(4008)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Mary N. Grimes, Complainant

vs.

James V. Grimes, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Detrer to Contest~~ on 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 Mary N. Grimes is forever divorced from the said James V. Grimes for and on account of cruelty. IT ISFURTHER ORDERED, ADJUDGED AND DECREED, By the Court, that the Complainant be and she is hereby awarded the care, custody and control of the minor children, James Vaughn Grimes, Jr., and Robert Jeffery Grimes, subject to the right of the Respondent to visit them at reasonable times and to have them visit him for reasonable periods of time.
IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Respondent pay to the Complainant the sum of ONE HUNDRED FIFTY ($150.00) DOLLARS on or before the first day of each month for the support, and maintenance of the minor children. It is further ordered that the agreement entered into by the complainant and respondent on the 4th day of April, 1957, be incorporated in this decree as if it were herein fully set out.

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 futher 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 James V. Grimes the Respondent pay the cost herein to be taxed, for which executed may issue.

This _____ day of _____ 19____

_____
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. 4008 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Mary N. Grimes

Complainant

vs.

James V. Grimes

Respondent

DIVORCE DECREE

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Mary N. Grimes, Complainant

vs.

James V. Grimes, Respondent

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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 Mary N. Grimes is forever divorced from the said James V. Grimes for and on account of cruelty. IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the Court, that the Complainant be and she is hereby awarded the care, custody and control of the minor children, James Vaughn Grimes, Jr., and Robert Jeffery Grimes, subject to the right of the Respondent to visit them at reasonable times and to have them visit him for reasonable periods of time.
IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Respondent pay to the complainant the sum of FOUR HUNDRED FIFTY ($450.00) DOLLARS on or before the first day of each month for the support, and maintenance of the minor children. It is further ordered that the agreement entered into by the complainant and respondent on the 4th day of April, 1957, be incorporated in this decree as if it were herein fully set out.

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 futher 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 James V. Grimes the Respondent pay the cost herein to be taxed, for which executed may issue.

This _____ day of _____ 19____

_____
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. 4008 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Mary H. Grimes

Complainant

vs.

James V. Grimes

Respondent

DIVORCE DECREE

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Mary N. Grimes, Complainant

vs.

James V. Grimes, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~[illegible]~~ on 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 Mary N. Grimes is forever divorced from the said James V. Grimes for and on account of cruelty. IT ISFURTHER ORDERED, ADJUDGED AND DECREED, By the Court, that the Complainant be and she is hereby awarded the care, custody and control of the minor children, James Vaughn Grimes, Jr., and Robert Jeffery Grimes, subject to the right of the Respondent to visit them at reasonable times and to have them visit him for reasonable periods of time.
IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Respondent pay to the Complainant the sum of ONE HUNDRED FIFTY ($150.00) DOLLARS on or before the first day of each month for the support, and maintenance of the minor children. It is further ordered that the agreement entered into by the complainant and respondent on the 4th day of April, 1957, be incorporated in this decree as if it were herein fully set out.

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 futher 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 James V. Grimes the Respondent pay the cost herein to be taxed, for which executed may issue.

This _____ day of _____ 19____

_____
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. 4008 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Mary H. Grimes

Complainant

vs.

James V. Grimes

Respondent

DIVORCE DECREE

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon JAMES V. GRIMES to appear and plead, answer or demur within thirty days from the service hereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by MARY N. GRIMES, as Complainant and against James V. Grimes, as Respondent.

Witness my hand this the _____ day of April, 1957.

_____
Register

- -

MARY N. GRIMES	)	
COMPLAINANT	)	IN THE CIRCUIT COURT OF
VS	)	BALDWIN COUNTY, ALABAMA,
JAMES V. GRIMES	)	IN EQUITY
RESPONDENT	)	

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

Your Complainant Mary N. Grimes, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and theRespondent are both over the age of twenty-one years, and are bona fide resident citi-ens of Baldwin County, Alabama.

2.

That your Complainant and the Respondent married at Pascagoula, Mississippi, on December 23, 1953, and lived together as husband and wife in Baldwin County, Alabama, until on, to-wit, April 1, 1957.

3.

That on, to-wit, April 1, 1957, and on various occasions prior thereto, the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person, which would necessarily endanger 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 continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent two children, James Vaughn Grimes, Jr., age 17 months old and Robert Jeffery Grimes, now 7 weeks old; that your Complainant is a fit and proper person to have the care, custody and control of the minor children.

5.

That your complainant and the Respondent have entered into a separation agreement concerning the custody, support and maintenance of the children, division of the property and other things; that the said agreement is attached hereto and marked Exhibit "A" and made a part hereof.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said James V. Grimes, party respondent to this cause of action, 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 prays that upon a final hearing hereof your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that your Complainant be awarded the permanent care, custody and control of the minor children, James Vaughn Grimes, Jr., and Robert Jeffery Grimes; your complainant prays further that the separation agreement entered into by and between the complainant and the respondent be incorporated and made a part of the decree; your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY: Gary J Wilters, Jr

Solicitors for the Complainant

STATE OF ALABAMA

BALDWIN COUNTY

AGREEMENT OF PARTIES CONTEMPLATING DIVORCE

THis agreement made and entered into on this the 4th day of April, 1957, by and between Mary N. Grimes, hereinafter referred to as the Party of the First Part, and JAMES V. GRIMES, hereinafter referred to as Party of the Second Part: WITNESSETH:

Whereas the parties hereto have been husband and wife for a period of three years and as a result of such union have two children, James Vaughn Grimes, Jr., now 17 months old and Robert Jeffery Grimes, now 7 weeks old; and

Whereas, the parties have definitely concluded that under conditions now existing it is impractical for them to live together as man and wife.

Now, therefore, in consideration thereof, and of the mutual agreement hereinafter made, they have mutually agreed to a complete separation under the following express terms and conditions:

1. That the Parties shall entirely and completely separate as man and wife, live separate and apart, and neither party hereafter shall in any way harass, threaten, intimidate or otherwise act in any way so as to embarrass or humiliate the other party.

2. The Party of the First Party shall have the custody, control and support of the said children and the Party of the Second Party shall be allowed to visit the children at reasonable times and to have the children to visit him at reasonable times and for reasonable periods of time.

3. The Party of the Second Party agrees to pay to the Party of the First Part for the support and maintenance of the said children, James Vaughn Grimes and Robert Jeffery Grimes on or before the 1st day of each month the sum of ONE HUNDRED FIFTY ($150.00) DOLLARS. It is agreed by and between the Party of the First Party that she is not asking any alimony or support for herself. In lieu of alimony, support and maintenance the Party of the First Part has agreed and accepted and receipt is hereby acknowledged of the lump sum of THREE THOUSAND ($3000.00) DOLLARS.

4. It is agreed by the Party of the First Part that she will execute deeds to the Party of the Second Part covering the real property jointly owned by them in the city of Loxley, Alabama. This property consist of two parcels. One of which is ten acres given to the Party of the First Party and the Party of the Second Part by the father of the Second Part, James C. Grimes, and the second parcel consists of two lots in the city of Loxley with the residence on it, the greater portion having been paid thereon by the Party of the Second part's father, James C. Grimes.

5. The parties have divided the personal property satisfactory to both of them.

This agreement has been made and executed by the parties hereto on the day and date herein above set forth, in good faith, with full understanding of all its provisions and the mutual promise on the part of each to comply therewith faithfully and completely.

Witness our hands and seals this 4 day of April, 1957.

Mary N. Grimes (SEAL)

James V. Grimes (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, Evelyn Watts, a Notary Public, in and for said County, in said State, hereby certify that Mary N. Grimes, and James V. Grimes, whose names are signed to the foregoing instrument, and who are known to me, acknowledged before me on this day that, being informed of the contents of the instrument, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 4th day of April, 1957.

Evelyn Watts
Notary Public, Baldwin County, Alabama

4008

MARY N. GRIFFIS

COMPLAINANT

VS.

JAMES V. GRIFFIS

RESPONDENT

BILL OF COMPLAINT
AND
ACKNOWLEDGMENT

FILED

APR 4 1957

ALICE L. DECK, Deputy

Printed by The Baldwin Times

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

Mary N. Grimes COMPLAINANT

vs.

James V. Grimes RESPONDENT

I, Evelyn Watts

as ~~Register and~~ Commissioner

have called and caused to come before me Mary N. Grimes and Harry J. Wilters Jr.

witness es named in the requirement for Oral Examination, on the 4th day of April 19 57, at the office of Harry J. Wilters Jr.

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 Mary N. Grimes and Harry J. Wilters, Jr. doth depose and say as follows:

ORAL EXAMINATION

Printed by The Baldwin Times

I, Evelyn Watts 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 [illegible]

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 4th day of April, 1957.

Evelyn Watts (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Mary H. Grimes
COMPLAINANT

vs.

James V. Grimes
RESPONDENT

ORAL DEPOSITION

Filed FILED APR 4 1957 19 _____, Register.

Record

Vol. _____ Page _____

_____, Register.

4008

My name is Mary N. Grimes and I am the Complainant in this divorce suit. James V. Grimes is the Respondent and we are both over the age of twenty-one years and residents of Baldwin County, Alabama. We have two children, James Vaughn Grimes, 17 months old and Robert Jeffery Grimes, 7 weeks old born to this marriage and I feel that I am a fit and proper person to have the care, custody and control of them. On April 1, the Respondent threatened, cursed and threatened to do bodily harm to me, the results of which if he had carried out his threats would have necessarily endangered my life and health and I did believe that he would carry out his threats. There have been occasions prior to this that the Respondent has threatened to do me bodily harm and I do believe that if I continued to live with him that he would carry out his threats which would result in great bodily harm. The Respondent and I were married on December 3, 1953, at Pascagoula, Mississippi. The Respondent and I have entered into a separate agreement concerning the custody of the children, support and maintenance for them, property settlement and other things which I would like the court to incorporate in this decree.

Mary N. Grimes

My name is Harry J. Wilters Jr., and I am a personal friend of both the Complainant and Respondent. I have known them closely for the last several years and I know that they have had considerable amount of difficulty during their married life and that I believe that if they continue to live together their condition will become worse.

Harry J. Wilters, Jr.

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

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Evelyn Watts

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 Mary N. Grimes and Harry J. Wilters Jr.

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Mary N. Grimes is

, Complainant

and James V. Grimes is

Respondent

on oath, to be by you administered, upon Mary N. Grimes and Harry J. Wilters Jr.

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 4 day of April, 195 7

Alice J. [illegible]
Register.

Commissioner's Fee, $

Witness' Fees, $

No._____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mary H. Grimes

Complainant

VS.

James V. Grimes

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

FILED
APR 4 1984
Regist

WITNESSES:

Mary H. Grimes

Harry J. Wilters Jr.

8581. NOTE OF TESTIMONY.

Printed by the Baldwin Times, Bay Minette, Alabama.

Mary M. Grimes

vs.

James V. Grimes

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 of the respondent, agreement between the parties as to custody, support and maintenance of the minor children, and testimony of Mary M. Grimes and Harry J. Williers Jr.

and in behalf of Defendant upon

Williers & Brantley
by Harry J. Williers Jr.

Register.

4008

No. .....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Mary M. Grimes

vs.

James V. Grimes

NOTE OF TESTIMONY

Filed in Open Court this .....

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

APR 4 1957

JAMES J. DUCK, Register

Register.

Printed by the Baldwin Times

MARY N. GRIMES	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA,
VS	)	IN EQUITY
JAMES V. GRIMES	)	
RESPONDENT	)	

Now comes the Respondent, in his own proper person, and admits the allegations contained in the Bill of Complaint filed in the above styled cause as to ages, residences, marriage and children; but denies all other allegations therein contained and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

James V. Grimes

STATE OF ALABAMA
BALDWIN COUNTY

I, Evelyn Watts, a Notary Public, in and for said County, in said State, hereby certify that James V. Grimes, 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 said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 4th day of April, 1957.

Evelyn Watts
Notary Public, Baldwin County, Alabama.

4008

MARY H. GRIMES

CONPLAINANT

VS

JAMES V. GRIMES

RESPONDENT

ANSWER AND WAIVER

FILED
APR 4 1957
ALICE M. BUCK, Register