

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

1781

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

WANDA JEAN COTTONGIM

Complainant

vs.

FRANK R. COTTONGIM

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 Wanda Jean Cottongim is forever divorced from the said Frank R. Cottongim

for and on account of Cruelty. IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the court that the Complainant be and she is hereby awarded the care, custody and control of the minor child, Wanda Diane Cottongim, subject to the right of the Respondent to visit and to have the child visit him at reasonable times and for reasonable periods.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent pay to the Complainant the sum of Forty (\$40.00) Dollars per month for the support and maintenance of the minor child, the payments to be due on the 1st day of each month.

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 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 Frank R. Cottongim the Respondent pay the cost herein to be taxed, for which executed may issue.

This 15th day of February 1960

Hubert M. Kelly

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.

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No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Wanda Jean Cottongim

Complainant

vs.

Frank R. Cottongim

Respondent

DIVORCE DECREE

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

Wanda Jean Cottongim

COMPLAINANT

vs.

Frank R. Cottongim

RESPONDENT

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Wanda Jean Cottongim and Mable H. Thompson

witnesses named in the requirement for Oral Examination, on the 13 day of Feb.

19 60, at the office of Wilters & Brantley

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

truth, the whole truth, and nothing but the truth, the said Wanda Jean Cottongim and Mable

H. Thompson

doth depose and say as follows:

My name is Wanda Jean Cottongim. I am over 21 years of age and a bona fide resident citizen of Baldwin County, Alabama, and have so resided for the past two years. The respondent is over the age of 21 years and a resident citizen of the State of Alabama. The Respondent and I were married to one another on February 7, 1953, at Lucedale, Mississippi. We lived together as husband and wife until November 7, 1959. There was born to our union one child, whose name is Wanda Diane Cottongim; she is now 4 1/2 years old. On November 7, 1959, my husband, Frank R. Cottongim, struck me about the face and body and attempted to choke me. One one occasion my husband threatened to break my neck. From my husband's action toward me I am afraid that if I continue to live with him he will do actual physical violence to my person which would endanger my life and health. I feel that I am a fit and proper person to have the care, custody and control of my minor child. I am living with my mother, Mrs. Mabel Thompson in Stockton, Alabama. This is a large, comfortable and christian home. My husband is not a fit and proper person to have the care, custody and control of my minor child. He leads a wild life and frequently gets drunk. My husband is an able bodied man and according to my best information and belief he is making approximately \$80.00 per week. We have no property personal or real that needs to be divided by your Honor's decree.

The Respondent and I have entered into a mutual agreement relative to the custody and support for our minor child and I respectfully request the court to consider it in entering his decree in this matter.

Wanda Jean Cottongim

My name is Mable H. Thompson. I am the mother of Wanda Jean Cottongim I know that she and Frank are both over the age of 21 years and are residents of the State of Alabama; that they were married to one another on February 7, 1953, in Lucedale, Mississippi, and that there was born to their union one child, Wanda Diane Cottongim. In my opinion my daughter is in every respect a fit and proper person to have the care, custody and control of her minor child; that her husband, Frank R. Cottongim, is not. I know that he leads a wild life and frequently gets drunk. In my presence they had frequent quarrells and in my opinion it is their best interest and their minor child that they be divorced.

Mable H. Thompson

ORAL EXAMINATION

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 13th day of February, 1960.

Evelyn Watts (L. S.)

No. _____	Page _____
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
Wanda Jean Cottingham	
COMPLAINANT	
vs.	
Frank R. Cottingham	
RESPONDENT	
ORAL DEPOSITION	
Filed FILED _____, 19 _____	
FEB 15 1960	Register.
ALICE J. DUCK RECORDED IN	
Record _____	
Vol. _____	Page _____
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 Wanda Jean Cottongim and Mable H. Thompson

a witness in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Wanda Jean Cottongim is

, Complainant

and Frank R. Cottongim is

Respondent

on oath, to be by you administered, upon Wanda Jean Cottongim and Mable H. Thompson to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 15 day of February

, 1956

Alice J. Duck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Wanda Jean Cottongim

Complainant

VS.

Frank R. Cottongim

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

Wanda Jean Cottongim

Mable H. Thompson

FILED
FEB 15 1960

ALICE J. DUCK, Register

Wanda Jean Cottongim

vs.

Frank R. Cottongim

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Plaintiff upon the original Bill of Complaint,
answer and waiver, testimony of Wanda Jean Cottongim and Mable H. Thompson
and agreement

and in behalf of Defendant upon agreement

Robert M. Brown

Alice J. Tucker
Register.

ML

No. -----

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Wanda Jean Cottongim

VS.

Frank R. Cottongim

Note of Testimony

Filed in Open Court this -----

day of -----, 19-----

FILED
FEB 15 1960

Register.

ALICE I. DIXON REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon FRANK R. COTTONGIM to appear and plead, answer or demur within thirty days from the service hereof to the Bill of Complaint, filed in the Circuit Court of Baldwin County, Alabama, in Equity, by WANDA JEAN COTTONGIM, as Complainant, and against FRANK R. COTTONGIM, as Respondent.

Witness my hand this the 8 day of December, 1959.

Beijing J. Rouse
Register

Exp: 1-22-60 -----

WANDA JEAN COTTONGIM)	
)	IN THE CIRCUIT COURT OF
COMPLAINANT)	BALDWIN COUNTY, ALABAMA,
VS)	
)	IN EQUITY
FRANK R. COTTONGIM)	
)	
RESPONDENT)	

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

Your Complainant, Wanda Jean Cottongim, respectfully represents unto your Honor as follows:

1.

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

2.

That your Complainant and Respondent were married on February 7, 1953, in Lucedale, Mississippi, and lived together as husband and wife until on to-wit, November 7, 1959.

3.

That on to-wit, the 7th day of November, 1959, the Respondent struck the Complainant and has hit her on several occasions prior to this time; that on one occasion the Respondent threatened to break your Complainant's neck. The Complainant further avers that on many occasions the Respondent abused your Complainant and threatened to do actual violence on her person

which would necessarily endanger her life and health and the conduct of the Respondent was on these occasions and especially on the last occasion mentioned herein 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 that he would carry out his threats which would necessarily endanger her life and health.

4.

That there was born to this marriage between your Complainant and Respondent one child, Wanda Diane Cottongim, now $3\frac{1}{2}$ years old; that the Complainant is in every respect a fit and proper person to have the care, custody and control of this minor child; that she lives in the home of her mother, Mrs. Mabel H. Thompson, which is a large and comfortable home. Your Complainant avers that the Respondent is not a fit and proper person to have the care, custody and control of the said minor child; that he leads a wild and desolute life; that he gets drunk very frequently. The Complainant further avers that the Respondent is an able bodied man and she is informed and believes and states on such information and belief that the Respondent makes \$80.00 per week.

WHEREFORE, the premises considered, your Complainant prays that Your Honor will by proper process make the said Frank R. Cottongim 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 be awarded the care, custody and control of the minor child, Wanda Diane Cottongim; Your Complainant further prays that Your Honor will order the Respondent to pay the Complainant support money for his minor child; 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.

Wilters & Brantley

BY: J. Robert M. Brantley
Solicitors for the Complainant

FILED

DEC 9 1933

Alice L. Nick, CLERK REGISTER

A 781

WANDA JEAN COTTONGIM

COMPLAINANT

VS

FRANK R. COTTONGIM

RESPONDENT

BILL OF COMPLAINT

FILED
DEC 8 - 59
ALICE J. DUCK, CLERK REGISTER

Received 9 day of Dec 1959
and on 22 day of Jan 1960
served a copy of the within A. J. C.
on Frank R. Cottongim

By service on _____

~~TAYLOR WILKINS, Sheriff~~

By _____ D. S.

*T. Wilmer Shields, Sheriff Maricopa Co
by E. Lolley, D.S.*

THE SHERIFF CLAIMS none

MILES AT 10¢ PER MILE FOR A

TOTAL OF \$ None

~~WILMER SHIELDS, SHERIFF~~

[Faint, mostly illegible text, likely bleed-through from the reverse side of the document]

WANDA JEAN COTTONGIM)	IN THE CIRCUIT COURT OF
COMPLAINANT)	BALDWIN COUNTY, ALABAMA,
VS)	IN EQUITY
FRANK R. COTTONGIM)	
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.

Frank R. Cottongim

STATE OF ALABAMA
COUNTY OF Tarrant

I, M. W. [Signature], a Notary Public, in and for said County, in said State, hereby certify that Frank R. Cottongim, 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 3rd day of Feb., 1960.

FILED

FEB 15 1960

ALICE J. DUCK, Register

[Signature]
Notary Public,

WANDA JEAN COTTONGIM

COMPLAINANT

VS

FRANK R. COTTONGIM

RESPONDENT

ANSWER AND WAIVER

FILED

FEB 15 1960

ALICE J. DUCK, Register



STATE OF ALABAMA

BALDWIN COUNTY

KNOW ALL MEN BY THESE PRESENTS, That we WANDA JEAN COTTONGIM and FRANK R. COTTONGIM, man and wife, in contemplation of divorce do now make the following agreement as to custody and support of our minor child Wanda Diane Cottongim.

It is mutually understood and agreed that Wanda Jean Cottongim shall have the care, custody and control of this minor child, and Frank R. Cottongim shall have the right of reasonable visitation at all reasonable times and places. It is further understood and mutually agreed that Frank R. Cottongim shall pay Wanda Jean Cottongim the total sum of Forty (\$40.00) Dollars per month for the support and maintenance of said minor child, these payment to begin on the 1st day of each month.

We the undersigned respectfully submit this agreement to the court for its consideration in determining the custody and amount of support money of and for Wanda Diane Cottongim upon a final decree of this matter.

Done this 30 day of Feb, 1960.

Witnesses

Edward M. Brancy
Edwin Watter
W. M. [unclear]
Bernice Vick

Wanda Jean Cottongim
Frank R. Cottongim

FILED

FEB 15 1960

ALICE J. DUCK, Register

4781

WANDA JEAN COTTONGIM

COMPLAINANT

vs
FRANK R. COTTONGIM
RESPONDENT

AGREEMENT

FILED
FEB 15 1960
ALICE J. DUCK, Register

WANDA JEAN COTTONGIM
COMPLAINANT
VS
FRANK R. COTTONGIM
RESPONDENT