

4856

NELLIE PATRICIA WARREN,
Complainant,

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

-vs-

DYER WARREN,

()

Respondent.

NO. _____

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

Comes the Complainant and shows unto Your Honors and unto
this Honorable Court as follows:

ONE

Complainant is the wife of the Respondent and they were
married to each other on August 10, 1956 in Columbus, Mississippi.
The Complainant is eighteen years of age and the Respondent is
over the age of twenty-one years. The Complainant is a bona-fide
resident citizen of Mobile County, 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
Texas. There are no children as issue of their marriage

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 Dyer Warren, party-respondent
hereto, and will cause him 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 her 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 she may be due, and as in duty bound she will ever pray, etc.

FILED

FEB 18 1960

ALICE J. DUCK, Register

William L. Taylor
SOLICITOR FOR COMPLAINANT.

No. Vs.
NELLIE PATRICIA WARREN Complainant
DYER WARREN Defendant

IN THE CIRCUIT COURT OF
BALDWIN
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 Mrs. Peggy Preston , may take the testimony in this cause without the issuance of a commission.

X Dyer Warren Jr
Defendant

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

Nellie Patricia Warren
Complainant

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

Complainant releases the Defendant from all claims of alimony and support, both temporary and permanent.

Complainant agrees to pay all Court costs and attorneys fees incident to these proceedings.

Nellie Patricia Warren
COMPLAINANT.

X Dyer Warren Jr
DEFENDANT.

STATE OF TEXAS

COUNTY OF Harris

I, Charles A. Waller, a NOTARY PUBLIC in and for said State and County, do hereby certify that Dyer Warren, 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, he executed the same voluntarily on the day same bears date.

Witness my hand and seal this 29th day of Feb., 19 60.

Charles A. Waller
NOTARY PUBLIC

Filed STATE OF TEXAS

 Register COUNTY OF Harris

