

4843

DIVORCE DECREE

MOORE PRINTING COMPANY - EAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

CARL N. WAINWRIGHT, Complainant

vs.

ALICE A. WAINWRIGHT, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confession~~ Waiver and Answer 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 CARL N. WAINWRIGHT is forever divorced from the said ALICE A. WAINWRIGHT for and on account of "VOLUNTARY ABANDONMENT"

It is futher 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 again marry except to each other during the pendency of said appeal.

It is futher 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 futher ordered that CARL N. WAINWRIGHT the Complainant pay the cost herein to be taxed, for which executed may issue.

This 9th day of February 1960

[Handwritten signature]

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. 4843 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

FEB 9 1960

Alice J. Duck, CLERK
REGISTER

CARL N. WAINWRIGHT

vs.

ALICE A. WAINWRIGHT

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, _____
Waiver and Answer, and Testimony of CARL N. WAINWRIGHT.

and in behalf of Defendant upon _____ Waiver and Answer.

Jeffrey J. Maddalena
Solicitor for Complainant.

Alice J. Luck
Register.

No. 4443

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

CARL N. WAINWRIGHT

vs.

ALICE A. WAINWRIGHT

NOTE OF TESTIMONY

Filed in Open Court this _____

day of _____, 194

FILED

FEB 9 1960

ALICE J. DUCK, Register Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: J. CONNOR OWENS, JR.

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

CARL N. WAINWRIGHT

a witness in behalf of CARL N. WAINWRIGHT in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein

CARL N. WAINWRIGHT

is the , Complainant
and

ALICE A. WAINWRIGHT

is the 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 9th day of February

, 1950

Alice J. Luck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

CARL N. WAINWRIGHT

Complainant

VS.

ALICE A. WAINWRIGHT

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

FILED

FEB 9 1960

ALICE J. DUCK, Register

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

CARL N. WAINWRIGHT

COMPLAINANT

vs.

ALICE A. WAINWRIGHT

RESPONDENT

I, J. CONNOR OWENS, JR.,

as Register and Commissioner

have called and caused to come before me CARL N. WAINWRIGHT

witness named in the requirement for Oral Examination, on the 9th day of February
19 60 , at the office of Telfair J. Mashburn
in Bay Minette , Alabama, and having first sworn said witness to speak the
truth, the whole truth, and nothing but the truth, the said Carl N. Wainwright

doth depose and say as follows: "My name is

Carl N. Wainwright. I am the complainant in this cause and I am over
the age of twenty-one years. I am a bona fide resident citizen of
Baldwin County, Alabama, living at Summerdale, where I was born and
have lived all my life. The respondent, ALICE A. WAINWRIGHT, is
over the age of nineteen years, and is a bona fide resident citizen
of Alabama, residing at 57 B Craftmore Drive, Prichard, Alabama. The
respondent and I were married at Summerdale, Alabama, on the 21st day
of September, 1956. My wife was just too young for marriage and left
me on several occasions. Finally, on the 14th day of December, 1958,
she left our home in Summerdale voluntarily, and since that time, she
has never returned to live with me as my wife, nor have we in any way
recognized each other as husband and wife. I did nothing to cause my
wife to act as she has." Further deponent says not.

Carl N. Wainwright

FILED

FEB 9 1960

ALICE J. DUCK, Register

.....CARL N. WAINWRIGHT
Complainant,
VS.
.....ALICE A. WAINWRIGHT
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from
Bay Minette....., in the County of Baldwin.....

Alabama, the place of trial of said cause, to-wit: ~~XXXXXX~~ CARL N. WAINWRIGHT.....

2. That said complainant requires an oral examination of said witnesses before a commissioner appointed by the Register of this Court.

Felicia J. Madhavi
Solicitor for Complainant.

NOTE:

Complainant suggests the name of J. Connor Owens, Jr.,

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Felicia J. Madhavi
Solicitor for Complainant.

FILED

FEB 9 1960

ALICE J. DUCK, Register

4843

BT-6-40-560

DEMAND FOR ORAL EXAMINATION.

.....CARL N. WAINWRIGHT.....

Complainant,

Vs.

.....ALICE A. WAINWRIGHT.....

Respondent.

IN THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA—IN EQUITY.

Filed this day of

194.....

FEB 9 1986

FILED

Register.

CARL N. WAINWRIGHT,
Complainant,

VS.

ALICE A. WAINWRIGHT,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. _____

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

Your complainant, CARL N. WAINWRIGHT, respectfully represents and shows unto your Honor as follows:

1. That complainant is over the age of twenty-one years and is a bona fide resident citizen of Baldwin County, Alabama, and has been for more than one year next preceding the filing of this bill of complaint; that ALICE A. WAINWRIGHT is over the age of ~~twenty~~ ^{NINETEEN} years and resides in Mobile County, Alabama;

2. That your complainant and the respondent were lawfully married on or about, to-wit: the 21st day of September, 1956, at Summerdale, Alabama;

3. That on or about, to-wit: the 14th day of December, 1958, the respondent voluntarily abandoned the bed and board of complainant, since which time complainant and respondent have not lived together nor in any way recognized each other as husband and wife; that such abandonment was without cause, fault, or consent on the part of complainant.

THE PREMISES CONSIDERED, your complainant makes the said ALICE A. WAINWRIGHT a party respondent to this bill of complaint, and in order that complainant may have the relief hereinafter prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said ALICE A. WAINWRIGHT, commanding her to plead, answer or demur to this bill of complaint within the time required by law; and complainant further prays that, on a final hearing of this cause, your Honor will enter a decree divorcing your complainant from said respondent; and that your Honor will grant such other, further, different or general relief as unto your Honor may seem just and proper in the premises, and your complainant will ever pray, etc.

FILED

FEB 9 1960

ALICE J. DUCK, Register

J. J. A. Marshall
SOLICITOR FOR COMPLAINANT.

CARL N. WAINWRIGHT,
Complainant,
VS.
ALICE A. WAINWRIGHT,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

WAIVER AND ANSWER

Comes the respondent in the above styled cause and accepts service of the bill of complaint in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross the same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree at any time, without further notice to her.

And for answer to the bill of complaint in said cause, respondent says:

1. She admits the allegations contained in paragraph 1 of said bill of complaint.
2. She admits the allegations contained in paragraph 2 of said bill of complaint.
3. She denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof of the same.

Mystee Henderson

Alice A. Wainwright
RESPONDENT.

FILED

FEB 9 1960

ALICE J. DUCK, Register