

ANNIE MAE REGISTER
Complainant,
Vs.
LEXIE WAYNE REGISTER
Respondent.

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

ANSWER AND WAIVER

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

Respondent agrees that the testimony in this cause may be taken by deposition on oral examination, and waives notice of the time and place of the taking of such testimony and agrees that this cause may be submitted for final decree at any time. Respondent waives all notices to which he or she may be entitled by law in this cause. Respondent agrees that _____ may take the testimony in this cause as commissioner, without the issuance of a commission.

ATTEST:

- 1. Francis E. Mottis
- 2. _____

[Signature]
RESPONDENT

Complainant agrees that _____ may take the testimony in this cause as commissioner, without issuance of a commission.

William G. Brown
SOLICITOR FOR COMPLAINANT.

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

Respondent agrees that the Complainant shall be granted the custody and control of their two minor children subject to his right to see and visit with said children at all reasonable times. Respondent agrees to pay the Complainant the sum of \$100.00 a month as support and maintenance for said minor children. Respondent agrees to convey a life estate of his right and title in the house located at 423 Summerville Street to the Complainant. Complainant agrees to pay off the mortgage which now encumbers said property. Complainant releases the Respondent from all claims of alimony or support to herself.

[Signature]
Respondent

Annie Mae Register
Complainant

STATE OF ALABAMA
COUNTY OF MOBILE

Before me, the undersigned authority, in and for said State and County personally appeared the above named Respondent, whose name is signed to the foregoing instrument, and who was made known to me, acknowledged before me this day, that being informed of the contents of the instrument, said Respondent executed the same voluntarily on the day same bears date.

Witness my hand and seal this 12th day of August 1958.

Filed in Registers Office
_____ 195_____
W. ELSWORTH HAUGHTON, REGISTER 223

William G. Brown
NOTARY PUBLIC
(Please affix official seal)

ANNIE MAE REGISTER
Complainant,

-vs-

LEXIE WAYNE REGISTER,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY:

NO. _____

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

Comes the Complainant in the above styled cause and shows
unto Your Honors and unto this Honorable Court as follows:

ONE

Comes the Complainant and shows that she is the wife of
the Respondent. They were married to each other on July 25, 1946
in Leaksville, Mississippi. Both the Complainant and the Respondent
are each over the age of twenty-one years and both the
Complainant and the Respondent are bona-fide resident citizens
of Mobile County, State of Alabama and have been such for more
than one year next preceding the filing of the bill of complaint
herein. There are two minor children as issue of their marriage,
Patricia Ann Register, age ten years and Vickie Lee Register, age
eight years. Said children live and reside with the Complainant
and she is a fit and proper person to be granted their custody and
control, The Respondent is a fit and proper person to be granted
the right to see and visit with said children at all reasonable
and seasonable times.

TWO

The Respondent has committed actual violence upon the person
of the Complainant, attended with danger to her life or health,
or from his conduct there is reasonable apprehension of such
violence.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of this cause, will make the said Lexie Wayne Register, party-respondent hereto, and will cause him to appear, plead, answer or demur hereto within the time allowed by law and the rules of this Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant her an absolute divorce from the bonds of matrimony with the Respondent, and Complainant prays that she will be awarded the custody and control of their two minor children, subject to Respondent right to see and visit with said children at all reasonable times, and Complainant further prays for such other, further and different relief as in equity she may be due, and as in duty bound she WILL ever pray, etc.

Filed
Aug. 14, 1958
Alice J. Duck, Register

William H. Hargrove

SOLICITOR FOR COMPLAINANT.