

The State of Alabama, BALDWIN County

CIRCUIT COURT, IN EQUITY

VERBIE T. THOMAS Complainant

vs.

LETHA F. THOMAS Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on ANSWER AND WAIVER 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 VERBIE T. THOMAS is forever divorced from the said LETHA F. THOMAS

for and on account of VOLUNTARY ABANDONMENT

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED THAT THE FULL AND COMPLETE CUSTODY AND CONTROL OF WILLIE RAY THOMAS, LULA BELLE THOMAS, LORRAINE THOMAS, AND HAZEL THOMAS, THE MINOR CHILDREN OF THE PARTIES, IS HEREBY AWARDED TO THE COMPLAINANT.

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

It is further ordered that VERBIE T. THOMAS

be, and he is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that VERBIE T. THOMAS

the COMPLAINANT pay the cost herein to be taxed, for which execution may issue.

This 31 day of MARCH, 19 60

[Signature]

Judge Circuit Court, in Equity.

I, ALICE DUCK, Register

of the Circuit Court for 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, and the cost has been paid.

Witness my hand and seal this the \_\_\_\_\_ day of

MARCH, 19 60

Register of Circuit Court, in Equity.

*m*

No. \_\_\_\_\_ Page \_\_\_\_\_

**The State of Alabama**

COUNTY \_\_\_\_\_

**IN CIRCUIT COURT,  
IN EQUITY**

vs. Complainant,

Respondent.

**DIVORCE DECREE**

FILED  
MAR 27 1961  
ALICE J. DICK, CLERK

*[Faint, mostly illegible text from the reverse side of the document, including what appears to be a signature and possibly a date.]*

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

}

Circuit Court

TO: RUTH K. HOWELL

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 Verbie T. Thomas

a witness in behalf of Complainant in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Verbie T. Thomas is

and Letha F. Thomas is

, Complainant

Respondent

on oath, to be by you administered, upon him  
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 31 day of March

, 1960.

*Alice J. Clark*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

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THE STATE OF ALABAMA  
Baldwin County

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CIRCUIT COURT

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VERBIE T. THOMAS

Complainant

VS.

LETHA F. THOMAS

Defendant

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COMMISSION TO TAKE DEPOSITION

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COMMISSIONER:

FID  
MAR 21 1960

ALICE

WITNESSES:

The State of Alabama, BALDWIN County

IN CIRCUIT COURT, IN EQUITY

VERBIE T. THOMAS Complainant

vs.

LETHA F. THOMAS Defendant

Oral examination before the Register of the following witnesses:

VERBIE T. THOMAS

who reside in Alabama, said examination being conducted in BAY MINETTE Alabama,

on this the day of MARCH, and there being present

VERBIE T. THOMAS, ALICE DUCK, REGISTER IN CHANCERY, AND WILSON HAYES, ASSOCIATE SOLICITOR FOR COMPLAINANT.

The said WITNESS being first sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

TESTIMONY OF VERBIE T. THOMAS:

My name is Verbie T. Thomas and I live in Century, Florida, just across the Alabama line. I am 52 years old. My wife's name is Letha F. Thomas, She lives here at Bay Minette, Alabama and is 30 years old.

She and I were married in Evergreen, Alabama April 5, 1946. Since our marriage, we have had 4 children. The oldest is Willie Ray Thomas, who is 12. The next child's name is Lula Belle Thomas who is 10 years old. The next child's name is Lorraine Thomas who is 9 years old. Our youngest child's name is Hazel Thomas and she is 8 years old.

My wife and I were living in Century, Florida back in February of 1958 with all our children. On the 8th day of February, 1958, she told me that she was going to Flomaton, Alabama, just across the Florida line, to get some groceries. She left the house and did not come back. It was on Saturday morning. She left me with all four children and did not come back. She hasn't been back home since. I heard that she met a man and went with him to Mobile, but don't know that to be a fact. All I know is that we have not lived together as man and wife since the 8th day of February,

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**The State of Alabama,**

\_\_\_\_\_ COUNTY

**IN CIRCUIT COURT, IN EQUITY**

\_\_\_\_\_ vs. Complainant,

\_\_\_\_\_ Defendant.

**Deposition Taken Before  
Register on Oral Examination**

Deposition of \_\_\_\_\_

for \_\_\_\_\_

Filed \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

Published by order of the Court, \_\_\_\_\_

day \_\_\_\_\_, 19\_\_\_\_  
**FILED**

MAR 31 1960

\_\_\_\_\_ ALICE J. DUCK, Register  
\_\_\_\_\_ Register.

THE STATE OF ALABAMA, <sup>Baldwin</sup> ~~ESCAMBA~~ COUNTY

IN CIRCUIT COURT, IN EQUITY

No. ....

VERBIE T. THOMAS Complainant

vs.

LETHA F. THOMAS

Respondent

IN THIS CAUSE comes the COMPLAINANT  
by HIS Solicitor and submits the same for FINAL  
decree upon the Original Bill and exhibits thereto AND ANSWER AND WAIVER  
and upon the following testimony, to witt:

VERBIE T. THOMAS

*Wm Ray Stok*  
Solicitor for Complainant.

I Hereby Certify that the above note or testimony is correct:

This ..... day of ....., 19.....

*Alice J. Husk*, Register.

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**The State of Alabama**

ESCAMBIA COUNTY

**CIRCUIT COURT, IN EQUITY**

vs. Complainant,

Respondent.

**NOTE OF TESTIMONY**

Filed **FILED** \_\_\_\_\_, 19\_\_\_\_\_

MAR 31 1960

ALICE J. DUCK, Register.

Recorded in \_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

\_\_\_\_\_, Register.

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STATE OF ALABAMA        §  
 BALDWIN COUNTY         §  
 VERBIE T. THOMAS,       §  
                   COMPLAINANT,     §            IN THE CIRCUIT COURT OF  
 VS.                     §            BALDWIN COUNTY, ALABAMA.  
 LETHA F. THOMAS,        §            IN EQUITY.  
 RESPONDENT.             §            CASE NO. \*\* 4886

TO THE HONORABLE HUBERT HALL, Judge of the Circuit Court of  
 Baldwin County, Alabama, In Equity Sitting:

Your Complainant, Verbie T. Thomas, respectfully represents unto  
 Your Honor as follows;

1. That your Complainant is a bona fide resident citizen of the  
 Town of Century, State of Florida, and that he is of the age of fifty-  
 two (52) years; the Respondent, Letha F. Thomas, is a bona fide resident  
 citizen of the City of Bay Minette, Alabama, and she is of the age of  
 thirty (30) years.

2. That your Complainant and Respondent were married in the Town  
 of Evergreen, State of Alabama on the 5<sup>th</sup> day of April, 1946, and during  
 the course of their matrimony and as a result of that union four (4)  
 children have been born unto your Complainant and Respondent, namely,  
 Willie Ray Thomas, twelve (12) years of age, Lula Belle Thomas, ten (10)  
 years of age, Lorraine Thomas, nine (9) years of age, and Hazel Thomas,  
 eight (8) years of age.

3. That Your Respondent voluntarily abandoned Your Complainant's  
 bed and board for more than one year next preceding the filing of this  
 his Bill of Complaint.

4. Your Complainant further avers that since the aforementioned  
 abandonment, he has had the full and complete custody and control of the  
 said minor children; that he has rendered the proper control over the  
 said minor children that is necessary for their good health, welfare, and  
 well-being; that your Complainant lives a good and morally clean life  
 and is capable of rearing the minor children in a manner necessary for  
 their well-being.

WHEREFORE THE PREMISES CONSIDERED, Your Complainant prays as follows,  
 to-wit:

(A) That Your Honor will take jurisdiction of this Bill of Complaint and that the said Letha F. Thomas be made a party Respondent to this Bill of Complaint, by appropriate process, in the manner required by law and the rules of this Honorable Court;

(B) That Letha F. Thomas be required to answer, plead or demur to this Bill of Complaint within the time required by law and the rules of this Honorable Court;

(C) That the bonds of matrimony presently existing between the Complainant and Respondent be forever dissolved, and the Complainant be granted the right to again contract marriage within the time prescribed by law, if he so desires;


(D) That upon the final hearing of this cause, direct, decree and award the full and complete custody and control of Willie Ray Thomas, Lula Belle Thomas, Lorraine Thomas, and Hazel Thomas to the Complainant, Verbie T. Thomas.

(E) That Your Complainant be granted all such other, further and different relief to which he may be entitled under the pleadings and proof, and that he be granted general relief.

FILED

MAR 31 1960

ALICE J. DUCK, Register

  
WM. ROY STOKES  
SOLICITOR FOR COMPLAINANT

ANSWER AND WAIVER OF DEFENDANT.

The State of Alabama, BALDWIN County

CIRCUIT COURT, IN EQUITY

At BAY MINETTE, ALABAMA

VERBIE T. THOMAS

vs.

LETHA F. THOMAS

Comes LETHA F. THOMAS

the person named as defendant in this cause, and for answer to the bill herein denies each and every allegation therein, and demands strict proof of the same. Defendant also waives service by the Sheriff of subpoena on said bill, a copy of the interrogatories filed in the cause, notice of the filing of them, waives the ten days allowed by law to cross them, the right to cross them, and consents that testimony may be taken, and the cause be submitted to the Judge for final decree without notice to this defendant.

X Letha F. Thomas, Defendant.

THE STATE OF ALABAMA, BALDWIN COUNTY.

Before me T. C. Hand, Notary Public State at Large

the undersigned authority in and for said State and County, hereby certify that

LETHA F. THOMAS

whose name is signed to the foregoing

answer to a certain Bill of Complaint filed on the \_\_\_\_\_ day of MARCH, A. D., 1960,

wherein VERBIE T. THOMAS is complainant

and LETHA F. THOMAS is defendant,

and who is known to me to be the identical person named as defendant in the Bill of Complaint in this cause acknowledged before me on this day that being informed of the allegations on the Bill of Complaint filed against the defendant in said cause, said defendant signed the answer hereto attached voluntarily on the day same bears date.

And I further certify that defendant signed the said answer in my presence.

Given under my hand and seal this 22 day of MARCH, A. D., 1960.

FILED

MAR 31 1960

ALICE J. DUCK, Register  
MY COMMISSION AS A NOTARY PUBLIC  
EXPIRES 8th OF FEBRUARY, 1964

X Letha F. Thomas  
T. C. Hand  
NOTARY PUBLIC

Copy

FILED

consolidated to state of

YVONNE K. HINDS

The State of Alabama

COUNTY.

CIRCUIT COURT, IN EQUITY

vs.

Answer and Waiver of Defendant

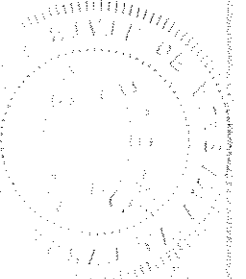
VERIFIED BY AFFIDAVIT

Filed this **FILED** day of

MAR 31 1960

ALICE J. DUCK, Register, 19

Register.



STATE OF ALABAMA

YVONNE K. HINDS

1960

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

VERBIE T. THOMAS

COMPLAINANT

vs.

LETHA F. THOMAS

RESPONDENT

I, RUTH K. HOWELL

as Register and Commissioner

have called and caused to come before me VERBIE T. THOMAS

witness named in the requirement for Oral Examination, on the day of

19 , at the office of

in BAY MINETTE , Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said VERBIE T. THOMAS

doth depose and say as follows:

My name is Verbie T. Thomas and I live in Century, Florida, just across the Alabama line. I am 52 years old. My wife's name is Letha F. Thomas. She lives here at Bay Minette, Alabama and is 30 years old.

She and I were married in Evergreen, Alabama April 5, 1946. Since our marriage, we have had 4 children. The oldest is Willie Ray Thomas, who is 12. The next child's name is Lula Belle Thomas who is 10 years old. The next child's name is Lorraine Thomas who is 9 years old. Our youngest child's name is Hazel Thomas and she is 6 years old.

My wife and I were living in Century, Florida back in February of 1958 with all our children. On the 8th day of February, 1958, she told me that she was going to Flomaton, Ala., just across the Florida line, to get some groceries. She left the house and did not come back. It was on Saturday morning. She left me with all four children and did not come back. She hasn't been back home since. I heard that she met a man and went with him to Mobile, but don't know that to be a fact. All I know is that we have not lived together as man and wife since the 8th day of February, 1958. I did not even hear from her, or of her until September of 1959. At that time she was at McKenzie, Alabama at her Step-father's house. In the month of September or October, 1959, she moved to Bay Minette, Alabama where she lived with her aunt and ~~she~~ ever since.

After my wife left me with the four children, I had to hire a maid to come in and take care of them while I was working. I paid her \$12.00 per week to come in and do the washing, cooking, and ironing for me and the children. I have done as well as I could do under the circumstances to rear my children. I love them, and I am going to educate them to the very best of my ability. I am trying to teach them the right way to live, and am trying to show them how to live a good clean christian life. It has been difficult

ORAL EXAMINATION

I, RUTH K. HOWELL 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

day of

, 19

*Ruth K. Howell* (L. S.)

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THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

Filed \_\_\_\_\_, 19

, Register.

RECORDED IN

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, Register.

THE STATE OF ALABAMA  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

COMPLAINANT

vs.

RESPONDENT

I, \_\_\_\_\_  
as Register and Commissioner  
have called and caused to come before me

witness \_\_\_\_\_ named in the requirement for Oral Examination, on the \_\_\_\_\_ day of \_\_\_\_\_  
19\_\_\_\_, at the office of \_\_\_\_\_  
in \_\_\_\_\_, Alabama, and having first sworn said witness \_\_\_\_\_ to speak the  
truth, the whole truth, and nothing but the truth, the said

doth depose and say as follows:

since I had no female in my home to help me, but it is my intention to keep my children and rear them to the very best of my ability.

As I said before, my wife has been gone over two years. She had a good place to live, and I had a good job. She had no reason to leave me and the children the way she did. I have not lived with her since February 8, 1958, and I don't ever intend to live with her again, therefore I have filed this suit for my divorce.

Velvie J. Thomanar

ORAL EXAMINATION

I, \_\_\_\_\_ 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 \_\_\_\_\_ and \_\_\_\_\_ 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 \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_.

\_\_\_\_\_  
(L. S.)

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THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

FILED

Filed \_\_\_\_\_, 19 \_\_\_\_\_

MAR 31 1960

ALICE J. DUCK, Register, \_\_\_\_\_, Register.

RECORDED IN

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\_\_\_\_\_, Register.