

DOROTHY MAE PORTER BRACY,

Complainant

No. 4809 vs.

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

JOHN HENRY BRACY,

Defendant

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 Carolyn Fairley, may take the testimony in this cause without the issuance of a commission.

John Henry Bracy
Defendant

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

Walter Lee as
Complainant

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

Waiver for Complaint

WITNESSED SIGNING OF DOROTHY MAE PORTER BRACY IN ONE PLACE HEREON.

STATE OF *Washington*
COUNTY OF *King*

I, *Eben L. Munson*, a NOTARY PUBLIC in and for said State and County, do

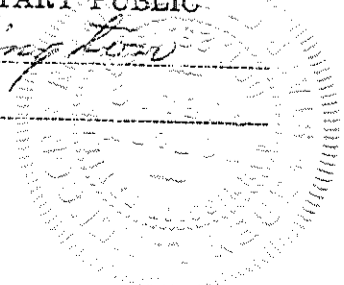
hereby certify that JOHN HENRY BRACY, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, *is true* executed the same voluntarily on the day same bears date.

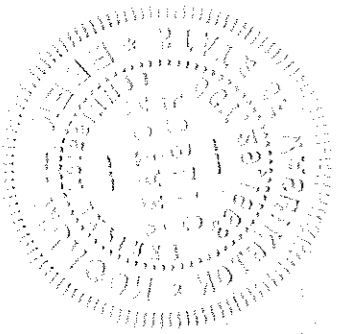
Witness my hand and seal this *14* day of *Jan*, 19*60*

Eben L. Munson
NOTARY PUBLIC

Filed _____
Register _____

STATE OF *Washington*
COUNTY OF *King*





RECORDED

No. 4409

Vs.

ANSWER AND WAIVER

Filed, _____, 19

FILED

JAN 30 1960

ALICE J. DUCK, CLERK
REGISTER

WALTER J. LEE
LAWYER
VAN ANTWERP BLDG.
MOBILE, ALABAMA

January 5, 1960

The Honorable Register
Circuit Court of Baldwin County
Baldwin County Court House
Bay Minette, Alabama

RE: DOROTHY MAE PORTER BRACY, -vs- JOHN HENRY BRACY
A Bill For Divorce

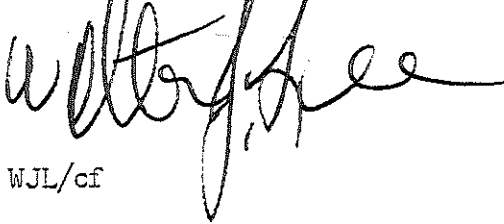
Honorable Sir:

I lodge herewith the Original Bill in the above cause
for filing.

I am not forwarding a carbon copy for the Respondent,
since I expect to obtain an Answer and Waiver.

If there are any questions concerning this matter,
please call me long distance collect at HEmlock 3-5952,
Mobile, Alabama.

Respectfully,



WJL/cf

Enclosures

DOROTHY MAE PORTER BRACY,)

Complainant,)

-vs-

JOHN HENRY BRACY,)

Respondent.)

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY, NO. _____

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

Comes now, Dorothy Mae Porter Bracy, Complainant, and respectfully represents:

1) THAT she and Respondent are each over the age of twenty-one years; and that she and Respondent are bona-fide resident citizens of the State of Alabama, and have been such for a period of time in excess of one year next immediately preceding the filing of this Bill of Complaint.

2) THAT Complainant is the lawful wife of the Respondent, having been lawfully married to him on, to-wit: June 7, 1958, at, to-wit: Jackson, Mississippi, of which marriage no children have been born.

3) THAT the respondent voluntarily abandoned her bed and board more than one year next immediately preceding the filing of this Bill of Complaint, since which time Complainant and Respondent have not lived together, nor in any way recognized each other as Husband and Wife.

PRAYER FOR PROCESS:

Complainant prays that upon the filing of this Bill of Complaint that proper process issue to John Henry Bracy, making him a party respondent and requiring him to appear and plead, answer or demur to the allegations thereof within the time required by law and the rules of this Honorable Court.

PRAYER FOR RELIEF:

Complainant prays that upon the final hearing hereof that Your Honors will grant to her an absolute divorce from the Respondent and the right to remarry in the event she should so care, and grant to her the right to resume the use of her maiden name, viz: Dorothy Mae Porter; and will grant such other and further relief as she may be entitled in the premises and as to Your Honors seems meet and proper.

SUBSCRIBED and sworn to before me
this ___ day of January, 1960.

Notary Public, State of Alabama
At Large.

[Handwritten signature]
Complainant
[Handwritten signature]
Witness for Complainant

FILED

JAN 6 1960

ALICE L. DUCK, CLERK
REGISTER