, in said State, personally appeared Lawrence A. Grass, who is known to me and who, after being by me first duly and legally sworn did depose and say under oath as follows:

That his name is Lawrence A. Grass, and that he signed the foregoing petition and the facts alleged therein are true and correct and those matters which are alleged on information and belief he is informed and believes are correct.

Lawrence A. Grass

Lawrence A. Grass

Sworn to and subscribed before me
on this the 10 day of January
1966.

C. LeNoir Thompson

Notary Public, Baldwin County, Alabama

FILED
JAN 11 1966
ALICE L. BUCK, CLERK
REGISTER

LAWRENCE A. GRASS	X	
Complainant	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
VELMA MARIE GRASS HALL	X	IN EQUITY NO. 3992
Respondent	X	

ORDER

This day came Lawrence A. Grass and filed his verified petition in this Court in which he alleges that he and the respondent are the parents of Lawrence A. Grass, Jr., age 13 years; and that the said child having resided in the home of the respondent with the consent of the said complainant herein until it has become necessary in the opinion of the Court that the said child return to the possession as well as custody of the said complainant and the court having considered all of the above is of the opinion that an order this day be entered granting to the complainant the clothes and other items or possessions of the said Lawrence A. Grass, Jr. removing said possessions from the premises where Velma Marie Hall, the respondent herein resided with the said Lawrence A. Grass, Jr.

It is further ORDERED and DECREED by the Court that this order remain in force and effect until a final determination of this cause or until changed by further orders of this Court.

It is further ORDERED and DECREED by the Court that a copy of this Order be served upon the respondent along with a copy of the petition.

Done this 11th day of January, 1966.

Telfair A. Mallisham
Circuit Judge.

Case No-3992

Lawrence R. Grass
Compt.

vs.

Velma Marie Grass
Hall
Respt.

1. Petition
2. Order

FILED
JAN 17 1966
ALICE L. DUCK, CLERK
REGISTER

C. L. Thompson, Atty.

ceived 11 day of Jan 19 66
I on 25 day of Jan 19 66
erved a copy of the within Pet & Order
: Velma Marie Grass

service on

TAYLOR WILKINS, Sheriff
By Roy Randall D. S.

Fi' Page

Sheriff claims 70 miles at
Ten Cents per mile Total $ 7.00
TAYLOR WILKINS, Sheriff
BY Roy Randall
DEPUTY SHERIFF

STATE OF ALABAMA) IN THE CIRCUIT COURT OF
BALDWIN COUNTY) BALDWIN COUNTY, ALABAMA

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Lawrence A. Grass 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 Lawrence A. Grass, Defendant by Velma Marie Grass Hall, Plaintiff.

Witness my hand this 13 day of Nov, 1964.

Clerk

LAWRENCE A. GRASS,	)	IN THE CIRCUIT COURT OF
Complainant,	)	BALDWIN COUNTY, ALABAMA
vs.	)	IN EQUITY
VELMA MARIE GRASS HALL,	)	
Respondent.	)	CASE NO. 3992

TO HON TELFAIR J. MASHBURN, JUDGE OF SAID COURT, IN EQUITY SITTING:

Comes now your Petitioner, Respondent in above styled cause, and respectfully represent and show unto Your Honor as follows, to-wit:

ONE: Your Petitioner is over twenty-one years of age and is a resident of Fairhope, Baldwin County, Alabama; and the complainant in this cause is over twenty-one years of age and resides in Mobile County, Alabama.

TWO: That your Petitioner and the Complainant were granted a permanent decree of divorce from each other by the Circuit Court of Baldwin County, Alabama, on the 15th day of March, 1957, for and on account of abandonment on the part of your above said Respondent. And that the care, custody and control of the minor children born to said marriage, to-wit: Lawrence A. Grass, Jr., now age eleven years, Janell Marie Grass, now age ten years, and Darnell Marie Grass, now age ten years, was awarded to the Complainant, Lawrence A. Grass, but giving your Petitioner the right of visitation at all reasonable times.

THREE: That on the 26th day of August, 1958, the Judge of the Circuit Court Of Baldwin County, Alabama, modified by an Order the aforementioned decree of divorce referred to in paragraph TWO, above, so that the care, custody and control of the minor children born to

Vol-22-p-250-B

the wedlock of your Petitioner and the Complainant, was awarded to your petitioner, with the right of reasonable visitation by the Complainant in this cause, to-wit, Lawrence A. Grass.

FOUR: That on the 14th day of December, 1962, the Judge of the Circuit Court of Baldwin County, Alabama, modified the Order set forth in Paragraph Three above, by once again awarding the custody of aforementioned children back to the Complainant, Lawrence A. Grass, subject to rights of visitation at certain specified hours and days, which times and days amounted to the whole of the month of July, once each month for each of the other eleven months, together with Christmas week, allfor a total of thirteen times each year. And your Petitioner herein makes known unto your Honor that at the time of this particular Order of 14 December,1962, she had not remarried since she and the Complainant were divorced 15 March, 1957.

FIVE: That since the aforementioned order of 14 December, 1962, your Petitioner has remarried and now resides at 162 Pier Street, Fairhope, Alabama; that she has a home, in a good neighborhood, in which she can furnish the aforementioned children the necessary care, custody and control needed by each; that she can give each child the necessary attention and supervision needed for its best welfare and growth; and that she has employment during the day time, at the Grand Hotel, at Point Clear, Alabama, that will provide most of the money needed for the maintenance and support of aforesaid children.

PRAYER FOR PROCESS

Wherefore, the Premises Considered, your Petitioner prays that your Honor will, by proper process, make the Complainant, Lawrence A. Grass, a proper party to this cause of action, requiring him to plead, answer or demur to the same within the time and under the penalties allowed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF:

Wherefore, the Premises Considered, your Complainant respectfully prays that upon a final hearing in this cause, Your Honor will enter a decree or order modify aforementioned Order of 14

Vol - 22 - P - 250 - H.

December, 1962, so as to award the permanent care, custody and control of Lawrence A. Grass, Jr., Janell Marie Grass and Darnell Marie Grass to your Petitioner herein, subject to rights of reasonable visitation by the Complainant herein.

And your Petitioner prays for such other, further and different relief as in equity she may be entitled.

Velma Marie Grass-Hall
Complainant

Subscribed and sworn to before me this 4th day of November, 1964.

Kenneth Cooper
Notary Public, State At Large
State of Alabama

FILED
NOV. 13 1964
ALICE L. DUCK, CLERK
PROBATE

Vol-22-P-250-I

LAWRENCE A. GRASS	X	
Complainant	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
VELMA MARIE GRASS HALL	X	IN EQUITY NO. 3992
Respondent	X	

Comes Lawrence A. Grass in the above styled petition for modification on the part of the original respondent and for answer to said petition shows unto this Honorable Court as follows:

1. He admits the allegations of Count one.

2. He admits the allegations of Count two.

3. He admits the allegations of Count three, but shows unto this Honorable Court that the said modification was occasioned through an error of your petitioner's attorney at that time who failed to answer within thirty days the petition under which relief was granted to the respondent at that time.

4. As to Count four he denies the allegations thereof.

5. As to Count five that said Lawrence A. Grass denies the allegations of said Count and for further answer to Count five of said complaint shows unto this Honorable Court that upon recovering custody of said children on or about the 14th of December, 1962, yourpetitioner immediately placed them under the care and attention of the Board of School Commissioners of Mobile County psychologist, Floyd Replogle and there is attached hereto and made a part of this answer as Exhibit "A" a copy of the diagnosis of the children's condition upon entering school in Mobile County and an evaluation of the progress and requirements for continued progress by the said Floyd Replogle, school psychologist.

FILED
FEB 9 1965
ALICE L. DUCK, CLERK
REGISTER

THOMPSON & WHITE

BY: _____
Attorneys for complainant.

Vol. 23 - p - 250 - K

LAWRENCE A. GRASS Complainant	X	
vs	X	IN THE CIRCUIT COURT OF
	X	BALDWIN COUNTY, ALABAMA
VELMA MARIE GRASS HALL Respondent	X	IN EQUITY NO. 3992
	X	

Comes Lawrence A. Grass by his attorney of record and demurs to the petition of modification filed in the above styled cause on to-wit, November 13, 1964, and for demurrer shows unto this Honorable Court as follows:

1. That said respondent-petitioner in this cause failed to allege the date she remarried.

2. That for aught alleged in said petition, said respondent-petitioner, failed to allege the hours of her employment at Grand Hotel.

3. That for aught alleged in said petition, said respondent fails to allege any benefit a change in custody would give to the children, subject of said petition.

4. That for aught alleged in said petition, said respondent-petitioner fails to allege the said children are not being properly cared for or that their health, welfare or morals are being neglected.

THOMPSON & WHITE

BY: [signature]
Attorneys for complainant

FILED
DEC 17 1964
ALICE L. DUCK, CLERK
REGISTER

Vol. 23 p. 250-J

LAWRENCE A. GRASS	X	
Complainant	X	IN THE CIRCUIT COURT OF
vs	X	BALDWIN COUNTY, ALABAMA
VELMA MARIE GRASS HALL	X	IN EQUITY NO. 3992
Respondent	X	

DECREE

This cause coming on to be heard was submitted upon a petition to amend a decree of the Circuit Court of Baldwin County issued on December 14, 1962, and upon an answer thereon and testimony taken ore tenus and upon consideration thereof, the Court is of the opinion that the petitioner, Velma Marie Grass Hall, respondent in the original cause is not entitled to the relief prayed for in said petition.

It is therefore ORDERED, ADJUDGED and DECREED by the Court that the said petition to amend the decree of the Circuit Court of Baldwin County, Alabama, rendered on the 14th day of December, 1962, be and the same is hereby denied.

It is further ordered that Lawrence A. Grass, original complainant in said cause pay the costs herein to be taxed for which execution may issue.

This 2nd day of September, 1965.

Lafair G. Maddox
Judge, Circuit Court, In Equity.

FILED
SEP 3 1965
ALICE L. DICK, CLERK
REGISTER

Vol - p-42-B

LAWRENCE A. GRASS	)	IN THE CIRCUIT COURT OF
Complainant	)	BALDWIN COUNTY, ALABAMA
Vs.	)	IN EQUITY NO. 3992
VELMA MARIE GRASS HALL	)	
Respondent	)	

This cause coming on to be heard is submitted on demurrer to the complaint filed by the attorneys for complainant on 17 December, 1964, and the Court having benefit of oral argument by counsel for defendant and the plaintiff, and the Court having considered and understood the same, it is therefore

ORDERED, ADJUDGED AND DECREED that the demurrer filed by the plaintiff is hereby overruled, and the plaintiff is given thirty days in which to amend.

Done this 21st day of January, 1965.

Circuit Judge

FILED

MAR 4 1965

ALICE L. DUNN, CLERK REGISTER

Vol — p-42-A