

THEADORE ROOSEVELT CHESTANG
Complainant

No. 4010 Vs.

LILLIE PEARL CHESTANG
Defendant

IN THE CIRCUIT COURT OF
~~BALDWIN~~
~~MOBILE~~ COUNTY, ALABAMA
IN EQUITY

ANSWER AND WAIVER

Comes the Defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegations of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

Lillie Pearl Chestang
Defendant

Note: The space below is intended for "Agreements Between the Parties."

Complainant and Defendant agree that Peggy Preston, may take the testimony in this cause as commissioner, without the issuance of a commission.

Defendant hereby waives and releases the Complainant from all claims of alimony and support, both temporary and permanent.

Complainant agrees to pay all Court Costs and Attorney's fees incident to these Court proceedings.

Lillie Pearl Chestang
DEFENDANT.

Theadore R. Chestang
COMPLAINANT.

STATE OF FLORIDA

COUNTY OF ESCAMBIA

I, John E. Tucker, Jr., a NOTARY PUBLIC in and for said State and County, do hereby certify that Lillie Pearl Chestang, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, she executed the same voluntarily on the day same bears date.

Witness my hand and seal this 7th day of April, 1957.

Filed, _____
W. ELSWORTH HAUGHTON, REGISTER

John E. Tucker, Jr.
NOTARY PUBLIC
My Commission Exp. June 21, 1958
STATE OF FLORIDA
COUNTY OF ESCAMBIA

No. _____

Vs.

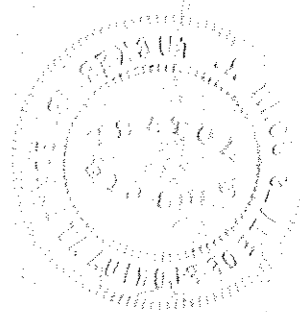
ANSWER AND WAIVER

Filed **FILED** 19

APR 9 1957

ALICE J. DUCK, Register

Register



THEADORE ROOSEVELT CHESTANG, 9 IN THE CIRCUIT COURT
 Complainant, | OF
-vs- | BALDWIN COUNTY, ALABAMA
LILLIE PEARL CHESTANG, | IN EQUITY:
 Respondent. | NO. _____

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and unto
this Honorable Court as follows:

ONE

Complainant is the husband of the Respondent and they were
married to each other on October 11, 1948 in Moss Point, Mississippi.
Both the Complainant and the Respondent are each over the age of
twenty-one years of age. The Complainant is a bona-fide resident
citizen of the State of Alabama, and has been such for more than
one year next preceding the filing of the Bill of Complaint herein.
The Respondent is a resident of Pensacola, Florida. There are
two minor children as issue of their marriage, Gwendolyn Chestang,
age seven years, and Glory Ann Chestang, age ten years.

TWO


Respondent voluntarily abandoned the bed and board of the
Complainant for more than one year next preceding the filing of
the Bill of Complaint herein.

PRAYER FOR PROCESS

Complainant prays that Yours Honors will take jurisdiction of
this cause, will make the said Lillie Pearl Chestang, party-respondent
hereto, and will cause her to appear, plead, answer or demur hereto
within the time allowed by law and the rules of this Honorable
Court.

PRAYER FOR RELIEF

Complainant prays that Your Honors will see fit to grant him an absolute divorce from the bonds of matrimony with the Respondent, and Complainant further prays for such other, further and different relief as in equity he may be due, and as in duty bound he will ever pray, etc.


SOLICITOR FOR COMPLAINANT.