

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity.)

LILLIE B. GRAHAM

Complainant.

VS.

ALBERT B. GRAHAM

Respondent.

I T. W. Richerson,

as Register and Commissioner

have called and caused to come before me Lillie B. Graham, Mrs. J. W. Conway
and Mrs. A. V. Presley,

witnesses named in the Requirement for Oral Examination, on the 5th day of December,

1930, at the office of T. W. Richerson

in Bay Minette, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Lillie B. Graham

doth depose and say as follows:

My name is Lillie B. Graham and I am a resident of Bay Minette, Baldwin County, Alabama, twenty-one years of age. The Respondent, Albert B. Graham, is over twenty-one years of age and a resident of Enterprise, Coffee County, Alabama. The Respondent, Albert B. Graham, and I were married at Bonifay, Florida, on May 22, 1928. We lived together as husband and wife until on or about August 23, 1929. On August 23, 1929, and on various other dates the Defendant, Albert B. Graham, cursed, abused and threatened me. The Defendant began abusing me some short time after we were married and his conduct was such that on two occasions prior to August 23, 1929, I had to leave him for protection but each time I went back with him in an effort to bring about some reconciliation and that I might, if possible, continue to live with him. On August 23, 1929 his conduct was such that I was forced to leave him and knowing him as I do and knowing that he was a man of high temper, and he, at that time, abusing, cursing and threatening me, and his conduct was such that I had every reasonable apprehension to believe, and did, in fact, know that if I should continue to live with him he would carry out his threats and do actual violence to my person which would necessarily endanger my life and health. I, at no time while

we were living together, gave the Defendant any cause whatever for mistreating me. I learned, and in fact it was the general talk, that the cause of the Defendant's mistreating me as he did was whisky and other women. We were living in Baldwin County, Alabama, at the time I was forced to leave him.

Lillie B. Graham

MRS. J. W. CONWAY, A WITNESS FOR THE COMPLAINANT BEING DULY SWORN DEPOSES AND SAYS:

My name is Mrs. J. W. Conway, I am a resident of Bay Minette, Baldwin County. I am the mother of Lillie B. Graham, the Complainant in this cause. The Complainant and the Defendant were married in 1928 and they visited in my home and I visited in their home real often while they were living together as man and wife. I often heard the Respondent curse, abuse and threaten my daughter, the Complainant in this cause, and I know that on two occasions prior to the last time that my daughter left Albert B. Graham she was forced to leave him and come to me for protection. I know that Albert B. Graham was a man of high temper and from observation and from hearing him from time to time I know that it was impossible for my daughter to live with him, and that his conduct was such that I knew that if she continued to live with him he would carry out his threats and do actual violence to my daughter which would necessarily endanger her life and health. The Defendant drank liquor very heavily and in fact to an excess and every time when he came home under the influence of liquor he would abuse my daughter. They were living in Baldwin County Alabama at the time of the separation.

Mrs J W Conway

MRS. A. V. PRESLEY, A WITNESS FOR THE COMPLAINANT BEING DULY SWORN DEPOSES AND SAYS:

My name is Mrs. A. V. Presley. I live in Bay Minette, Baldwin County, Alabama. I am acquainted with Lillie B. Graham and Albert B. Graham, the Complainant and Defendant in the above cause. On one occasion while the Complainant and Defendant were visiting in

my home I heard the Defendant curse, abuse and threaten the Complainant. I have a number of times heard the Complainant and the Complainant's mother, complain of the way the Defendant was treating the Complainant. It was the general talk in the community where the Complainant and the Defendant lived that the Defendant drank strong liquor to excess and ran around with other women. The Defendant was a man of high temper. On one occasion when the Complainant was forced, on account of the threats and abuse of the Defendant, to leave him she came to my place and soon afterwards the Defendant came to my place and forced the Complainant, with his gun, to return with him. I know that on several occasions he abused and threatened the Complainant and knowing him as I do I have every reason to believe, and do believe that if she should have continued to live with him as his wife he would have, no doubt, carried out his threats and would have done actual violence to her which would have necessarily endangered her life and health.

Mrs. A. H. Presley

ORAL EXAMINATION.

I, T. W. Richerson, as Register and Commissioner hereby certify that the foregoing deposition S. on Oral Examination was taken down in writing by me in the words of the witness es and read over to them and they signed the same in the presense of myself and H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof 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 5th day of December, 1930 192

T. W. Richerson (L. S.)
Register

NO. 939 PAGE

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

Lewis B. Graham
vs. Albert B. Graham
Complainant

Respondent

Oral Deposition

Filed Dec 6th, 1930
T. W. Richerson, Register.
Recorded in

Vol. _____ Page _____
Record

Register

The State of Alabama, {
Baldwin County. No. ~~xxx~~ 939

Circuit Court, in Equity.

Lillie B. Graham Complainant.

vs.

Albert B. Graham Defendant.

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and upon consideration thereof, the Court is of 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 the Complainant is forever divorced from the Defendant.

.....on account of cruelty.....as alleged in said bill of complaint,

.....
.....
.....
.....

It further ordered; that the said Lillie B. Graham be, and She is hererby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Lillie B. Graham pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said

Albert B. Graham

It is further ordered, adjudged and decreed that said Lillie B. Graham shall not again marry except to said Albert B. Graham until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry again except to said Albert B. Graham

..... during the said pendency of appeal

...Dated at Chambers,.....

This 10th day of December, 1920
J. W. Hare
Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA, {
Baldwin County.

Circuit Court, in Equity.

I, Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the day of 192....., in the cause of

Complainant.....

vs.

Defendant.....

as appears of record in said Court.

Witness my hand and the seal of said Court, this the

day of 192.....

Register

Recorded

NO. 939

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY,
BALDWIN COUNTY, ALA.

Lillie B. Graham

vs.

Albert B. Graham

DECREE OF DIVORCE.

Filed in office this 11th

day of Dec, 1923

D. M. Richmond
Register.

E. O. M.

Dec 1930

8581 NOTE OF TESTIMONY

Lillie B. Graham

vs.

Albert B. Graham

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 waiver
service of summons on Defendant; answer of defendant, and
testimony of Lillie B. Graham, Mrs. J. W. Conway, and Mrs. A. V.
Presley

and in behalf of Defendant upon

J. W. Richman
Register.

No. 939

THE STATE OF ALABAMA
BALDWIN COUNTY

IN EQUITY,
CIRCUIT COURT OF BALDWIN COUNTY.

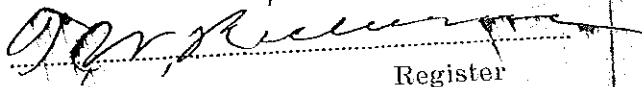
Lillie B. Graham

VS

Abert B. Graham

NOTE OF TESTIMONY

Filed in Open Court this 6th
day of December, 1930



Register

The State of Alabama, }
Baldwin County

Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama--GREETING:

WE COMMAND YOU, That you summon Albert B. Graham
Enterprise Ala.

of Baldwin

County, to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Sum-
mons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by
Lillie B. Graham,

against said

Albert B. Graham

and further to do and perform what said Judge shall order and direct in that behalf. And this the
said Defendant shall in no wise omit, under penalty, etc. And we further command that you return
this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, T. W. Richerson, Register of said Circuit Court, this 31st day of
October 1930 193

T. W. Richerson Register

N. B.--Any party defendant is entitled to a copy of the bill upon application to the Register.

SERVE ON

Circuit Court of Baldwin County
In Equity

No.

SUMMONS

Lillie B. Graham

vs.

Albert B. Graham

Esquire Coffee
do
Liverwell, Tex
mother Mrs. Annie
Graham & her
brother Victor Graham

Beebe & Hall.

Solicitor for Complainant

Recorded in Vol _____ Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

Received in office this

31

day of

October

1950

C. Drwin

Sheriff.

Executed this

26

day of

Nov

1950

by leaving a copy of the within Summons with

Albert B. Graham

Defendant.

O. H. Lightner

Sheriff.

By

J. H. Walker

Deputy Sheriff.

LILLIE B. GRAHAM,
Complainant,

vs

ALBERT B. GRAHAM,
Defendant.

(IN THE CIRCUIT COURT OF

(BALDWIN COUNTY, ALABAMA.

(IN EQUITY.

And now comes the Defendant, Albert B. Graham, and
waives notice of the time and place of taking Complainant's
testimony and the right to cross examine Complainant's witnesses.

Albert B. Graham

Lillie B Graham

is

Albert B Graham

Waiver

Filed this Dec 4th 1930

W. W. P. P. P.
Register

LILLIE B. GRAHAM,
COMPLAINANT,

-VS-

ALBERT B. GRAHAM,
DEFENDANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY,

ALABAMA
IN EQUITY

And now comes the Defendant, Albert B. Graham, and for answer to the Complainant's bill of complaint and to each count or paragraph thereof separately and severally, says:

He admits the allegations contained in paragraph FIRST, that the Complainant is a bona fide resident of Baldwin County, Alabama over the age of twenty-one years and that the respondent is over twenty-one years of age and a resident of Enterprise, Coffee County, Alabama.

He admits the allegations contained in paragraph SECOND that he and the complainant were married at Bonifay Florida on May 22, 1928.

He admits the allegations contained in paragraph THIRD, in that he and the complainant lived together as man and wife until on to-wit: August 23, 1929, but denies the allegation that the complainant was forced to quit living with the defendant.

He denies all the allegation contained in paragraph FOURTH, and especially that part wherein it is alleged that he cursed, abused and threatened the complainant, and demands strict proof thereof.

Albert B. Graham
Defendant

TO THE HONORABLE F. W. HART, JUDGE OF THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

Comes your Complainant Lillie B. Graham and humbly com-
plaining against Albert B. Graham respectfully represents and shows
unto your Honor as follows:

FIRST:

That she is a bona fide resident of Baldwin County, Alabama,
over twenty-one years of age; that the Defendant is, over the age of
twenty-one years and a resident of Enterprise, Coffee County, Alabama.

SECOND:

That your Complainant and the Defendant were married at
Bonifay, Florida, on May 30, 1928.

THIRD:

That your Complainant and the Defendant lived together as
husband and wife until on to-wit, August 25, 1929, when for reasons
hereinafter set out your Complainant was forced to abandon living
with the Defendant.

FOURTH:

That on to-wit, August 25, 1929, and various other dates
the Defendant cursed, abused and threatened your Complainant; that
his conduct was such as to cause your Complainant to have reasonable
apprehension to believe and that she did believe that if she should
continue to live with him he would carry out his threat and thereby
do actual violence to her person attended with danger to her life
and health; that your Complainant and the Defendant were living in
Baldwin County, Alabama, at the time of the separation.

Wherefore, the premises considered, your Complainant prays
that your Honor will by proper process make the Defendant, Albert B.
Graham, party Defendant 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 upon a final hearing of this cause your Honor will grant unto your Complainant a decree of absolute divorce forever barring the bonds of matrimony existing between her and the Defendant, Albert D. Graham; that your Honor will give and grant unto her such other, further, different and general relief as he may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Beebe & Space
SOLICITORS FOR COMPLAINANT.

FOOT NOTE:

~~The Defendant is required to answer every allegation of the foregoing paragraphs from first to fourth, both inclusive, but not under oath. Oath being hereby expressly waived.~~

Beebe & Space
SOLICITORS FOR COMPLAINANT.

8550 REQUEST FOR DECREE IN VACATION.

MOORE PTC CO.

STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. 939 Dec. 6 Term, 1930

Lillie B. Graham, Complainant...

vs.

Albert B. Graham, Defendant...

To T. W. Richerson, Register:

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Beebe & Hall

Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Beebe & Hall

Solicitor for Complainant.

No. 939 Page

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Lillie B. Graham

vs.

Albert B. Graham

REQUEST FOR DECREE IN
VACATION

FILED Dec. 6, 1930 192

T. W. Williams
Register

RECORDED IN RECORD

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