

(2942)

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ALMA LAURIE MOSS

, Complainant

vs.

T. M. MOSS

, 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 ALMA LAURIE MOSS is forever divorced from the said T. M. MOSS for and on account of Abandonment

It is further ordered, adjudged and decreed that care, custody and control of the minor child, Kathleen Moss, shall be in the Complainant, Alma Laurie Moss, with reasonable right of visitation to the Respondent and that the Respondent pay to the Complainant the sum of \$50.00 per month as and for support and maintenance of said minor child.

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 the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that ALMA LAURIE MOSS the Complainant pay the cost herein to be taxed, for which execution may issue.

This 8th day of January, 1953.

Jeffrey J. Maddux, 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. _____ Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

1-8-15

ALICE L. BECK, Register

AIMA LAURIE MOSS,

Complainant

-vs-

T. M. MOSS,

Respondent

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

TO THE HONORABLE TELFAIR J. HASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, Sitting in Equity:

Your Complainant, AIMA LAURIE MOSS, respectfully represents and shows unto your Honor:-

1. That your Complainant is over the age of twenty-one years and is a bona fide resident of said State and County, having been such a resident for more than one year next preceeding the filing of this Bill of Complaint; that T. M. MOSS is over the age of twenty-one years and is a bona fide resident of said State and County for over one year.

2. That your Complainant and the Respondent were lawfully married on, to-wit, April 16, 1937.

3. The Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceeding the filing of this Bill of Complaint, since which time Complainant and Respondent have not lived together as man and wife nor recognized each other as such.

4. Complainant further avers that there was one child born of this marriage, namely, Kathleen Moss, who will be nine years of age on January 21, 1953, and shows unto the Court that the Respondent is an able-bodied man gainfully employed and financially able to pay the sum of Fifty Dollars (\$50.00) per month for the support and maintenance of this minor child who is in the care, custody and control of the Complainant.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your Complainant prays that T. M. MOSS be made a party defendant to this cause by the usual process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the statutes in such cases made and provided; that upon a final

hearing of this cause, that your Complainant be granted a divorce from the Respondent and that she be granted the care, custody and control of the minor child of this marriage, namely, Kathleen Moss, with rights of visitation to the Respondent, and that she be awarded the sum of Fifty Dollars (\$50.00) per month for the support and maintenance of said minor child. Should your Complainant be mistaken in the relief prayed for, that there be granted to her such other, different and general relief to which she may be entitled and as in duty bound, she will ever pray.


Solicitor for Complainant

CECIL G. CHASON

ATTORNEY AT LAW
FOLEY, ALABAMA

January 5, 1952

Mrs. Alice J. Duck, Register
Bay Minette, Alabama

Dear Mrs. Duck:

Enclosed herewith is Bill of Complaint and Answer and
waiver in the divorce action of ~~Alma Laurie Moss -vs-~~
T. M. Moss.

Very truly yours,


C. G. Chason

CGC:fm

encl. 1

ALMA LAURIE MOSS,

Complainant

- vs -

T. M. MOSS,

Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the Respondent in the above-styled cause and accepts service of a Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the case submitted for final decree.


And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

1. He admits the allegations contained in Paragraph 1 of said Bill of Complaint.
2. He admits the allegations contained in Paragraph 2 of said Bill of Complaint.
3. He denies each and every allegation contained in Paragraph 3 of said Bill of Complaint and demands strict proof thereof.
4. He admits the allegations contained in Paragraph 4 of said Bill of Complaint.


Respondent

Sworn to and subscribed before me, a Notary Public, on this the

3rd day of January, 1952.


Notary Public, Baldwin County
State of Alabama

2942 RECORDED

FILED

1-6-52

ALICE J. RUCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Frances Malloy

KNOW YE: that we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine

Abner Lammie Moss

as witnesses in behalf of _____ in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Lizzie Anna Gordon

_____, Complainant
and Thomas

_____, 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 5th day of June, 1953

Asing J. ...
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mass

Complainant—

vs.

Mass

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

ALMA LAURIE MOSS

Complainant

VS.

T. M. MOSS

Respondent

I, Frances G. Mallory

as Register and Commissioner in Chancery

have called and caused to come before me Alma Laurie Moss and Lizzie Alma Gordon

witnesses named in the Requirement for Oral Examination, on the 5th day of January
1945, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said Witness es to speak the
truth, the whole truth, and nothing but the truth, the said Alma Laurie Moss and
Lizzie Alma Gordon doth depose and say as follows:

My name is Alma Laurie Moss. I am over the age of 21 years and a bona fide resident citizen of Foley, Baldwin County, Alabama, having been such a resident citizen for approximately 20 years. I married T. M. Moss on April 16, 1937, and we lived together as husband and wife until approximately a year and a half ago. At that time, and more than one year prior to the filing of my Bill of Complaint for divorce, T. M. Moss voluntarily and with no cause abandoned my bed and board and we have not lived together as man and wife nor recognized each other as such since that time. There was born of this marriage one child, Kathleen Moss, who will be 9 years of age on January 21, 1953. T. M. Moss is an able bodied man, gainfully employed and is financially able to pay the sum of \$50.00 per month for the support and maintenance of this minor child, who is in my care, custody and control and who has remained in my care, custody and control since my abandonment. I desire to have the Court place custody and control of this minor child in me with reasonable right of visitation to the Respondent.

Alma Laurie Moss

My name is Lizzie Alma Gordon. I am over the age of twenty-one years and a resident of Foley, Alabama, having resided in Foley for over ten years. I am personally acquainted with Alma Laurie Moss and T. M. Moss. Both are bona-fide resident citizens of Baldwin County, Alabama, and have been such resident citizens for over ten years. They were married on April 16, 1937, and lived together as man and wife in this County until approximately 1 1/2 to 1 1/2 years ago, at which time T. M. Moss voluntarily abandoned the bed and board of Alma Laurie Moss and with no cause, since which time they have not lived together as man and wife, nor recognized each other as such. They have one child of this marriage, Kathleen Moss, age 9 years, who has been and is in the care, custody and control of her mother, Alma Laurie Moss. T. M. Moss is financially able to pay the sum of Fifty Dollars (\$50.00) per month for the support and maintenance of this minor child.

Lizzie Alma Gordon

ORAL EXAMINATION.

I, Frances G. Mallory, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness _____ and read over to her and she signed the same in the presence of myself and C. G. Chason

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proom 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 5th day of January, 1945

Frances G. Mallory (L. S.)

NO _____	PAGE _____
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY.	
ALMA LAURIE MOSS	
P. M. MOSS	vs. Complainant
Respondent.	
Oral Deposition	
Filed <u>Jan 8</u> , 194 <u>5</u>	Record
Recorded in _____	Vol. _____
_____ Register.	Page _____

ALMA LAURIE MOSS

vs.

T. M. MOSS

THE STATE OF ALABAMA
 Baldwin County
 IN EQUITY
 Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____
 and testimony of Alma Laurie Moss and Lizzie Alma Gordon

and in behalf of Defendant upon Answer and Waiver

Thasau
 Solicitor for Complainant

W. J. [unclear]

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

ALMA LAURIE MOSS

vs.

T. H. MOSS

27912

NOTE OF TESTIMONY

Filed in Open Court this 8th

day of Jan, 1943

Wing J. ...
Register.