(4511)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County Case #4571

CIRCUIT COURT, IN EQUITY

TRACY WILLIAMS, Complainant

vs.

MARY KOONCE WILLIAMS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Publication 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 TRACY WILLIAMS is forever divorced from the said MARY KOONCE WILLIAMS for and on account of ABANDONMENT

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 Tracy Williams the Complainant pay the cost herein to be taxed, for which executed may issue.

This 14th day of July 1959

Hubert 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.

LITHO IN U.S.A.

No._____ Page_____

THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

TRACY WILLIAMS

Complainant

vs.

MARY KOONCE WILLIAMS

Respondent

DIVORCE DECREE

Decree Pro Confesso of Publication.

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

No._____ _____Term, 19____

TRACY WILLIAMS Complainant

MARY KOONCE WILLIAMS Defendant

In this cause it appears to the Register _____ that the order of publication heretofore made in this cause, was published for four consecutive weeks, commencing on the 14th day of May, 1959, in the Fairhope Courier a newspaper published in Fairhope, Baldwin Co. Alabama, that a copy of said order was posted at the Court House door in Baldwin County, on the _____ day of _____ 19____, and

And it now further appearing to the Register _____, that the said

having, to the date hereof, failed to demur, plead to, or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant____, ordered and decreed by the Register _____ that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said Mary Koonce Williams

This 14 day of July 1959

150 Alice J. Mack Register.

No._____ Page_____

The State of Alabama
BALDWIN COUNTY

Circuit Court, In Equity

TRACY WILLIAMS

Vs.

MARY KOONCE WILLIAMS

Decree Pro Confesso of Publication

FILED
JUL 14 1959
ALICE J. DUCK, Register

Issued _____ 19____

_____ Register.

Recorded in _____ Record

Vol._____ Page_____

_____ Register.

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

8601. Motion for Decree Pro Confesso on Publication. MPCO

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

No. _____ _____, Term, 19____

TRACY WILLIAMS _____ Complainant

Vs.

MARY KOONCE WILLIAMS _____ Defendant

Motion is hereby made for a Decree Pro Confesso against Mary Koonce Williams

_____ Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This _____ day of _____ 19____

_____ Solicitor.

746 Code

No. _____ Page _____

The State of Alabama,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

TRACY WILLIAMS

Complainant

Vs.

MARY KOONCE WILLIAMS

Defendant

Motion for Decree Pro Confesso on Publication

FILED

Filed JUL 14 1959 19

ALICE J. DUCK, Register Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

Moore Printing Co., Bay Minette, Ala.

AFFIDAVIT

STATE OF ALABAMA
BALDWIN COUNTY

Before me, the undersigned authority, in and for said County, in said State, personally appeared Tracy William, and who being by me first duly and legally sworn on oath, doth depose and say:

That he is the Complainant in a suit for a divorce filed in the Circuit Court of Baldwin County, Alabama, in Equity, and that after due diligent search and inquiry, that the address and place of residence of the Respondent Mary Koonce Williams, is unknown to the said Affiant.

Tracy Williams

Subscribed and sworn to before me on this the 8th day of May, 1959.

Notary Public, Baldwin County, Alabama

TRACY WILLIAMS Complainant -VS- MARY KOONCE WILLIAMS Respondent	))))))))))	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

BILL OF COMPLAINT

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

Comes now your Complainant, Tracy Williams, and files this Bill of Complaint for divorce and respectfully shows unto your Honor and this Honorable Court as follows:

I

That your Complainant is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, and has been for more than two years next preceeding the filing of this Bill; that the Respondent, Mary Koonce Williams, is a non-resident of the State of Alabama, and her address being unknown to your Complainant, and is over the age of twenty-one years.

II

That your Complainant and the Respondent were married on to-wit the 20th day of May, 1933, at Bennetsville, South Carolina, and lived together as husband and wife until on to-wit; the 27th day of February, 1954.

III

That on to wit, the 27th day of February, 1954, the Respondent voluntarily abandoned the bed and board of your Complainant, for more than one year next preceeding the filing of this bill of complaint, since which time the Complainant and the Respondent have not lived together nor in any way recognized each other as husband and wife.

WHEREFORE, the premises considered, your Complainant makes the said Mary Koonce Williams, a party respondent to this bill of complaint, and in order that the Complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subponea to issue, directly to the said Respondent, com-

manding her to answer, plead or demur to this bill of complaint within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree forever divorcing your Complainant from the said Respondent, and granting the Complainant the right to remarry.

Your Complainant prays for such other, further and different relief as may seem just and proper, and your Complainant will ever pray.

Tracy Williams
Complainant

Solicitor for Complainant

STATE OF ALABAMA
BALDWIN COUNTY

Before me, _____, a Notary Public, in and for said County in said State, personally appeared Tracy Williams, known to me and who by me first being duly sworn on oath, doth depose and say:

That he is the Complainant in the above styled cause and that the names, ages and residents of the parties as stated are true and correct.

Tracy Williams

Subscribed and sworn to before me on this the 8th day of May, 1959.

Notary Public, Baldwin Co. Ala.

Filed May 12, 1959
Alice J. Buck, Register

4577

TRACY WILLIAMS
Complainant

-VS-

MARY KOONCE WILLIAMS
Respondent

- - - - - - - - - - - - - - - -

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

- - - - - - - - - - - - - - - -

BILL OF COMPLAINT

FILED

MAY

ALICE J. DUCK, CLERK
REGISTER

386 Fairhope Ave. WA 8-8960

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.

May 11th, 1959

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Ala.

Dear Mrs. Alice:

Please file and run notice in the Fairhope Courier.

Sincerely,

John

JVD:oq

NOTICE TO NON-RESIDENT

The Baldwin Times, Bay Minette, Alabama

TRACY WILLIAMS

No. 4571

vs.

MARY KOONCE WILLIAMS

The State of Alabama,

BALDWIN County.

Circuit Court, in Equity

This the 12th day of May, 1959

In this cause it being made to appear to the Clerk of this Court by the affidavit of Tracy Williams

that the Defendant Mary Koonce Williams

is a non-resident of the State of Alabama ~~and after diligent search and inquiry, the address and p~~ ~~and place of res idence cannot be ascertained~~

and further, that, in the belief of said Affiant the Defendant is over the age of 21 years; it is, therefore, ordered that publication be made in the ~~Baldwin Times~~ Fairhope Courier, a newspaper published in ~~Bay Minette~~ Fairhope, Baldwin County, Alabama, once a week for four consecutive weeks, requiring ~~Mary Koonce Williams~~ the said Respondent

to answer or demur to the Bill of Complaint in this cause by the 12th day of June 1959, or after thirty days therefrom a decree Pro Confesso may be taken against her

Register.

John V. Duck,
Solicitor For Complainant

386 Fairhope Ave. WA 8-8960

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.

July 19th, 1959

Mrs. Alice J. Duck
Clerk of Circuit Court
Bay Minette, Alabama

Dear Miss Alice:

Enlosed is the Divorce proceedings of Williams -vs- Williams. Also check for Court cost.

Please fill in the necessary dates and submit for final decree.

Sincerely,

John V. Duck

JVD:oq
Encl:
Papers
check

The Fairhope Courier

JOB PRINTING

ESTABLISHED 1894 | E. B. GASTON ESTATE, PUBLISHERS | TELEPHONE WA-[redacted] 8-9188

FAIRHOPE, ALABAMA

"On Mobile Bay"

This is to certify that the attached legal notice appeared in The Fairhope Courier, a weekly newspaper published in the City of Fairhope, County of Baldwin, State of Alabama on the dates of May 14 - 21 - 28 - June 4, 1959.

Frances G. Crawford
Editor

State of Alabama
County of Baldwin

Sworn to and subscribed this 8th day of June A. D. 1959, before me.

[illegible]
Notary Public, Baldwin County

NOTARY PUBLIC STATE OF ALABAMA AT LARGE

TRACY WILLIAMS Complainant -VS- MARY KOONCE WILLIAMS Respondent	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

BILL OF COMPLAINT

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

Comes now your Complainant, Tracy Williams, and files this Bill of Complaint for divorce and respectfully shows unto your Honor and this Honorable Court as follows:

I

That your Complainant is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, and has been for more than two years next preceeding the filing of this Bill; that the Respondent, Mary Koonce Williams, is a non-resident of the State of Alabama, and her address being unknown to your Complainant, and is over the age of twenty-one years.

II

That your Complainant and the Respondent were married on to-wit the 20th day of May, 1933, at Bennetsville, South Carolina, and lived together as husband and wife until on to-wit; the 27th day of February, 1954.

III

That on to wit, the 27th day of February, 1954, the Respondent voluntarily abandoned the bed and board of your Complainant, for more than one year next preceeding the filing of this bill of complaint, since which time the Complainant and the Respondent have not lived together aor in any way recognized each other as husband and wife.

WHEREFORE, the premises considered, your Complainant makeses the said Mary Koonce Williams, a party respondent to this bill of complaint, and in order that the Complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subponea to issue, directly to the said Respondent, com-

manding her to answer, plead or demur to this bill of complaint within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree forever divorcing your Complainant from the said Respondent, and granting the Complainant the right to remarry.

Your Complainant prays for such other, further and different relief as may seem just and proper, and your Complainant will ever pray.

Tracy Williams
Complainant

Solicitor for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Before me, _____, a Notary Public, in and for said County in said State, personally appeared Tracy Williams, known to me and who by me first being duly sworn on oath, doth depose and say:

That he is the Complainant in the above styled cause and that the names, ages and residents of the parties as stated are true and correct.

Tracy Williams

Subscribed and sworn to before me on this the 5th day of May, 1959.

Notary Public, Baldwin Co. Ala.

FILED
MAY 15 1959

8581—NOTE OF TESTIMONY

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

TRACY WILLIAMS

vs.

MARY KOONCE WILLIAMS

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, Testimony of Tracy Williams and S. E. Dutsch

and in behalf of Defendant upon

John D. Pitts

Alice J. Clark
Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY

Circuit Court of Baldwin County

TRACY WILLIAMS

VS.

MARY KOONCE WILLIAMS

Note of Testimony

Filed in Open Court this

FILED

day of JUL 14 1959, 19

ALICE J. DUCK, Register

Register.

MOORE PRINTING CO., BAY MINETTE, ALA.

ORAL DEPOSITION

THE STATE OF ALABAMA BALDWIN COUNTY	Circuit Court of Baldwin County, Alabama (In Equity)
TRACY WILLIAMS	COMPLAINANT
vs.	
MARY KOONCE WILLIAMS	RESPONDENT

I, Ophelia J. Quinley

as Register and Commissioner

have called and caused to come before me Tracy Williams and S. E. Dutsch

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

19 59 , at the office of John V. Duck

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

truth, the whole truth, and nothing but the truth, the said Tracy Willimas and S. E. Dutsch.

doth depose and say as follows:

TESTIMONY OF TRACY WILLIAMS

My name is Tracy Williams. I am the Complainant in the above style cause and am over the age of twenty-one years. I am a resident of Baldwin County, Alabama, and have been for more than two years next preceeding the filing of this divorce action. The Respondent, Mary Koonce Williams, is over the age of twenty-one years and is a non-resident of the State of Alabama, and I do not known where she is. We were married on the 20th day of May, 1933, at Bennetsville, South Carolina, and we lived together until the 27th day of February, 1954. That on the 27th day of February, 1954 the Respondent left me voluntarily and I have not seen nor heard from her since that time. I have not recognized the Respondent as my wife since that time.

Tracy Williams

Tracy Williams

TESTIMONY OF S. E. DUTSCH

My name is S. E. Dutsch. . I am a personal friend of Tracy Williams, the Complainant in the above styled cause. I know of my own personal knowledge that the Respondent abandoned Tracy Williams in February of 1954, and that he has not heard from her or seen her since that time.

S. E. Dutsch

S. E. Dutsch

ORAL EXAMINATION

I, Ophelia J. Quinley 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 me and they signed the same in the presence of myself and John V. Duck

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 day of , 1959 .

Ophelia J. Quinley (L.S.)

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

TRACY WILLIAMS
COMPLAINANT

vs.

MARY KOONCE WILLIAMS
RESPONDENT

ORAL DEPOSITION

Filed FILED , 19
JUL 14 1959
ALICE J. DUCK, Register , Register.
RECORDED IN
Vol. Page Record
, Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Ophelia J. Quinley

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 Tracy Williams and S. E. DUTSCH

a witness in behalf of Tracy Williams in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Tracy Williams

, Complainant

and

Mary Koonce Williams

Respondent

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

Witness 13 day of July, 1959.

Alice J. Huck
Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

TRACY WILLIAMS

Complainant

VS.

MARY KOONCE WILLIAMS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Ophelia J. Quinley

WITNESSES:

Tracy Williams
S. E. Dutsch

FILED
JUL 14 1959
ALICE J. DUCK, Register

4571