

4819

WILLIAM L GREEN
LAWYER
P. O. BOX 1048
MOBILE, ALABAMA

February 9, 1960

Mrs. Alice J. Duck
Register, Circuit Court
Baldwin County, Alabama
Bay Minette, Alabama

RE: Danya Jones Davison
VS: Howard Morris Davison
Case # 4841

Dear Mrs. Duck:

The Respondent in the above entitled cause has executed an answer and waiver in said cause and I enclose the same and respectfully request that it be filed.

My secretary, the commissioner agreed upon by the parties in this cause, has set the taking of testimony for 4:00 o'clock P.M. on February 11, 1960, and I expect that the same will be forwarded promptly.

Very truly yours,


WILLIAM L GREEN

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

JOHN ALEXANDER RIMBOS, Complainant

vs.

MARGARET RIMBOS, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on Answer & Waiver of Respondent 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 John Alexander Rimbos is forever divorced from the said Margaret Rimbos for and on account of voluntary abandonment.

It is further ORDERED, ADJUDGED AND DECREED by the Court that Margaret Rimbos, the respondent in this cause, shall have the permanent care, custody and control of Patricia A. Rimbos and Peter A. Rimbos, the minor children of said parties.

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 John Alexander Rimbos the complainant pay the cost herein to be taxed, for which executed may issue.

This 18th day of January 1960

Hubert M. Stone

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.

FILED JAN 18 1960

ALICE J. DUCK, Register

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

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

JOHN ALEXANDER RIMBOS
Complainant

vs.

MARGARET RIMBOS
Respondent

DIVORCE DECREE

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THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

JOHN ALEXANDER RIMBOS, COMPLAINANT

vs.

MARGARET RIMBOS, RESPONDENT

I, Juanita Franklin

~~as Register and Commissioner~~ in the above styled cause

have called and caused to come before me John Alexander Rimbos

witness named in the requirement for Oral Examination, on the 18th day of January
19 , at the office of James R. Owen

in Bay Minette, Alabama, and having first sworn said witness to speak the
truth, the whole truth, and nothing but the truth, the said John Alexander Rimbos

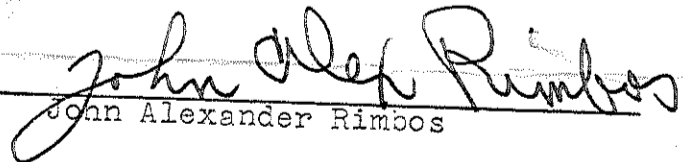
doth depose and say as follows:

My name is John Alexander Rimbos and I am the complainant in the above styled cause.

The respondent and I were lawfully married on July 8, 1939, in Baltimore Maryland.

The respondent voluntarily abandoned my bed and board for more than one year next preceding the filing of this bill of complaint and we have not lived together nor in anyway recognized each other as husband and wife since that time.

The respondent and I have two children, Patricia A. Rimbos and Peter A. Rimbos, aged 13 and 15 respectively, who are now in the care, custody and control of the respondent, and she is a fit and proper person to have the care, custody and control of said minor children.


John Alexander Rimbos

I, Juanita Franklin ~~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 _____ 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 18th day of January, 1960.

Juanita Franklin (L. S.)

No. _____ Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

JOHN ALEXANDER RIMBOS,
COMPLAINANT

vs.

MARGARET RIMBOS,
RESPONDENT

ORAL DEPOSITION

Filed **FILED**, 19

JAN 18 1960, Register.

ALICE J. RECORDED
DEPOSITION

Record

Vol. _____ Page _____

Register.

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JOHN ALEXANDER RIMBOS,
Complainant,

vs.

MARGARET RIMBOS,
Respondent

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, and testimony of John Alexander Rimbos

and in behalf of Defendant upon Answer and Waiver

Alice J. Hook
Register.

James R. Owen,
Solicitor for Complainant.

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

JOHN ALEXANDER RIMBOS

vs.

MARGARET RIMBOS

NOTE OF TESTIMONY

Filed in Open Court this _____

day of _____, 194

FILED
JAN 18 1960

ALICE J. DUCK, Register Register.

Printed by the Baldwin Times

JOHN ALEXANDER RIMBOS,)	IN THE CIRCUIT COURT OF
Complainant,)	
VS.)	BALDWIN COUNTY, ALABAMA
MARGARET RIMBOS,)	IN EQUITY.
Respondent.)	

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

Your complainant, John Alexander Rimbos, respectfully represents and shows unto the Court and your Honor as follows:

1. The complainant is over the age of twenty-one years and is a resident of Baldwin County, Alabama.

The respondent is over the age of twenty-one years and is a resident of the State of Maryland.

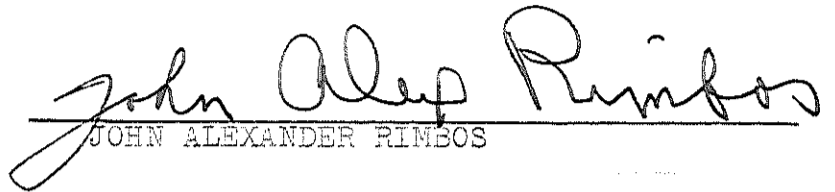
2. The complainant and the respondent were lawfully married on or about, to-wit, July 8, 1939, at Baltimore, Maryland.

3. Complainant avers that the said respondent voluntarily abandoned the bed and board of your complainant for more than one year next 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.

4. There was born to the Complainant and respondent during this marriage, two children, namely, Patricia A. Rimbos, age 13 years, girl, and Peter A. Rimbos, age 15 years, boy, who are now in the care, custody and control of the respondent.

The premises considered, your complainant makes the said Margaret Rimbos party respondent to this Bill of Complaint and in order that complainant may have the relief herein prayed for, may it please the Court to cause the respondent to appear and plead, answer or demur to this Bill of Complaint within the time prescribed by law and under the rules and practices of this Court; that the Court will see fit to grant him an absolute divorce from the bonds of matrimony with the respondent, and granting both the complainant and the respondent the right to remarry, and that your Honor will grant the respondent the care, custody and control of said minor children of

the parties; that your Honor will allow the complainant to see and visit said minor children at all reasonable times; that your Honor will grant such other, further and different relief as unto your Honor may seem just, fit and proper in the premises.


JOHN ALEXANDER RIMBOS

James R. Owen,
Solicitor for Complainant.

FILED

JAN 18 1960

ALICE J. DUCK, Register

John Alexander Rimboe's Complainant
No. Vs. Margaret Rimboe's Defendant

IN THE CIRCUIT COURT OF
MOBILE COUNTY, ALABAMA
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 Juanita Franklin, may take the testimony in this cause without the issuance of a commission.

Margaret M. Rimboe
Margaret Defendant Rimboe's

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

John Alex Rimboe
John Alexander Complainant Rimboe's

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

WITNESSES:

[Signature]
Mrs. Bernard Schoch

Margaret M. Rimboe
Margaret Rimboe's

John Alex Rimboe
John Alexander Rimboe's

FILED

JAN 18 1960

ALICE J. DUCK, Register

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STATE OF _____
COUNTY OF _____

I, _____, a NOTARY PUBLIC in and for said State and County, do hereby certify that _____, 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, _____ executed the same voluntarily on the day same bears date.

Witness my hand and seal this _____ day of _____, 19_____.

NOTARY PUBLIC

Filed _____
Register

STATE OF _____
COUNTY OF _____

No. _____

JOHN ALEXANDER RIMBOS

Vs.

MARGARET RIMBOS

ANSWER AND WAIVER

Filed, **FILED**, 19 _____

JAN 18 1960

ALICE J. DUCK, Register
