

(4425)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MAMIE SANDLIN RAYBON

Complainant

vs.

M. E. RAYBON

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and Confession~~ Waiver and Answer 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 MAMIE SANDLIN RAYBON is forever divorced from the said M. E. RAYBON for and on account of

"CRUELTY"

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 MAMIE SANDLIN RAYBON the Complainant pay the cost herein to be taxed, for which executed may issue.

This 1 day of November 1958

Hubert M. Moore

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. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

NOV 8

ALICE J. DUCK

CLERK

REGISTER

MAMIE SANDLIN RAYBON

vs.

M. E. RAYBON

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, Waiver and Answer, and testimony of Mamie Sandlin Raybon.

and in behalf of Defendant upon Waiver and Answer

Telfair J. Madaleno

Alvin J. Black
Register.

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

VS.

Note of Testimony

Filed in Open Court this _____

day of _____, 19____

Register.

FILED
OCT 31 1932
ALICE J. DICK, CLERK
REGISTER

MAMIE SANDLIN RAYBON
Complainant,
VS.
M. E. RAYBON
Respondent.

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

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from

Bay Minette, in the County of Baldwin

Alabama, the place of trial of said cause, to-wit: MAMIE SANDLIN RAYBON

2. That said complainant requires an oral examination of said witnesses before a commissioner appointed by the Register of this Court.

Jefair J. Madiburn
Solicitor for Complainant.

NOTE:

Complainant suggests the name of ALICE COX

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Jefair J. Madiburn
Solicitor for Complainant.

DEMAND FOR ORAL EXAMINATION.

MAMIE SANDLIN RAYBON

Complainant,

Vs.

M. E. RAYBON

Respondent.

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

Filed this day of,

194.....

FILED

OCT 31 1950

Register.

ALICE J. DUCK, CLERK
REGISTER

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: ALICE COX

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

a witness in behalf of MAMIE SANDLIN RAYBON in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

MAMIE SANDLIN RAYBON

and is the , Complainant

M. E. RAYBON

is the Respondent

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

Witness day of

, 195 8

Alice Cox
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

VS. Complainant

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

THE STATE OF ALABAMA,

BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

MAMIE SANDLIN RAYBON COMPLAINANT

vs.

M. E. RAYBON RESPONDENT

I, ALICE COX

as ~~Register and~~ Commissioner

have called and caused to come before me MAMIE SANDLIN RAYBON

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

19____, at the office of Telfair J. Mashburn

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

truth, the whole truth, and nothing but the truth, the said MAMIE SANDLIN RAYBON

doth depose and say as follows: "My name is Mamie Sandlin Raybon. I am over the age of twenty-one years, and I live in Bay Minette, Alabama, where I have lived for more than the last past two years. M. E. Raybon, the respondent, is over the age of twenty-one years, and is a resident of Baldwin County, Alabama. I was married to the respondent in Jackson County, Mississippi, on the 21st day of March, 1956. We lived together in Bay Minette, Alabama, until the 27th day of September, 1958. We lived in my home and my husband nagged at me until he finally got me to put a mortgage on my home, which was free and clear of debt at the time of our marriage. Shortly before the 27th day of September, 1958, he began to nag at me to borrow more money on my home, when I refused, he became furious. He began to threaten me with physical violence, and finally his threats and abuse became so violent that I became convinced that, if I continued to live with him as his wife, he would commit actual physical violence on my person which would necessarily endanger my life or health. Because of my fear of him, I left him at that time, and have not lived with him since. I am sure that we shall never again be able to live together as husband and wife." Further deponent says not.

Telfair Mashburn

Mamie Sandlin Raybon

I, ALICE COX 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 _____ and read over to her and she signed the same in the presence of myself and Telfair J. Mashburn _____ at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proof made before me of the identity of said witness _____; 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 31st day of October, 1958

Alice Cox (L. S.)

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|--|----------------|
| No. _____ | Page _____ |
| THE STATE OF ALABAMA, BALDWIN COUNTY | |
| IN CIRCUIT COURT, IN EQUITY | |
| COMPLAINANT | RESPONDENT |
| vs. | |
| ORAL DEPOSITION | |
| Filed _____ 19__ | |
| FILED | |
| OCT 31 1958 | |
| RECORDED BY _____ | |
| T. J. MASHBURN, REGISTER | |
| Vol. _____ | Page _____ |
| Record _____ | Register _____ |

MAMIE SANDLIN RAYBON,
Complainant,
VS.
M. E. RAYBON,
Respondent.

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

Comes the respondent in the above styled cause and accepts service of a copy of the bill of complaint in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. He admits the allegations contained in paragraph 1 of said bill of complaint.
2. He admits the allegations contained in paragraph 2 of said bill of complaint.
3. He denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof thereof.

Alvie Cox

M E Raybon
Respondent.

MAMIE SANDLIN RAYBON,
Complainant,
VS.
M. E. RAYBON,
Respondent.

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

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

Your complainant, MAMIE SANDLIN RAYBON, respectfully represents and shows unto your Honor:

1. That complainant is over the age of twenty-one years and is a resident of said State and County; that M. E. RAYBON is over the age of twenty-one years and a resident of said State and County;
2. That your complainant and the respondent were lawfully married in Jackson County, Mississippi, on, to-wit: March 21, 1956.
3. That, on, to-wit: the 27th day of September, 1958, and many times prior thereto the respondent did curse, threaten and abuse your complainant; that, on the aforesaid date, the complainants threats became so violent that your complainant became reasonably convinced that, should she continue to live with the respondent as his wife, he would carry out his threats and commit actual physical violence on her person which would necessarily endanger her life or health.

THE PREMISES CONSIDERED, your complainant makes the said M. E. RAYBON A party respondent to this her bill of complaint, and in order that complainant may have the relief hereinafter prayed for, may it please your Honor to cause the States writ of subpoena to be issued, directed to the said M. E. RAYBON, commanding him to plead, answer or demur to this bill of complaint within the time required by law; your complainant further prays that, on a final hearing of this cause, your Honor will make and enter a decree forever divorcing her from the said M. E. RAYBON; and that your Honor will grant such other, further, different or general relief as unto your Honor May seem just and proper, and, as in duty bound, your complainant will ever pray, etc.

J. J. Madaleno