

RAYMOND F. PARTRIDGE, who sues
by Wilson Hayes his guardian

Complainant

VS

MARGIE PARTRIDGE

Respondent

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: 4403

FINAL DECREE

This cause coming on to be heard was submitted upon Bill of Complaint, 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 Raymond F. Partridge is forever divorced from the said Margie Partridge for and on account of cruelty.

It is further ordered, adjudged and decreed that the said minor children Eunice Partridge age 13, Lois Partridge age 9, Shirley Partridge age 3 and Tony Partridge age 2, be placed in the custody of Complainant.

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, adjudged and decreed that a reasonable attorneys fee of \$ 125⁰⁰ be and the same is hereby allowed to be paid to Wilson Hayes as attorney for Complainant.

It is further ordered that Raymond F. Partridge, the Complainant pay the cost herein to be taxed, for which executed may issue.

This 17 day of Oct, 1958.

Hubert M. Hall
JUDGE CIRCUIT COURT, IN EQUITY

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: RUTH K. HOWELL

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 RAYMOND F. PARTRIDGE and MARGARET E. PARTRIDGE

a witness in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein RAYMOND F. PARTRIDGE

and

MARGIE PARTRIDGE

, Complainant

Respondent

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

Witness 16 day of Oct.

, 1958

Alice J. Luck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

RAYMOND F. PARTRIDGE, who sues
by Wilson Hayes his guardian

Complainant

VS.

MARGIE PARTRIDGE

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

Raymond F. Partridge, who sues
by Wilson Hayes his guardian

COMPLAINANT

vs.

Margie Partridge

RESPONDENT

I, RUTH K. HOWELL

as Register and Commissioner

have called and caused to come before me Margaret Partridge and Raymond F. Partridge

witnesses named in the requirement for Oral Examination, on the _____ day of

19 _____, at the office of

in Bay Minette, _____, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Margaret Partridge and Raymond F. Partridge

doth depose and say as follows:

My name is Margaret Partridge. I am the mother of Raymond F. Partridge, the Complainant in this case. I live a short distance from the Complainant and have for a number of years. The Complainant and Respondent were married in Baldwin County, Alabama on February 11, 1945 and that they lived together as husband and wife until October 6, 1958. There were four children born of this marriage Eunice Partridge age 13, Lois Partridge age 9, Shirley Partridge age 3 and Tony Partridge age 2. All during the marriage especially during the year of 1958 the Respondent threatened the Complainant, hitting with her hands and fists and threatened to do him serious bodily harm. Respondent is a strong and able bodied woman and Complainant suffers from a back injury and is unable to defend himself from the cruel treatment of the Respondent. The Complainant is kind to children and is a fit and proper person to have custody of them.

Margaret E. Partridge

My name is Raymond F. Partridge I am over the age of 21 years. I live in Baldwin County, Alabama. I was married to Margie Partridge on February 11, 1945, Baldwin County, Alabama and lived together as husband and wife until October 6, 1958. We had four children born of this marriage Eunice Partridge age 13, Lois Partridge age 9, Shirley Partridge age 3 and Tony Partridge age 2. On October 6, 1958 and many times prior to that, Respondent, Margie Partridge threatened to strike me and on that occasion his me on the face and body. I am afraid of her and believe that I will be hurt.

Raymond F. Partridge

ORAL EXAMINATION

I, RUTH K. HOWELL 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 *Raymond T. Portney & Margaret E. Calhoun* 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 16th day of *October*, 19*58*.

Ruth K. Howell (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

FILED

Record

Vol. _____ Page _____

OCT 16 1958

ALICE J. DUCK, CLERK
REGISTER, Register.

RAYMOND F. PARTRIDGE, who sues
 by Wilson Hayes his guardian
 Complainant
 vs.
 Margie Partridge
 Respondent

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,
 and testimony of Margaret E. Partridge and Raymond F. Partridge

and in behalf of Defendant upon answer and waiver.

Alice J. Duck
 Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

RAYMOND F. PARTRIDGE, who sues

by Wilson Hayes his guardian

COMPLAINANT

VS.

MARGIE PARTRIDGE

RESPONDENT

Note of Testimony

Filed in Open Court this

day of **FILED**, 19.....

OCT 16 1958

Register.

ALICE J. DUCK CLERK
MOORE PRINTING CO. BY MOORE REGISTER

RAYMOND F. PARTRIDGE, who
sues by Wilson Hayes his
guardian

Complainant

VS

MARGIE PARTRIDGE

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: _____

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

Comes now your Complainant, Raymond F. Partridge, and represents and
shows unto Your Honor as follows:

I

That your Complainant is over the age of 21 years and is a bona fide
resident of Baldwin County, Alabama, and that Respondent is over 21 years of
age and is a bona fide resident of Baldwin County, Alabama.

II

That Complainant and Respondent were married in Baldwin County, Alabama
on February 11, 1945 and that they lived together as husband and wife until
to-wit: October 6, 1958 and that they have not lived together as husband
and wife since that date. There are four children born of this marriage, Eunice
Partridge age 13, Lois Partridge age 9, Shirley Partridge age 3 and Tony
Partridge age 2, and that Respondent is not a fit and proper person to have
custody of the said children.

III

That on to-wit: October 6, 1958 and many times prior thereto, and since
said marriage, the said Respondent committed actual violence to his person
attended with danger to his life or health and that from her conduct and threats
toward him at said time there was and is grave danger that she would commit
further violence.

Now therefore, the premises considered, Complainant prays that this
Honorable Court will cause process to issue to the said Respondent, Margie
Partridge requiring her to plead, answer or demur to same within the time allowed
by law.

That it has been necessary to have the services of a solicitor to
prosecute this, Complainant's cause, that Wilson Hayes, an attorney, has so
served, and that he has and does, perform substantial services for Complainant
for which he is entitled to a reasonable fee.

And Complainant further prays that upon final hearing of this cause your Honor will grant to him an absolute divorce forever barring the bonds of matrimony existing between Complainant and Respondent, allowing a reasonable solicitor's fee, and that your Honor will grant such other, further, different or general relief to which Complainant may be in equity and good conscience entitled.

W. L. Hayden
Solicitor for Complainant.

RAYMOND F. PARTRIDGE, who
sues by Wilson Hayes his
guardian

Complainant

VS

~~MARGIE~~ PARTRIDGE

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: _____

.....

Comes now Respondent in the above styled cause and accept services a copy of the Complainant's bill of complaint and waives further notice and waives all further notices of taking of testimony and submission, and for answer to the bill and each paragraph thereof, says:

1. Respondent admits to the allegations containing in paragraph I.
2. Respondent admits to the allegations to paragraph II.
3. Respondent denies the allegations containing in paragraph 3 and demands strict proof thereof.

Margie Partridge
Margie Partridge

Sworn to and subscribed before me this the 10th day of

October, 1958.

Wilson Hayes
Wilson Hayes, Notary Public, State at Large