

(4550)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

JOSEPH ANDREW BOYD, Complainant

vs.

BETTY JEAN BOYD, Respondent

This cause coming on to be heard was submitted upon Amended Bill of Complaint, ~~Decree Pro Confession~~ 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 JOSEPH ANDREW BOYD is forever divorced from the said BETTY JEAN BOYD for and on account of Abandonment.

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 Joseph Andrew Boyd the Complainant pay the cost herein to be taxed, for which executed may issue.

This 15 day of December 1959

[Signature] 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.

112

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

Filed 12-15-59

Alice J. Duck
Printer

JOSEPH ANDREW BOYD

vs.


BETTY JEAN BOYD

THE STATE OF ALABAMA
Baldwin County

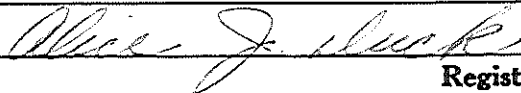
IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, Amended Bill of Complaint, Service of Amended Complaint by Registered Mail, and Testimony of Joseph Andrew Boyd and Addie A. Taylor

and in behalf of Defendant upon Answer and Waiver to original Bill of Complaint and Answer and Waiver to Amended Bill of Complaint



Solicitor for complainant



Register.

M

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

JOSEPH ANDREW BOYD

VS.

BETTY JEAN BOYD

Note of Testimony

Filed in Open Court this _____

day of _____, 19____

Register.

CECIL G. CHASON

ATTORNEY AT LAW

FOLEY, ALABAMA

April 18, 1959

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint and Answer and
Waiver in the divorce action of Boyd -vs- Boyd.

Yours very truly,



C. G. Chason

CGC:fm

encls. 2

CECIL G. CHASON

ATTORNEY-AT-LAW

FOLEY, ALABAMA

November 24, 1959

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Amended Bill of Complaint in the
~~Divorce action of Boyd -vs- Boyd.~~

This is to be served by Registered mail.

Yours very truly,



C. G. Chason

CGC:fm

encls. as noted.

JOSEPH ANDREW BOYD,)	
)	
Complainant,)	IN THE CIRCUIT COURT OF
-vs-)	BALDWIN COUNTY, ALABAMA
BETTY JEAN BOYD,)	
)	IN EQUITY
Respondent.)	

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

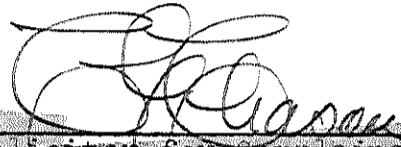
Comes your Complainant, Joseph Andrew Boyd, and files this his Bill of Complaint for Divorce against Betty Jean Boyd, and respectfully shows unto your Honor:-

1. That your Complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, having been such a resident citizen for more than one year next preceeding the filing of this Bill of Complaint; that Betty Jean Boyd is over the age of twenty-one years and is presently residing at 1880 Southwest 74th Avenue, Miami, Florida.
2. That the Complainant and Respondent were lawfully married on, to-wit, January 19, 1958.
3. Your Complainant further avers and alleges that the Respondent has been guilty of adultery with divers parties or persons whose names are presently unknown to your Complainant, and that there has been no condonation by your Complainant.
4. Complainant further shows unto this Court that there were no children born of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Betty Jean Boyd be made a party defendant to this cause by the usual process of this Honorable Court, requiring her to 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. The Complainant further prays that upon a final hearing of this cause that he be granted a divorce from the said Respondent. Should your Complainant be mistaken in the relief

prayed for that he be granted such other, further, different and general relief to which he may be entitled and as in duty bound he will ever pray.



Solicitor for Complainant

JOSEPH ANDREW BOYD,
Complainant,
-vs-
BETTY JEAN BOYD,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

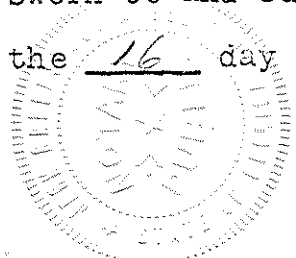
Comes the Respondent in the above styled cause and accepts service of a Bill of Complaint heretofore filed in said cause; waives notice of the tiling of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

1. She admits the allegations contained in Paragraph 1 of the Bill of Complaint.
2. She admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. She denies each and every allegation contained in Paragraph 3 of said Bill of Complaint, and demands strict
4. She admits the allegations contained in Paragraph 4 of said Bill of Complaint.

Betty Jean Boyd
Respondent

Sworn to and subscribed before me, a Notary Public, on this the 16 day of April, 1959.



199

Jack Greenup
Notary Public, County of Dade
State of Florida

Notary Public, State of Florida at large.
My Commission expires Sept 14, 1962.

(affix Seal)

JOSEPH ANDREW BOYD,)	
)	
Complainant,)	IN THE CIRCUIT COURT OF
)	
-vs-)	BALDWIN COUNTY, ALABAMA
)	
BETTY JEAN BOYD,)	IN EQUITY
)	
Respondent.)	

AMENDED BILL OF COMPLAINT

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, Sitting in Equity:-

Comes your Complainant, Joseph Andrew Boyd, and files this his Amended Bill of Complaint for Divorce against Betty Jean Boyd, and respectfully shows unto your Honor:-

1. That your Complainant is over the age of twenty-one years, and is a bona fide resident citizen of Baldwin County, Alabama, having been such a resident citizen for more than one year next preceeding the filing of this Bill of Complaint; that Betty Jean Boyd is over the age of twenty-one years and is not a resident of the State of Alabama, her present address being 1711 Ten. Eyck Street, Jackson, Michigan.

2. That the Complainant and Respondent were lawfully married on, to-wit, January 19, 1958.

3. Your Complainant further avers and alleges that the Respondent has been guilty of adultery with divers parties or persons whose names are presently unknown to your Complainant, and that there has been no condonation by your Complainant.

4. Complainant further avers that said Respondent voluntarily and with no cause abandoned the bed and board of your Complainant, more than one year next preceeding the filing of this Bill of Complaint, since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.


5. Complainant further shows unto this Court that there were no children born of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that Betty Jean Boyd be made a party defendant to this cause by the usual process of this Honorable Court, by service by Registered Mail,

requiring her to 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. The Complainant further prays that upon a final hearing of this cause that he be granted a divorce from the said Respondent. Should your Complainant be mistaken in the relief prayed for that he be granted such other, further, different and general relief to which he may be entitled and as in duty bound he will ever pray.

FILED
NOV 25 1959
ALICE J. DUCK, Register


Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.



Circuit Court, Baldwin County

No. 4550

----- TERM, 19-----

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon BETTY JEAN BOYD

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

BETTY JEAN BOYD, Defendant

by JOSEPH ANDREW BOYD

-----, Plaintiff

Witness my hand this 25 day of November 19 59

Alice J. Lucke, Clerk

No. 4550 Page _____

The State of Alabama
Baldwin County

CIRCUIT COURT

JOSEPH ANDREW BOYD

Plaintiffs

vs.

BETTY JEAN BOYD

Defendants

Summons and Complaint

Filed November 25, 1959

Alice J. Duck Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with

_____, Sheriff

_____, Deputy Sheriff

JOSEPH ANDREW BOYD,)	
)	
Complainant,)	IN THE CIRCUIT COURT OF
)	
-vs-)	BALDWIN COUNTY, ALABAMA
)	
BETTY JEAN BOYD,)	IN EQUITY
)	
Respondent.)	

Comes the Respondent in the above styled cause and accepts service of an Amended Bill of Complaint heretofore filed 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 Amended Bill of Complaint heretofore filed in this cause, Respondent says:

1. She admits the allegations contained in Paragraph 1 of the Bill of Complaint.
2. She admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. She denies each and every allegation contained in Paragraph 3 of said Amended Bill of Complaint, and demands strict proof thereof.
4. She denies each and every allegation contained in Paragraph 4 of said Amended Bill of Complaint, and demands strict proof thereof.
5. She admits the allegations contained in Paragraph 4 of said Amended Bill of Complaint.

Betty Boyd

Sworn to and subscribed before me, a Notary Public,
on this the 30 day of November, 1959.



(affix Seal)

Dorothy M. Andrews
Notary Public, County of Jackson
State of Michigan

DOROTHY M. ANDREWS
Notary Public, Jackson County, Mich.
My Commission Expires June 4, 1963.

FILED

DEC 15 1959

ALICE J. DUCK, Registrar

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

JOSEPH ANDREW BOYD

COMPLAINANT

vs.

BETTY JEAN BOYD

RESPONDENT

I, Frances G. Mallory

as Register and Commissioner in Chancery

have called and caused to come before me Joseph Andrew Boyd and Addie A. Taylor

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

19 59 , at the office of C. G. Chason

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

truth, the whole truth, and nothing but the truth, the said Joseph Andrew Boyd and Addie

A. Taylor doth depose and say as follows:

TESTIMONY OF JOSEPH ANDREW BOYD:

My name is Joseph Andrew Boyd. I am over the age of twenty-one years, and a resident citizen of Baldwin County, Alabama, having been such a resident citizen for more than five years. Betty Jean Boyd is over the age of twenty-one years, and is not a resident of the State of Alabama, presently residing in Jackson, Michigan. We were married on January 19, 1958, Betty Jean Boyd abandoned me in Baldwin County, Alabama, in November of 1958, and went to Miami, Florida. This abandonment was voluntary and with no cause. We have not lived together as husband and wife since that time. I made a trip to Miami and learned that she was living in adultery with a man in Miami, and that this situation continued for many months. We have not lived together as husband and wife, nor have we recognized each other as husband and wife since the date of her abandonment. There are no children of this marriage.

Signed: Joseph Andrew Boyd

TESTIMONY OF ADDIE A. TAYLOR:

My name is Addie A. Taylor. I am over the age of twenty-one years and a resident of Baldwin County, Alabama. I am personally acquainted with Joseph Andrew Boyd and Betty Jean Boyd. They were married on January 19, 1958, and lived together as husband and wife until November of 1958, at which time she voluntarily and with no cause abandoned Joseph Andrew Boyd, and they have not lived together nor recognized each other as husband and wife since that time. They are both over the age of twenty-one years and he is a resident citizen of Baldwin County, Alabama. Betty Jean Boyd is not a resident citizen of the State of Alabama, and I believe she is now living in Jackson, Michigan. They were residing in Baldwin County, Alabama at the time she abandoned Joseph Andrew Boyd. There were no children of this marriage.

Signed: Addie A Taylor

ORAL EXAMINATION

I, Frances G. Mallory 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 tney signed the same in the presence of myself and C. G. Chason 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 15. day of December, 1959

Frances G. Mallory

No. _____ Page _____

**THE STATE OF ALABAMA
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

JOSEPH ANDREW BOYD

COMPLAINANT

vs.

BETTY JEAN BOYD

RESPONDENT

ORAL DEPOSITION

FILED

Filed DEC 15 1959, 19

Alice J. Duck, Register, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County



Circuit Court

TO: FRANCES G. MALLORY

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 Joseph Andrew Boyd and Addie A. Taylor

a witness in behalf of Joseph Andrew Boyd
Circuit Court in Baldwin County, of said State, wherein

in a cause pending in our

JOSEPH ANDREW BOYD

, Complainant

and

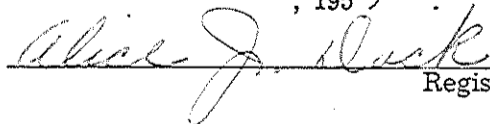
BETTY JEAN BOYD

Respondent

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

Witness 15th day of December

, 1959


Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JOSEPH ANDREW BOYD

Complainant

VS.

BETTY JEAN BOYD

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

FILED
WITNESSES:

DEC 15 1959

ALICE J. DUCK, Register

11551