

BOBBIE LEE TATE,
Complainant,

-vs-

JOYCE DOROTHY TATE,
Respondent.

0 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 in the above styled cause and shows unto this Honorable Court as follows:

ONE

Complainant is the husband of the Respondent and they were married to each other on August 17, 1952 in St. Bernard Parish, La. Both the Complainant and the Respondent are each over the age of twenty-one years. The Complainant is a bona-fide resident citizen of Mobile County, State of Alabama and has been such for more than one year next preceding the filing of the bill of complaint herein. The Respondent is a resident of the State of Louisiana. There is one minor child as issue of their marriage, Ralph Bobby Lee Tate, age five years. Said child lives and resides with the Respondent.

TWO


The Respondent has voluntarily abandoned the bed and board of the Complainant for more than one year next preceding the filing of the bill of complaint herein.

PRAYER FOR PROCESS

Complainant prays that Your Honors will take jurisdiction of this cause, will make the said Joyce Dorothy Tate, party-respondent hereto, and will cause her 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 him 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 he may be due, and as in duty bound he will ever pray, etc.


SOLICITOR FOR COMPLAINANT.

BOBBIE LEE TATE

Complainant

No.

Vs.

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

JOYCE DOROTHY TATE

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 Mrs. Peggy Preston, may take the testimony in this cause without the issuance of a commission.

Joyce Dorothy Tate
Joyce Dorothy Tate Defendant

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

Bobbie Lee Tate
Complainant

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

BOBBIE LEE TATE, agrees that Joyce Dorothy Tate should be granted the custody and control of Ralph Bobby Lee Tate, subject to his right to see and visit with said child at all reasonable times.

Joyce Dorothy Tate releases Bobbie Lee Tate from all claims of alimony and support, both temporary and permanent.

Joyce Dorothy Tate
DEFENDANT. (Joyce Dorothy Tate)

ATTEST:

Mrs. J. M. Mullet
Mrs. J. M. Mullet

Bobbie Lee Tate
COMPLAINANT.

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 _____

STATE OF _____

Register _____

COUNTY OF _____