

(4725)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Margaret Jaye Dean, Complainant

vs.

Billy B. Dean, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Answer and Waiver~~ 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 Jaye Dean is forever divorced from the said Billy B. Dean for and on account of

Cruelty. IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the Court that the Respondent be awarded the care, custody and control of the minor child, Janet Melissa Dean, for nine months, beginning the last day of August of each year and ending the first day of June of each year; that the Complainant shall have the care, custody and control of the minor child for three months, beginning June 1st of each year and ending the last day of August of each year. It is further ordered that the Complainant and Respondent shall have the right to visit the child when it is in the custody of the other at all reasonable times and places.

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 Margaret Jaye Dean the Complainant pay the cost herein to be taxed, for which executed may issue.

This 9th day of October 1959

Robert M. Stacy

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.

111

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Margaret Jaye Dean

Complainant

vs.

Billy B. Dean

Respondent

**DIVORCE DECREE**

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon BILLY B. DEAN to appear and plead, answer or demur within thirty days from the service hereof to the Bill of Complainant, filed in the Circuit Court of Baldwin County, Alabama, in Equity, by MARGARET JAYE DEAN, as Complainant and against Billy B. Dean, as Respondent.

Witness my hand this the 4 day of October, 1959.

Alice J. Duck  
Register

-----

MARGARET JAYE DEAN	)	
	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA,
	)	
VS	)	IN EQUITY
	)	
BILLY B. DEAN	)	
	)	
RESPONDENT	)	

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

Your Complainant, Margaret Jaye Dean, respectfully represents unto your Honor as follows:

1.

That your Complainant is over 18 years of age and a bona fide resident citizen of Baldwin County, Alabama; that the Respondent is over 21 years of age and a resident citizen of Baldwin County, Alabama.

2.

That your Complainant and Respondent were married to one another in Leaksville, Mississippi, on February 15, 1956, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit, August 8, 1959.

3.

That on to-wit, August 8, 1959, the Respondent struck the Complainant about the face and had hit her several occasions prior to this time; that the Respondent had threatened to kill her on at least one occasion; that on various occasions prior thereto, the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her

person, which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would carry out the threats which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent one child, Janet Melissa Dean, now 2 $\frac{1}{2}$  years old; that both the Complainant and Respondent are fit and suitable persons to have the care, custody and control of their minor child, Janet Melissa Dean.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Billy B. Dean party respondent to this cause of action requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that on a final hearing of this cause, Your Honor will enter a decree granting your Complainant a divorce from the Respondent and granting her the right to remarry; that your complainant prays that the custody of the minor child, Janet Melissa Dean, be awarded in keeping with an agreement signed by the Complainant and the Respondent filed in this cause. That your Honor will award to the Complainant such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

FILED

OCT 9 1953

ALICE J. DUNN, CLERK

Wilters & Brantley

BY: Allen M. Brantley  
Attorneys for the Complainant

4725

MARGARET JAYE DEAN

COMPLAINANT

VS

BILLY B. DEAN

RESPONDENT

BILL OF COMPLAINT

FILED

OCT 9 1959

ALICE J. DUCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Evelyn Watts

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 Jaye Dean and Mary L. Catrett

a witness in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Margaret Jaye Dean is

, Complainant

and Billy B. Dean is

Respondent

on oath, to be by you administered, upon Margaret Jaye Dean and Mary L. Catrett  
to take and certify the deposition s of the witness and return the same to our Court, with all con-  
venient speed, under your hand.

Witness 9 day of

October, 1959

*Alvin J. Duck*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

---

---

THE STATE OF ALABAMA  
Baldwin County

---

---

CIRCUIT COURT

---

---

Margaret Jaye Dean

Complainant

VS.

Billy B. Dean

Defendant

---

---

COMMISSION TO TAKE DEPOSITION

---

---

COMMISSIONER:

Evelyn Watts

WITNESSES:

Margaret Jaye Dean  
Mary L. Catrett

MARGARET JAYE DEAN	)	
	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA,
	)	
VS	)	IN EQUITY
	)	
BILLY B. DEAN	)	
	)	
RESPONDENT	)	

Now comes the Respondent, in his own proper person, and admits the allegations contained in the Bill of Complaint filed in the above styled cause as to ages, residences, marriage and children, but denies all other allegations therein contained and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Billy B. Dean

STATE OF ALABAMA  
BALDWIN COUNTY

I, A. Duck, a Notary Public, in and for said County, in said State, hereby certify that Billy B. Dean, 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 said instrument, he executed the same voluntarily on the day the same bears date. Given under my hand and seal on this the 9th day of October, 1959.

FILED

OCT 9 1959

ALICE J. DUCK, Register

A. Duck  
Notary Public, Baldwin County, Ala.



MARGARET JAYE DEAN

COMPLAINANT

VS

BILLY B. DEAN

RESPONDENT

ANSWER AND WAIVER

FILED

OCT 9 1959

ALICE J. DUCK, Register

THE STATE OF ALABAMA,

BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

Margaret Jaye Dean COMPLAINANT

vs.

Billy B. Dean RESPONDENT

I, Evelyn Watts

as ~~Register and~~ Commissioner

have called and caused to come before me Margaret Jaye Dean and Mary L.

Catrett

witness es named in the requirement for Oral Examination, on the 9th day of October  
19 59, at the office of Wilters & Brantley

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

truth, the whole truth, and nothing but the truth, the said Margaret Jaye Dean and Mary

L. Catrett doth depose and say as follows:

My name is Margaret Jaye Dean. I am the Complainant in the above styled cause. I was married to the Respondent, Billy B. Dean on the 15th day of February, 1956, at Leaksville, Mississippi. There was born to our marriage one child named Janet Melissa Dean, who is now 2½ years old. I separated from Billy during the early part of August of this year. I left him because we had had a fight and Billy had struck me in the face and I was afraid to continue to live with him. The Respondent has struck me on several occasions during our married life and on at least one occasion threatened to take my life. I am afraid of Billy and verily believe that if I continue to live with him he will endanger my life and health during a period of violence.

In my opinion both Billy and I are suitable persons to have the care, custody and control of our minor child, Janet Melissa Dean. I am over 18 years of age and Billy is over 21 years.

Margaret Jaye Dean

My name is Mary L. Catrett. I am over the age of 21 and live in Bay Minette, Alabama, and I am the sister of Billy B. Dean and I know that Billy B. Dean and Margaret Jaye Dean were married to one another in 1956 in the State of Mississippi. That they have lived together as husband and wife until the early part of August of this year. I know of my own personal knowledge that their married life has not been pleasant. In my opinion it would be to the best interest of both parties if they were divorced from one another. On October 8th I saw Billy twisting Margaret's arm and I grabbed him and made him turn Margaret loose. Their married life has been one of constant bickering and quarrelling.

Mary L. Catrett

I, Evelyn Watts 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 Tolbert M. Brantley 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 9th day of October, 19 59.

Evelyn Watts (L. S.)

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

**THE STATE OF ALABAMA,  
BALDWIN COUNTY**

**IN CIRCUIT COURT, IN EQUITY**

Margaret Jaye Dean

COMPLAINANT

vs.

Billy B. Dean

RESPONDENT

**ORAL DEPOSITION**

Filed **FILED** 19\_\_

OCT 9 1959

ALICE J. DUCK, Register  
RECORDED IN

Record

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

Register.

STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That whereas, we Margaret Jaye Dean and Billy B. Dean, husband and wife, are now contemplating obtaining a divorce from one another. That we have a minor child, Janet Melissa Dean, a girl now 2 years old. That we have reached a mutual understanding and agreement relating to the care, custody and control of this minor child which is: That Billy B. Dean shall be given the care, custody and control of this minor child for nine months in the year beginning the last day of August of each year and ending the first day of June of each year; that Margaret Jaye Dean shall have care, custody and control of this said minor child for three months in each year beginning June 1st of each year and ending the last day of August of each year. It is further understood and agreed that each party to this agreement shall have a right to visit with this child at all reasonable times and places while it is in the custody of the other parent. We mutually pray that this Honorable court will take this agreement and consider it in awarding custody of our minor child and on the final decree draw it so that it expresses the wishes and desires of the parties to this instrument in accordance with its terms.

Billy B. Dean  
Margaret J. Dean

STATE OF ALABAMA  
BALDWIN COUNTY

I, Leola M. Brantley, A Notary Public, in and for said County, in said State, hereby certify that Margaret Jaye Dean and Billy B. Dean, whose names are signed to the foregoing instrument, and who are known to me, acknowledged before me on this day that, being informed of the contents of the instrument, they executed the same voluntarily on the day the same bears date.

= Given under my hand and seal on this the 9 day of October, 1959.

FILED

OCT 9 1959

ALICE J. DUCK, Register

Leola M. Brantley  
Notary Public, Baldwin County, Ala.

MARGARET JAYE DEAN

COMPLAINANT

VS

BILLY B. DEAN

RESPONDENTS

CUSTODY AGREEMENT

FILED

OCT 9 1959

ALICE J. DUCK, Register

Margaret Jaye Dean

vs.

Billy B. Dean

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,  
answer and waiver of respondent, custody agreement between Complainant  
and respondent, and testimony of Margaret Jaye Dean and Mary L. Catrett

*Admitted to Practice  
att'y for Complainant*

and in behalf of Defendant upon

*Alice J. Hucker*

Register.

*M*

No. ....

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

**IN EQUITY**  
**Circuit Court of Baldwin County**

Margaret Jaye Dean

VS.

Billy B. Dean

**Note of Testimony**

Filed in Open Court this .....

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

OCT 9 1959

ALICE J. DUCK, Register Register.

MARGARET JAYE DEAN, now	Y	IN THE CIRCUIT COURT OF
MARGARET JAYE LINDSEY,	Y	BALDWIN COUNTY, ALABAMA
Complainant,	Y	IN EQUITY
Vs.	Y	CASE NO. _____
BILLY B. DEAN,	Y	
Respondent.	Y	

DECREE

This cause coming on to be heard was submitted on the Petition of the Complainant and agreement for change of custody, answer and waiver and testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainant and Petitioner is entitled to the relief prayed for in said Petition for Change of Custody.

It is, therefore, Ordered, Adjudged and Decreed by the Court that Margaret Jaye Lindsey be, and she is hereby given the care, custody and control of the minor child born to the union of the Complainant and the Respondent in this cause; said child being Janet Melissa Dean, subject to the Respondent's right to visit and have said child visit with him at all reasonable times and places.

This the 9 day of November, 1961.

Robert M. Howe  
Circuit Judge, Baldwin County, Ala.



THE STATE OF ALABAMA,  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

Margaret Jaye Dean, now COMPLAINANT  
Margaret Jaye Lindsey  
vs.

Billy B. Dean RESPONDENT

I, June B. Hedge

as Register and Commissioner Baldwin County, Alabama

have called and caused to come before me Margaret Jaye Lindsey

witness named in the requirement for Oral Examination, on the 9th day of November  
19 61, at the office of Wilters & Brantley

in Bay Minette, Alabama, and having first sworn said witness to speak the  
truth, the whole truth, and nothing but the truth, the said Margaret Jaye Lindsey

doth depose and say as follows:

My name is Margaret Jaye Lindsey. I am the Petitioner in this cause. That on the 9th day of October, 1959, I was divorced from Billy B. Dean for an on account of cruelty by a decree rendered by this Honorable Court. That the custody of Janet Melissa Dean, our child, was given to Billy B. Dean for 9 months and to me for 3 months of each year. That since the time of this divorce I have re-married and I am presently living in a comfortable home in a good environment. That Billy has a job in another town and is living in a boarding house. That Janet is now living with one of his sisters. Billy and I have discussed the matter of custody of this said child and we have concluded that it would be to the best interest of this said child if I be given its full care, custody and control, and we have reached an agreement to this effect. I respectfully request the Court to consider the change of custody and the agreement which Billy and I have reached and will render a decree granting the relief I asked for in my Petition for Change of Custody.

Margaret J. Lindsey  
Margaret Jaye Lindsey

FILED

NOV 9 1961

ALICE J. DUCK, CLERK  
REGISTER

ORAL EXAMINATION

I, June B. Hedge 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 Tolbert M. Brantley 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 9th day of November, 19 61.

June B. Hedge (L. S.)

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

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**IN CIRCUIT COURT, IN EQUITY**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ vs. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**COMPLAINANT**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**RESPONDENT**

\_\_\_\_\_

**ORAL DEPOSITION**

Filed \_\_\_\_\_, 19 \_\_\_\_\_

\_\_\_\_\_ Register.

**RECORDED IN**

\_\_\_\_\_ Record

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

\_\_\_\_\_ Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: June B. Hedge

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 Jaye Lindsey

a witness in behalf of Margaret Jaye Lindsey in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein

Margaret Jaye Dean, now  
Margaret Jaye Lindsey

, Complainant

and

Billy B. Dean

Respondent

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

Witness 9th day of November

1961.

  
Register

Commissioner's Fee, \$

Witness' Fees, \$

NO. ....

**STATE of ALABAMA**  
Baldwin County

**CIRCUIT COURT**

Complainant

vs.

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

WITNESSES:

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

MARGARET JAYE DEAN, now	⌘	IN THE CIRCUIT COURT OF
MARGARET JAYE LINDSEY,		
	⌘	BALDWIN COUNTY, ALABAMA
Complainant,		
	⌘	IN EQUITY
Vs.		
	⌘	CASE NO. <u>4725</u>
BILLY B. DEAN,		
	⌘	
Respondent.	⌘	


PETITION FOR CHANGE OF CUSTODY

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

Comes now Margaret Jaye Lindsey and shows unto the Court that on the 9th day of October, 1959, your Honor entered a decree divorcing your Petitioner, whose name at that time was Margaret Jaye Dean, from Billy B. Dean for and on account of cruelty. That as a part of the Court's decree, the Respondent, Billy B. Dean, was awarded the care, custody and control of Janet Melissa Dean, a minor child born to the union of the Complainant and Respondent, for a period beginning the last day of August of each year and ending the first day of June of each year. That your Petitioner and the Complainant was given the care, custody and control of said minor child for the balance of the year. That since the time of this divorce decree, the Complainant has re-married. That the Respondent is now living in a boarding house, and is not living with the said minor child except for occassional visits.

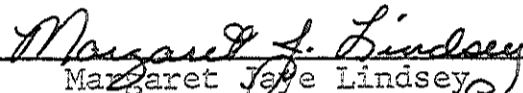
Your Petitioner further shows unto the Court that she and the Respondent have discussed the matter of the change of custody of said minor child and both have concluded that it would be to the best interest of Janet Melissa Dean if her custody be awarded to your Petitioner, Margaret Jaye Lindsey. That both parties to this cause have entered into an agreement relative to said custody.

Premises considered, your Petitioner prays that upon consideration of this Petition, and the agreement for change of custody attached hereto, that Your Honor will amend his divorce decree rendered on the 9th day of October, 1959, so as to grant the relief sought by your Petitioner.

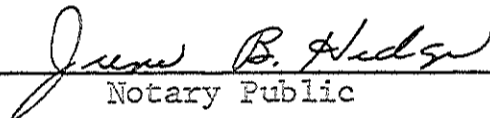
  
Margaret Jaye Lindsey

STATE OF ALABAMA  
BALDWIN COUNTY

Personally appeared before me the undersigned authority who, after being by me first duly sworn, deposes and says, that she has read the foregoing Petition and that the same is true and correct.

  
Margaret Jaye Lindsey

Sworn to and subscribed before me on this the 9<sup>th</sup> day of November, 1961.

  
Notary Public

  
FILED

NOV 9 1961

ALICE I. DUCK, CLERK  
REGISTER

150-B

MARGARET JAYE DEAN,  
now MARGARET JAYE LINDSEY,

Complainant,

Vs.

BILLY B. DEAN,

Respondent.

X  
X  
X  
X  
X  
X

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

AGREEMENT FOR CHANGE OF CUSTODY

Comes now the Complainant and Respondent in the above styled cause and shows unto the Court that on the 9th day of October, 1959, Your Honor entered a divorce decree granting Margaret Jaye Dean a divorce from Billy B. Dean for an on account of cruelty. That the Court awarded the custody of the minor child, Janet Melissa Dean, a girl now about four years old, to the Respondent, for 9 months of each year beginning the last day of August of each year and ending the first day of June of each year and giving, Margaret Jaye Dean, custody of said minor child for the balance of the year. That the parties to this suit entered an agreement at the time of this divorce in which they agreed to the custody awarded by this Court. The parties to this agreement further show unto the Court that since the date of this decree, the Complainant has re-married and is now married to Charles Jack Lindsey, Jr. That the Respondent has not re-married. That the Complainant and Respondent have discussed the matter of custody of this said minor child with one another and both have concluded and mutually agreed that it would be to the best interest of said minor child that the care, custody and control of Janet Melissa Dean be awarded to Margaret Jaye Dean now Margaret Jaye Lindsey and both parties to this agreement respectfully request the Court to enter an order changing the custody of said minor child so that it be given to Margaret Jaye Lindsey, and give the Respondent, Billy B. Dean, the right to visit said child at all reasonable times and places.

150-C

Billy B. Dean  
Margaret J. Lindsey

Billy B. Dean

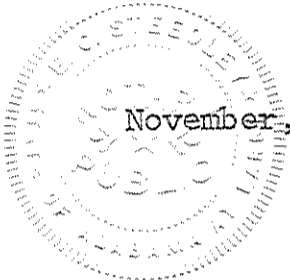
Margaret J. Lindsey

STATE OF ALABAMA

Baldwin COUNTY

I, C. C. Stuebelly, a Notary Public, in and for said County, in said State, hereby certify that Margaret Jaye Lindsey, 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, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 7 day of November, 1961.



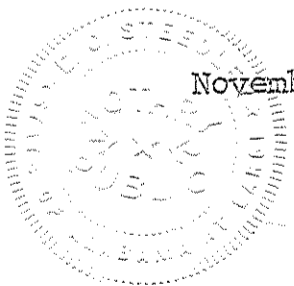
C. C. Stuebelly  
Notary Public

STATE OF ALABAMA

Baldwin COUNTY

I, C. C. Stuebelly, a Notary Public, in and for said County, in said State, hereby certify that Billy B. Dean, 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 the same bears date.

Given under my hand and seal on this the 7 day of November, 1961.



C. C. Stuebelly  
Notary Public

FILED

NOV 9 1961

ALICE J. DUCK, CLERK REGISTER



MARGARET JAYE DEAN,  
now, MARGARET JAYE LINDSEY,

Complainant,

Vs.

BILLY B. DEAN,

Respondent.

X  
X  
X  
X  
X  
X

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

CASE NO. \_\_\_\_\_

Now comes the Respondent in his own proper person, and admits the allegations contained in the Petition to Modify Custody filed in the above styled cause as to ages, residences, marriages and children, but denies all other allegations therein contained and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony on behalf of the Complainant; the right to cross examine Complainant's witnesses and agrees that this cause be submitted for final decree without further notice.

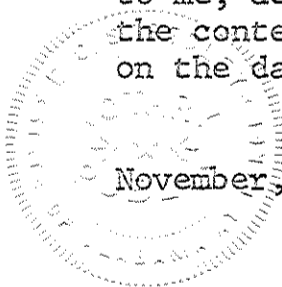
Billy B. Dean

STATE OF ALABAMA  
Baldwin COUNTY

I, E. C. Stalley, a Notary Public, in and for said County, in said State, hereby certify that Billy B. Dean, 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 said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 7 day of November, 1961.

E. C. Stalley  
Notary Public



FILED

NOV 9 1961

ALICE J. DUCK, CLERK REGISTER

150-E