

4187

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

VERA RICHERSON HOSFORD, Complainant

vs.

WINFORD D. HOSFORD, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~DEKRETO COLOREX~~ 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 VERA RICHERSON HOSFORD is forever divorced from the said WINFORD D. HOSFORD 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 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 VERA RICHERSON HOSFORD the COMPLAINANT pay the cost herein to be taxed, for which executed may issue.

This 15th day of December 1959

Hubert M. Hester

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.

No. ----- Page -----

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

*Filed 17-11-29  
Clifford H. Houch  
Register*

*[Faint, illegible text in the right-hand column, likely bleed-through from the reverse side of the page.]*

VERA RICHERSON HOSFORD  
COMPLAINANT  
VS  
WINFORD D. HOSFORD  
RESPONDENT

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

Now comes the Respondent and accepted service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint 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.

Winford D. Hosford

STATE OF ALABAMA  
BALDWIN COUNTY

I, C. Davis Thompson, a Notary Public, in and for said county, in said State, hereby certify that Winford D. Hosford, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal this 11th day of December, 1959.

C. Davis Thompson  
Notary Public, Baldwin County, Alabama

FILED  
DEC 11 1959

WILLIE J. DUCK, Registrar

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

VERA RICHESON HOSFORD COMPLAINANT

vs.

WINFORD D. HOSFORD RESPONDENT

I, Helen McDowell

as Register and Commissioner

have called and caused to come before me Vera Richerson Hosford

witness named in the requirement for Oral Examination, on the 11 day of Dec.  
1959, at the office of Thompson & White

in Bay Minette, Alabama, and having first sworn said witness to speak the  
truth, the whole truth, and nothing but the truth, the said Vera Richerson Hosford

doth depose and say as follows:

My name is Vera Richerson Hosford. I am over the age of 21 and have been a resident of Baldwin County all my life. The Respondent is over the age of 21 and has been a resident of Baldwin County more than two years next preceding. We were married in Leaksville, Mississippi, on June 12, 1954, and lived together as husband and wife until a child, Ricky Hosford was born after which we were divorced on April 4, 1956, and remarried on May 19, 1956, at Clovis, New Mexico. Another child was born of this second marriage, Danny Hosford now about three years of age. We lived together as husband and wife until our separation in Alabama on or about March 15, 1958, at which time the Respondent abandoned me without fault on my part. I have had the care, custody and control of these children since their birth and respectfully ask this Honorable Court to give me the permanent care, custody and control of my children. I do not believe we will ever live together again as husband and wife and respectfully ask for a divorce. There is no property to be divided.

Vera Richerson Hosford

I, Helen McDowell 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 C. LeNoir Thompson 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 11 day of December, 1959.  
Helen McDowell (L. S.)

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

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**IN CIRCUIT COURT, IN EQUITY**

VERA RICHMOND HOSFORD  
COMPLAINANT

vs.

WINFORD D. HOSFORD  
RESPONDENT

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**ORAL DEPOSITION**

Filed FILED 19 \_\_\_\_\_

DEC 11 1959

Alice Recorder  
Register.

Record

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

Register.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

VERA RICHEYSON HOSFORD COMPLAINANT

vs.

WINEFORD D. HOSFORD RESPONDENT

I, Helen McDowell

as Register and Commissioner

have called and caused to come before me Matt McKinley

witness named in the requirement for Oral Examination, on the 11 day of Dec  
19 59, at the office of Thompson & White  
in Bay Minette, Alabama, and having first sworn said witness to speak the  
truth, the whole truth, and nothing but the truth, the said Matt McKinley

doth depose and say as follows:

My name is Matt McKinley. I know both parties to this cause. They are both over the age of 21 and have been residents of Alabama all their life. They were first married in Leaksville, Mississippi, on or about June 12, 1954, and lived together as husband and wife until shortly prior to a divorce granted the parties on April 4, 1956. One child, Ricky Hosford, was born as fruits of this marriage, age about 4½ years. On May 19, 1956 they were remarried at Clovis, New Mexico and lived together upon their return to Alabama until on or about March 15, 1958. There was born as fruits of this second marriage one child, Danny Hosford, age about 3 years. There is no property to be divided. The Complainant has had the care, custody and control of the minor children since birth and I respectfully represent that she is a fit, suitable and proper person, maintaining a Christian home, to have the permanent care, custody and control of the minor children. I do not believe that they will ever live together as husband and wife again, since the Respondent abandoned the Complainant on or about March 15, 1958 without fault on her part.

Matt McKinley

I, Helen McDowell 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 him and he signed the same in the presence of myself and C. LeNoir Thompson 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 11 day of December, 1959.

Helen McDowell (L. S.)

No. _____ Page _____	THE STATE OF ALABAMA BALDWIN COUNTY IN CIRCUIT COURT, IN EQUITY
VERA RICHERRSON HOSFORD COMPLAINANT	
vs. WINFORD D. HOSFORD RESPONDENT	
ORAL DEPOSITION	
FILED DEC 11 1959	
Vol. _____ Page _____ RECORDED IN _____ Record _____	_____ 10 _____ ALICE J. DUCK, Register REGISTERED IN _____ Register.

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon WINFORD D. HOSFORD, 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 VERA RICHERSON HOSFORD, as Complainant and against WINFORD D. HOSFORD, as Respondent.

WITNESS my hand this the 11 day of Dec., 1959.

*Alice J. Luck*  
Register.

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VERA RICHERSON HOSFORD	*	IN THE CIRCUIT COURT OF
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA,
VS	*	IN EQUITY.
WINFORD D. HOSFORD	*	CASE NO. _____
RESPONDENT	*	

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

Your Complainant, Vera Richerson Hosford, respectfully represents unto Your Honor and this Honorable Court as follows:

-1-

That your Complainant is over the age of 21 and a resident of Baldwin County, Alabama, and has been more than two years next preceding; The Respondent is over the age of 21 and is a resident of Baldwin County, and has been more than two years next preceding.

-2-

Your Complainant and the Respondent were first married in Leaksville, Mississippi on June 12, 1954 and lived together as husband and wife until shortly prior to a divorce granted the parties on April 4, 1956. One child, Ricky Hosford, was born as fruits of this marriage and is now about 4½ years of age.

-3-

On May 19, 1956, the Complainant and the Respondent were married at Clovis, New Mexico, and lived together as husband and wife upon their return to Alabama until on or about the 15th day of March, 1958.



That on to-wit, March 15, 1958, while your Complainant and the Respondent were living together as husband and wife, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

There was born as fruits of the second marriage one child, Danny Hosford, age about three years. Both children are presently in the care, custody and control of your Complainant.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Winford D. Hosford, party Respondent to this bill of complaint 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 upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; That a decree be made awarding to the Complainant the care, custody and control of the minor children, Ricky Hosford, age 4½, and Danny Hosford, age 3, and your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

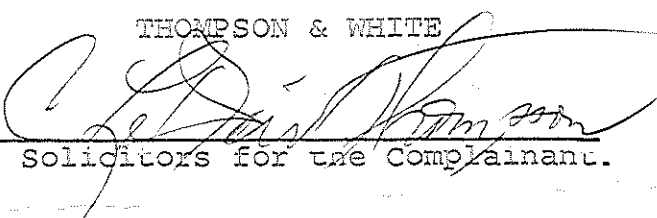
FILED

DEC 11 1959

ALICE J. DUCK, Register

THOMPSON & WHITE

BY:

  
Solicitors for the Complainant.

4789

VERA RICHERSON HOSFORD

COMPLAINANT

VS

WINFORD D. HOSFORD

RESPONDENT

BILL OF COMPLAINT

FILED

DEC 11 1959

ALICE J. DUCK, Register

\* \* \* \* \*  
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VERA RICHERRSON HOSFORD

vs.

WINFORD D. HOSFORD

\_\_\_\_\_

\_\_\_\_\_

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 Vera Richerson Hosford and Matt McKinley

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

and in behalf of Defendant upon \_\_\_\_\_ answer and waiver

\_\_\_\_\_

\_\_\_\_\_

*C. L. Davis Thompson*

*Alice J. Clark*  
 Register.

111

No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

**VERA RICHEYSON HOSFORD**

vs.

**WINFORD D. HOSFORD**

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of ....., 194 .....

**Register.**

Printed by the Baldwin Times

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: HELEN McDOWELL

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

VERA RICHERSON HOSFORD

AND

MATT MCKINLEY

a witness in behalf of VERA RICHERSON HOSFORD in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein

VERA RICHERSON HOSFORD

, Complainant

and

WINFORD D. HOSFORD

Respondent

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

Witness " day of *all*

, 195 *9*

*Alice J. Cook*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

28377

VERA RICHESON HOSFORD

VS. Complainant

WINFORD D. HOSFORD

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

HELEN McDOWELL

WITNESSES:

VERA RICHESON HOSFORD  
MATT MCKINLEY

FILED  
DEC 11 1959

ALICE J. DUCK, Register