

4768

DOROTHY L. KELSOE
Complainant,
-vs-
BUFORD C. KELSOE,
Respondent.

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

TO THE HONORABLE JUDGES OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, SITTING IN EQUITY:

Comes the Complainant and shows unto Your Honors and unto
this Honorable Court as follows:

ONE

Complainant is the wife of the Respondent and they were
married to each other on September 8, 1959 in Mobile, Alabama.
Both the Complainant and the Respondent are bona-fide resident
citizens of the State of Alabama and both the Complainant and
the Respondent are each over the age of twenty-one years. There
are no minor children as issue of their marriage.

TWO

The Respondent has committed actual violence upon the person
of the Complainant, attended with danger to her life and health,
and from his conduct there is reasonable apprehension of such
violence.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of
this cause, will make the said Buford C. Kelsoe, party-respondent
hereto, and will cause him to appear, plead, answer or demur
hereto, within the time allowed by law and the rules of this
Honorable Court.

PRAYER FOR RELIEF

Complainant further prays that Your Honors will see fit to grant her an absolute divorce from the bonds of matrimony with the Respondent, and Complainant further prays for such other, further or different relief as in equity she may be due, and as in duty bound she will ever pray, etc.

William Simpson
SOLICITOR FOR COMPLAINANT.

Filed 11-18-59
A. J. [unclear]
[unclear]

DOROTHY L. KELSOE Complainant
No. Vs. Defendant
BUFORD C. KELSOE

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

ANSWER AND WAIVER

Comes the defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegations of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

I further agree that Peggy Preston, may take the testimony in this cause without the issuance of a commission.

Buford C. Kelsoe
Defendant

Complainant agrees that Peggy Preston, may take the testimony in this cause as commissioner, without issuance of a commission.

Dorothy L. Kelsoe
Complainant

NOTE: The space below is intended for "Agreements Between the Parties".

Buford C. Kelsoe
Complainant.

Peggy S. Preston
Respondent.

STATE OF ALABAMA
COUNTY OF MOBILE

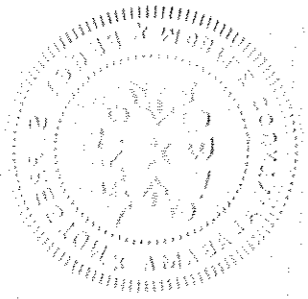
I, PEGGY S. PRESTON, a NOTARY PUBLIC in and for said State and County, do hereby certify that Buford C. Kelsoe, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, he executed the same voluntarily on the day same bears date.

Witness my hand and seal this 17th day of November, 1959

Peggy S. Preston
NOTARY PUBLIC

Filed STATE OF ALABAMA
COUNTY OF MOBILE

Register



RECORDED

No.

4168

Vs.

ANSWER AND WAIVER

FILED

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ALICE J. DUCK, CLERK
REGISTER