

4431

DIVORCE DECREE

MOORE PRINTING COMPANY - EAY MINETTE, ALA

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARGARET HELEN PERRYMAN, Complainant

vs.

DONALD BRUCE PERRYMAN, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso 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 Margaret Helen Perryman is forever divorced from the said Donald Bruce Perryman for and on account of Cruelty. The stipulated agreement entered into between the parties and attached hereto the Bill of Complaint is hereby confirmed and, It is ordered, adjudged and decreed that Respondent pay to the Complainant the sum of \$200.00 per month, as and for alimony, for a period of four months, the first installment to be due and payable on or before December 15, 1958.

It is futher 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 futher ordered that Margaret Helen Perryman the Complainant pay the cost herein to be taxed, for which executed may issue.

This 12. day of November 1958

Robert M. Hall

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

MARGARET HELEN PERRYMAN

Complainant

vs.

DONALD BRUCE PERRYMAN

Respondent

DIVORCE DECREE

STATE OF ALABAMA  
BALDWIN COUNTY

Q  
Q

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Donald Bruce Perryman to appear and answer, plead or demur, to the Bill of Complaint filed in this court within thirty days from the service hereof, by Margaret Helen Perryman, as Complainant, against Donald Bruce Perryman, as Respondent.

Witness my hand this the 6 day of November, 1958.

*Alice J. Duck*  
REGISTER

MARGARET HELEN PERRYMAN, Q

Complainant

versus Q

DONALD BRUCE PERRYMAN, Q

Respondent Q

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Comes your Complainant, Margaret Helen Perryman, and files this her Bill of Complaint for divorce against Donald Bruce Perryman and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are both over the ages of twenty-one years and are resident of Baldwin County, Alabama.

SECOND:

That the Complainant and the Respondent were married on, heretofore, to-wit, the 14th day of October, 1951 in La Mesa, California and lived together as husband and wife until on, to-wit, September 22nd, 1958, when, on account of the matters hereinafter complained of, your Complainant was forced to live separate and apart from the Respondent; that on the 22nd day of September, 1958 and at times prior thereto, the Complainant states that the Respondent, from his manner and conduct toward her, gave reasonable apprehension of committing violence upon her person, attended with danger to her

life and health, and that from his manner and conduct toward her, she is reasonably certain that if she continues to live with him as his wife, the Respondent will commit such actual violence upon her person, attended with danger to her life and health.

THIRD:

That no children have been born of this marriage between the Complainant and the Respondent and that the parties hereto have heretofore reached an agreement between themselves as to the disposition of their property and alimony to be paid to the Complainant and which stipulated agreement is attached hereto and made a part of this Bill of Complaint.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, the Complainant prays that the above named Donald Bruce Perryman be made a party defendant to this cause by the usual writ or process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided. That upon the final hearing of this cause, Your Honor will grant unto the Complainant an absolute divorce from the Respondent and will decree that the parties be allowed to remarry if they see fit. Complainant prays that Your Honor will grant that she resume her maiden name if she desires. Your Complainant further prays that she be granted such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

*Margaret Helen Perryman*  
MARGARET HELEN PERRYMAN

STATE OF ALABAMA        )  
BALDWIN COUNTY         )

Before me, the undersigned authority, personally appeared Margaret Helen Perryman, who, after being first duly sworn, deposes and says that the allegations contained in the foregoing Bill of Complaint are true and correct.

*Margaret Helen Perryman*  
MARGARET HELEN PERRYMAN

Sworn and subscribed to before me this 8th day of November, 1958.

*James W. Bailey*  
Notary Public

MARGARET HELEN PERRYMAN,

Complainant

vs.

DONALD BRUCE PERRYMAN,

Respondent

SUMMONS AND BILL OF COMPLAINT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

MARGARET HELEN PERRYMAN,  
Complainant

versus

DONALD BRUCE PERRYMAN,  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

STIPULATED AGREEMENT

It is hereby stipulated and agreed between the parties hereto as follows:

1. That the Respondent shall pay to the Complainant the sum of Two Hundred (\$200.00) Dollars per month, as and for alimony, for a period of four months. The first of which payments shall be due and payable on or about December 15, 1958.

2. The Complainant and the Respondent shall make distribution of their personal property as they have heretofore agreed between themselves.

It is further agreed between the parties that this agreement may be used as a part of the proceedings for divorce by either party and may be confirmed and ratified by any Court having jurisdiction thereof.

IN WITNESS WHEREOF, the parties to this agreement have hereunto set their hands and seals on this the 8 day of November, 1958.

*Margaret Helen Perryman* (SEAL)  
MARGARET HELEN PERRYMAN

WITNESS FOR THE COMPLAINANT:

*[Signature]*

*Donald Bruce Perryman* (SEAL)  
DONALD BRUCE PERRYMAN

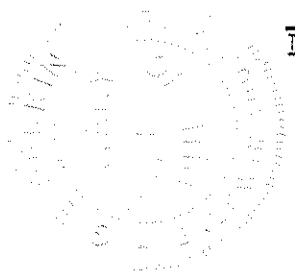
STATE OF ALABAMA )  
COUNTY OF )

I, the undersigned notary public in and for said state and county, certify that Donald Bruce Perryman, 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 the instrument, he executed the same voluntarily on day same bears date.

Given under my hand and seal this 8 day of November, 1958.

My commission expires 7/13/59

*A. E. Perkins*  
NOTARY PUBLIC



4431

MARGARET HELEN PERRYMAN,

Complainant

vs.

DONALD BRUCE PERRYMAN,

Respondent

STIPULATED AGREEMENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED

NOV 6 1955

ALICE J. DUCK, CLERK  
REGISTER



STATE OF ALABAMA  
BALDWIN COUNTY

§  
§

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

MARGARET HELEN PERRYMAN

Complainant

versus

DONALD BRUCE PERRYMAN,

Respondent

ANSWER AND WAIVER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and for each and every paragraph thereof separately and severally says:

1. Respondent admits the allegations of the first paragraph of the Bill of Complaint.
2. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations contained in this paragraph and demands strict proof of the same.
3. Respondent admits the allegations of the third paragraph of the Bill of Complaint.

Respondent hereby accepts service of a copy of the Summons and Complaint in this cause and waives further service of the same. Respondent also waives notice of taking of testimony in this cause and notice of submission and agrees that the testimony may be taken and the cause submitted without further notice to him.

*Donald Bruce Perryman*  
DONALD BRUCE PERRYMAN

STATE OF ALABAMA )  
COUNTY OF )

I, the undersigned notary public in and for said state and county certify that Donald Bruce Perryman, 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 the instrument, he executed the same voluntarily on the day same bears date. Given under my hand and seal this 2 day of November, 1958. My commission expires 3/15/59

*G. L. Parkman*  
NOTARY PUBLIC



MARGARET HELEN PERRYMAN,

Complainant

VS.

DONALD BRUCE PERRYMAN,

Respondent

ANSWER AND WAIVER

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED

NOV 2 1958

ALICE J. DUCK, CLERK  
REGISTER



MARGARET HELEN PERRYMAN

vs.

DONALD BRUCE PERRYMAN

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 Complainant and Mrs. Bessie Bales

and in behalf of Defendant upon Answer and Waiver

*Ernest M. Bailey*  
SOLICITOR FOR COMPLAINANT

*Alice J. Duck*  
Register.

No. \_\_\_\_\_

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**THE STATE OF ALABAMA**  
**Baldwin County**

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**IN EQUITY**  
Circuit Court of Baldwin County

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MARGARET HELEN PERRYMAN

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VS.

DONALD BRUCE PERRYMAN

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**Note of Testimony**

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Filed in Open Court this \_\_\_\_\_

**FILED**

day of \_\_\_\_\_, 19\_\_\_\_

NOV 12 1958

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**ALICE J. DUCK**, CLERK Register.  
REGISTER

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MOORE PRINTING CO., BAY MINETTE, ALA.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Helen Bailey

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 Margaret Helen Perryman and Bessie Bales

a witness in behalf of Complainant  
Circuit Court in Baldwin County, of said State, wherein

in a cause pending in our  
Margaret Helen Perryman

and Donald Bruce Perryman

, Complainant

Respondent

on oath, to be by you administered, upon Margaret Helen Perryman and Bessie Bales to take and certify the deposition <sup>s</sup> of the witness<sup>es</sup> and return the same to our Court, with all convenient speed, under your hand.

Witness 6<sup>th</sup> day of November

1958

Alice J. Luck  
Register.

Commissioner's Fee, \$

Witness' Fees, \$



THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

MARGARET HELEN PERRYMAN,

COMPLAINANT

vs.

DONALD BRUCE PERRYMAN,

RESPONDENT

I, Helen Bailey

as Register and Commissioner

have called and caused to come before me Margaret Helen Perryman and Bessie Bales

witness named in the requirement for Oral Examination, on the 8th day of November,  
19 58 , at the office of Ernest M. Bailey,

in Fairhope , Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Margaret Helen Perryman

and Bessie Bales doth depose and say as follows:

TESTIMONY OF MARGARET HELEN PERRYMAN:

My name is Margaret Helen Perryman and I am the Complainant in the above styled cause. The Respondent's name is Donald Bruce Perryman and we are both over the ages of twenty-one years and residents of Baldwin County, Alabama. We were married on October 14, 1951 in La Mesa, California and lived together as husband and wife until on, to-wit, September 22, 1958. On that date and on prior occasions, the Respondent abused and threatened to commit violence upon my person. I am of the opinion that if I continue to live with him as his wife, the Respondent will commit actual violence upon my person or may injure me permanently.

*Margaret Helen Perryman*  
MARGARET HELEN PERRYMAN

TESTIMONY OF BESSIE BALES:

My name is Bessie Bales. I am over the age of twenty-one years and am a resident of Fairhope, Baldwin County, Alabama. I have known the Complainant and Respondent during their married life. I have seen the Complainant on several occasions when she was emotionally disturbed by reasons of domestic difficulties with her husband.

*Bessie Bales*  
BESSIE BALES

ORAL EXAMINATION

I, Helen Bailey 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 Ernest M. Bailey, Attorney at Law, 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 8th day of November, 19 58 .

Helen Bailey (L. S.)

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No. \_\_\_\_\_ Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

MARGARET HELEN PERRYMAN

COMPLAINANT

vs.

DONALD BRUCE PERRYMAN

RESPONDENT

ORAL DEPOSITION

FILED

Filed NOV 12 1958, 19

ALICE J. DUCK, CLERK  
RECORDED IN REGISTER

, Register.

Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.