

(2983)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County  
CIRCUIT COURT, IN EQUITY

LOIS BREEDIN, Complainant

vs.

BOB BREEDIN, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Answer & 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 Lois Breedin is forever divorced from the said Bob Breedin for and on account of Cruelty

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 Lois Breedin the Complainant pay the cost herein to be taxed, for which execution may issue.

This 1st day of April, 1957

Hubert M. Hall  
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. 2983 Page \_\_\_\_\_

The State of Alabama  
Baldwin County

In Circuit Court, In Equity

LOIS FREEDIN

Complainant

vs.

BOB FREEDIN

Respondent

**DIVORCE DECREE**

**FILED**  
4-1-53  
ALICE J. DUCK, Register

LOSS BREEDIN

COMPLAINANT

VS

BOB BREEDIN

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Now comes the Respondent and accepted service of the summon and complaint in this cause.

The Respondent admits the allegations as to ages, marriage and residence but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

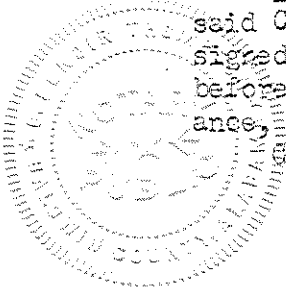
The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Bob Breedin

STATE OF ALABAMA  
BALDWIN COUNTY

I, L. M. Thompson, a Notary Public, in and for said County, in said State, hereby certify that Bob Breedin, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date. Given under my hand and seal on this the 24 day of March, 1953.

L. M. Thompson  
Notary Public, Baldwin County, Alabama.



RECORDED

LOIS BREEDIN

COMPLAINANT

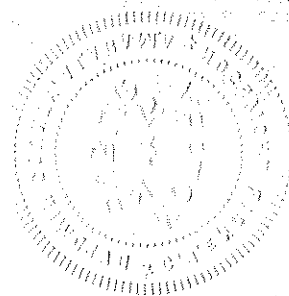
VS

BOB BREEDIN

RESPONDER

Answer & Waiver

From the Law Offices of  
C. LeNoir Thompson  
Bay Minette, Alabama



RECORDED

LOIS BREEDIN

COMPLAINANT

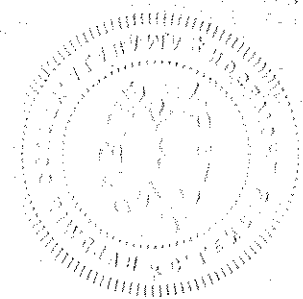
VS

IOB BREEDIN

RESPONDER

Answer & Waiver

From the Law Offices of  
C. LeNoir Thompson  
Bay Minette, Alabama



STATE OF ALABAMA  
BALDWIN COUNTY

You are hereby commanded to summon BOB EREEDIN, to appear and plead, answer or demur, within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in equity, by LOIS EREEDIN, as Complainant.

Witness my hand this 24 day of March, 1953.

Register

LOIS EREEDIN	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY
BOB EREEDIN	Ø	
RESPONDENT	Ø	

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

Your Complainant, Lois Ereedin, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and over the age of 18 years, and the Respondent is a bona fide resident of Baldwin County and over the age of 21 years.

2.

That your Complainant and the Respondent married in Lucedale, Mississippi, on June 22, 1952, and lived together as husband and wife until, on-to-wit, December 21, 1952, and that Baldwin County has been the home of the Complainant for more than two years the next preceding.

3.


Your Complainant avers and charges that the said Respondent did on or about the 15th day of December, 1952, and many times prior thereto assault, beat, hit and strike Complainant; that said Respondent has committed actual violence on her person attended with danger to her health or life; Complainant avers and charges that Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonable convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

4.

There was born as fruits of the first marriage between the Complainant and the Respondent one child, Debra Kay Breedin, age about 17 months; That the mother of said children is a suitable, fit and proper person to have the care, custody and control.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said BOB BREEDIN, party Respondent to this cause of action, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that your Honor will upon a final hearing hereof, award to her a decree of divorce forever barring the bonds of matrimony existing between your Complainant and the Respondent; that she be awarded the custody of the child, Debra Kay Breedin, that she be granted such other further, different or general relief as she may be in equity and good conscience to receive.

  
Solicitor for the Complainant

RECORDED

2983

LOIS BRUEDIN

COMPLAINANT

VS

ICE BRUEDIN

RESPONDENT

Bill of Complaint

FILED

3-24-59

ALICE J. RUCK, Register



COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Lyleene Nixon

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 Lois Breedin and Otis Minote

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

Lois Breedin

Complainant

and

Bob Breedin

Respondent

on oath, to be by you administered, upon Lois Breedin and Otis Minote to take and certify the deposition s of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 24<sup>th</sup> day of March, 1953

Richard J. Minato  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

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

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

LOIS BREEDIN

Complainant—

**vs.**

BOB BREEDIN

Defendant—

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER

WITNESSES:

LOIS BREEDIN

vs.

BOB BREEDIN

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, \_\_\_\_\_  
Answer & Waiver of Respondent and testimony of Lois Breedin and Otis Hinote

and in behalf of Defendant upon \_\_\_\_\_

*W. J. ...*  
Register.

*C. ...*

M

No. ....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

LOIS BREEDIN

vs.

JOE BREEDIN

**NOTE OF TESTIMONY**

Filed in Open Court this 24<sup>th</sup> .....

day of March, 1943

Wice J. Mene  
Register.

THE STATE OF ALABAMA  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

LOIS BREEDIN

Complainant

VS.

BOB BREEDIN

Respondent

I, Lyrleene Nixon

as Register and Commissioner

have called and caused to come before me Lois Breedin and Otis Hinote

witnesses named in the Requirement for Oral Examination, on the 24 day of March  
19453, at the office of C. LeMoire Thompson  
in Bay Minette, Alabama, and having first sworn said Witnesses to speak the  
truth, the whole truth, and nothing but the truth, the said Lois Breedin and Otis Hinote  
doth depose and say as follows:

That my name is Lois Breedin, I am over the age of 18 years and a bona fide resident of Baldwin County, Alabama, and the Respondent, Bob Breedin is over the age of 21 years and a bona fide resident of Baldwin County, Alabama, we were married the second time at Lucedale, Mississippi, on June 22, 1952, and resided as husband and wife in Loxley, Alabama, until our separation on or about December 15, 1952, the cause of the separation being cruelty on this occasion he struck me down and knock me down two different times putting me in fear of my life and health, I was forced to leave him, and have not lived with him as his wife since that day.

We had been married before to each other and from that marriage one child, Debra Kay Breedin, age about 17 months, was born, who has been in my constant care, custody, and control since birth and is now in my care, custody and control. I respectfully ask the court to grant me the full care, custody and control of this child. An agreement for a property settlement has been made, which I understand is part of this evidence.

Lois Breedin

That my name is Otis Hinote, I know both parties to this cause that they were married the second time on June 22, 1952 at Lucedale, Mississippi, there are no children as fruits of this marriage but there is a little girl, Debra Kay Breedin, born as fruits of the former marriage, I was present on or about the 15 day of December when the Respondent struck the Complainant knocking her down and abusing her so as she became in fear of her life and health that they have not lived together as husband and wife since this occasion. The Complainant has constantly looked after and cared for the little girl, Debra Kay, and I submit to the Court that she is fit and suitable to have the permanent care, custody, and control of the little girl.

Otis Hinote

**ORAL EXAMINATION.**

I, Lyrleene Nixon, 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 es and read over to them and they signed the same in the presence of myself and C. LeNoir Thompson

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom made before me of the identity of said witness es; 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 24 day of March, 1945

Lyrleene Nixon (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

LOTS REEDIN

vs. Complainant

BOB REEDIN

Respondent.

**Oral Deposition**

Filed 22 - 24, 1945

Wm. A. Tucker, Register.  
Recorded in \_\_\_\_\_

Record \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_  
\_\_\_\_\_, Register.

STATE OF ALABAMA

BALDWIN COUNTY

Be it hereby and hereinafter agreed between the parties to this agreement, which is entered into for the express purpose of making a property settlement between said parties whereby, Bob Breedin and Lois Breedin, agree to sell and convey a certain parcel of land; to-wit:

Lots 14 and 15, Block 7 of the Highway addition to the Town of Loxley, Alabama, as recorded in the plat book of the Office of the Judge of Probate of Bay Minette, Alabama.

AND THAT the proceeds from said sales are to be used as follows:

One Third (1/3) sum thereof to be paid to the said Lois Breedin, Two Thirds (2/3) of the sum thereof to be paid to the said Bob Breedin shall pay the remaining sum due as purchase money on said property to E. M. Boone, Seller, and in addition thereto the said Bob Breedin shall assume and pay the following named creditors:

Matthews Furniture Company and to pay attorney fees incurred in  
Baldwin Furniture Company Bay Minette, Alabama.  
Jacobs' Department Store and  
Bill's Grocery

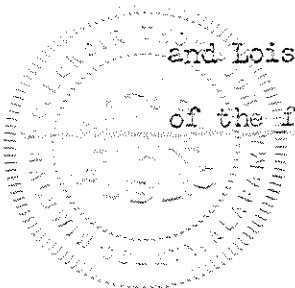
and that any other accounts which may have been occurred by the Lois Breedin are hereby assumed by the said Lois Breedin.

It is further provided that the parties hereto agree that the said Lois Breedin is a fit, suitable, and proper person to have the permanent care, custody, and control of the infant daughter, Debra Kay Breedin, and that the Circuit Court of Baldwin County shall have the continued supervision of said child.

Bob Breedin  
Lois Breedin

Before me the undersigned authority personally appeared Bob Breedin and Lois Breedin, who are known to me and who being informed of the contents of the foregoing agreement voluntarily executed same this 24th day of March, 1953.

C. J. Thompson  
Notary Public



**RECORDED**

2983

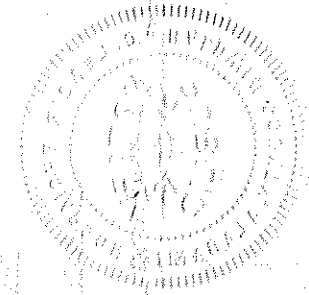
LOIS BREEDIN

COMPLAINANT

VS

JOE BREEDIN

RESPONDENT



**FILED**

3-24-53

ALICE J. DUCK, Register



LOIS BREEDIN

COMPLAINANT

VS

BOB BREEDIN

RESPONDENT

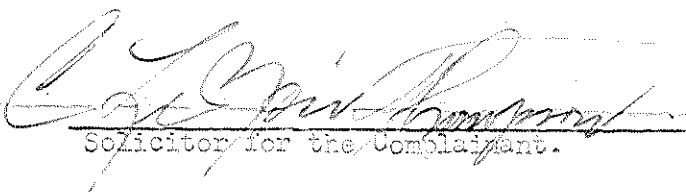
IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

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

Comes the Plaintiff in said cause and moves this Honorable Court to amend said decree rendered therein on the 1st day of April, 1953, by your Honor to conform to the testimony and agreement executed therein by the parties, so that said decree will show this Honorable Court to have granted care, custody and control of Debra Kay Breedin, minor daughter of the parties to this cause, said daughter age being about 17 months.

  
Solicitor for the Complainant.

STATE OF ALABAMA

BALDWIN COUNTY

Be it hereby and hereinafter agreed between the parties to this agreement, which is entered into for the express purpose of making a property settlement between said parties whereby, Bob Breedin and Lois Breedin agree to sell and convey a certain parcel of land; to-wit: 1

Lots 14 and 15, Block 7 of the Highway addition to the Town of Loxley, Alabama, as recorded in the plat book of the Office of the Judge of Probate of Bay Minette, Alabama.

AND THAT the proceeds from said sales are to be used as follows:

One Third (1/3) sum thereof to be paid to the said Lois Breedin, Two Thirds (2/3) of the sum thereof to be paid to the said Bob Breedin shall pay the remaining sum due as purchase money on said property to E. M. Boone, Seller, and in addition thereto the said Bob Breedin shall assume and pay the following named creditors:

Matthews Furniture Company  
Baldwin Furniture Company  
Jacobs' Department Store and  
Bills Grocery

and to pay attorney fees incurred in Bay Minette, Alabama.

and that any other accounts which may have been occurred by the Lois Breedin are hereby assumed by the said Lois Breedin.

It is further provided that the parties hereto agree that the said Lois Breedin is a fit, suitable, and proper person to have the permanent care, custody, and control of the infant daughter, Debra Kay Breedin, and that the Circuit Court of Baldwin County shall have the continued supervision of said child.

Bob Breedin  
Lois Breedin

Before me the undersigned authority personally appeared Bob Breedin and Lois Breedin, who are known to me and who being informed of the contents of the foregoing agreement voluntarily executed same this 3rd day of March, 1953.

W. D. Thompson  
Notary Public

RECEIVED in Special Office  
JANUARY 1953

Handwritten notes and signatures in the top left margin.

Handwritten notes and signatures in the top right margin.

Handwritten initials or numbers on the left side.

H 168.99

Received in Sheriff's Office  
this 1 day of May 1953  
TAYLOR WILKINS, Sheriff

Executed May 14, 1953  
By Serving copy on

Bob Breedin

Sheriff  
Taylor Wilkins  
By  
Edleigh Steadham

5-14-53  
2982  
file  
all

LOIS BREEDIN

COMPLAINT

RECORDED

file

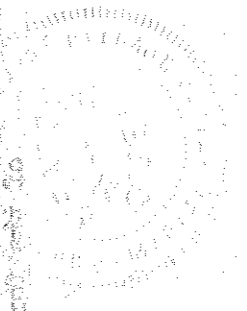
LOIS BREEDIN  
VS  
BOB BREEDIN  
The undersigned, Sheriff Taylor Wilkins, do hereby certify that the within and above account which has been furnished by the said Lois Breedin is a true and correct copy of the original as shown to me by the said Lois Breedin. I have compared the original with the copy and find them to be correct. I have also compared the original with the copy and find them to be correct. I have also compared the original with the copy and find them to be correct.

FILED  
MAY 14 1953  
SHERIFF'S OFFICE  
TAYLOR WILKINS

It is further provided that the within account shall be returned to the said Lois Breedin as a true and correct copy of the original as shown to me by the said Lois Breedin. I have compared the original with the copy and find them to be correct. I have also compared the original with the copy and find them to be correct. I have also compared the original with the copy and find them to be correct.

*[Handwritten signatures]*

and the Sheriff shall give the original to the said Lois Breedin as a true and correct copy of the original as shown to me by the said Lois Breedin. I have compared the original with the copy and find them to be correct. I have also compared the original with the copy and find them to be correct. I have also compared the original with the copy and find them to be correct.



*[Handwritten signature]*

LOIS BREEDIN,

COMPLAINANT,

VS

BOB BREEDIN,

RESPONDENT.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

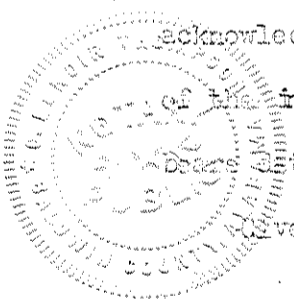
IN EQUITY.

Now comes the Respondent and accepts service of the copy of the  
~~petition by the Complainant to amend the decree in this cause, so as~~  
 to provide that the Complainant should have custody of the minor child,  
 fruit of the marriage of the parties to this cause. The Respondent  
 admits the allegations therein, and waives notice of the time of taking  
 testimony on behalf of the Complainant in said motion; the right to cross-  
 examine Complainant's witnesses and agrees that this motion may be sub-  
 mitted for final decree amended the said divorce decree without further  
 notice.

Bob Breedin

STATE OF Alabama  
 COUNTY OF Baldwin

I, [Signature] Notary Public, in and  
 for said County, in said State, hereby certify that Bob Breedin, whose  
 name is signed to the foregoing instrument, and who is known to me,  
 acknowledged before me on this day that, being informed of the contents  
 of the instrument, he executed the same voluntarily on the day the same  
 Date: \_\_\_\_\_



Given under my hand and seal on this the 18 day of Nov, 1953.

[Signature]  
 Notary Public, Baldwin County, Ala

LOIS BREEDIN,

Complainant,

vs.

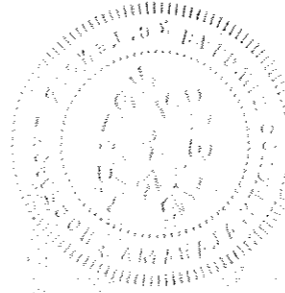
BOB BREEDIN,

Respondent.

RECORDED

ANSWER AND WAIVER

From the Law Office of  
C. LeNoir Thompson  
Attorney at Law



LOIS BREEDIN,

Complainant,

vs.

BOB BREEDIN,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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

Your complainant, Lois Breedin, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your complainant is a bona fide resident of Baldwin County, Alabama, and over the age of 16 years, and the respondent is a bona fide resident of Baldwin County and over the age of 21 years.

2.

That your complainant and the respondent married in Lucedale, Mississippi, on June 22, 1952, and lived together as husband and wife until, on, to-wit, December 21, 1952, and that Baldwin County has been the home of the complainant for more than two years the next preceding.

3.

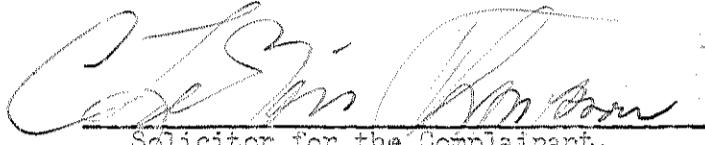
That on, to-wit, April 1, 1953, your complainant obtained a divorce by a decree of this Honorable Court from the respondent in this cause, and that through some error the custody of the child, Debra Kay Breedin, age about 17 months, was not adjudicated as set forth in the original petition.

4.

That testimony was taken to show that your complainant was a suitable, fit and proper person to have the care, custody and control of the said child, fruits of this marriage.

WHEREFORE, the premises considered, your complainant prays that your Honor will by proper process make the said Bob Breedin party respondent to this cause of action, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your complainant further prays that your Honor will upon a final hearing hereof amend the original decree of divorce granted by this Honorable Court and that your complainant will be awarded the care, custody and control of the said infant child, Debra Kay Breedin, and that she be granted such other, further or different relief as she may in equity and good conscience be entitled to receive.

  
Solicitor for the Complainant.

LOIS FREEDIN,

Complainant,

vs.

BOB FREEDIN,

RECORDED

Respondent.

PETITION

From the Law Office of  
G. LeNoir Thompson  
Attorney at Law



STATE OF ALABAMA

BALDWIN COUNTY

LOIS BREEDIN,

Complainant,

vs.

DOE BREEDIN,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA


IN EQUITY

This cause coming on to be heard was submitted upon Bill of Complaint, 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 this Court that the divorce granted by this Honorable Court heretofore be and the same is hereby amended to provide that the said Lois Breedin shall have the permanent care, custody and control of the infant daughter, Debra Kay Breedin.

It is further ordered that the complainant, Lois Breedin, pay the costs herein to be taxed, for which execution may issue.

This 19<sup>th</sup> day of November, 1953.

  
Hubert M. Hall  
Judge of the Circuit Court, in Equity.

M

LOIS FREEDIN,  
Complainant,  
vs.  
BOB FREEDIN,  
Respondent.

2983

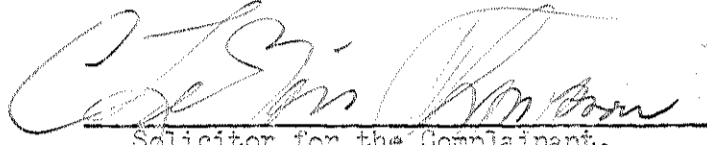
DECREE

FILED  
NOV 19 1953

ALICE L. BUCK, Register

From the Law Office of  
C. LeNoir Thompson  
Attorney at Law

Your complainant further prays that your Honor will upon a final hearing hereof amend the original decree of divorce granted by this Honorable Court and that your complainant will be awarded the care, custody and control of the said infant child, Debra Kay Breedin, and that she be granted such other, further or different relief as she may in equity and good conscience be entitled to receive.

  
Solicitor for the Complainant.

LOIS BREEDIN,

Complainant,

vs.

BOB BREEDIN,

RECORDED

Respondent.

PETITION

From the Law Office of  
C. LeNoir Thompson  
Attorney at Law