

TO HON. F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN CHANCERY:

Comes the complainant, ANGIE L. BRUNNER, and humbly complaining against JOHN F. BRUNNER, respectfully represents and shows unto your Honor as follows:

#### FIRST:

That she is a bona fide resident of Baldwin County, Alabama, and has been for more than one year next before the filing of this Bill of Complaint; that she is over twenty-one years of age.

### SECOND:

That the respondent, John F. Brunner, is over twentyone years of age, and a non-resident of the State of Alabama, his
post-office address being care of Middletown & Royalton Water Company, Harrisburg, Pennsylvania.

### THIRD:

That your complainant and respondent were married at Tallahassee, Florida, on February 19, 1929, and lived together as husband and wife in Baldwin County, Alabama, until, to-wit, April 1st, 1931.

### FOURTH:

That on, to-wit, April 1st, 1951, the respondent, John F. Brunner, voluntarily abandoned the bed and board of your complainant and has remained away voluntarily and continuously since that time.

prays that your Honor will by proper process make the said John F. Brunner party respondent to this Bill of Complaint, 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 give and grant unto her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the said respondent. Your complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

And as in duty bound she will ever pray.

Beale 4 Haco Solicitors for Complainant.

### FOOT NOTE:

The respondent is required to answer each and every ellegation contained in the foregoing Bill of Complaint in Paragraphs "FIRST" to "FOURTH" inclusive, but not under oath, oath being hereby expressly waived.

Solicitors for Complainant.

ANGLE L. DRUNNER,

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JOHN J. BRUNNIR

Filed this the 28th day of april, 1953

copy sent by rigistered mail.

ANGIE L. BRUNNER,	)				
Complainant,	) ]	IN THE	CIRCUIT	COURT O	F BALDWIN
vs.	j	COUNTY,	ALABAMA	• IN	CHANCERY.
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Respondent	į				

Comes the Respondent, John F. Brunner, and waives notice of the time of taking testimony on behalf of the complainant; the right to cross-examine witnesses of the complainant and all other notices required by law, and agrees that the cause may be submitted for final decree forthwith.

Respondent.

Witnesses:

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Tient July W. 1983 B. A. Stone Regole

ANGIE L. BRUNNER,

Complainant,

VS:

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN CHANCERY.

No.

JOHN F. BRUNNER,

Respondent.

Comes the Respondent, John F. Brunner, and denies each and every allegation contained in the Complainant's bill of complaint, and demands strict proof of the same.

Respondent.

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Filed July 78, 1933 M. a. Stone Register

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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.

Beele Dase

Solicitor for Complainant.

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Filed in office on this 3rd day of May 1923

BY REGISTERED MAIL.

Register.

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### The State of Alabama Baldwin County

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

		Angie L.	Brunner			COMPLAI:	NANT	
		*		VS.				
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in <u>Bay M</u>	inette	:	, Alabama, ar	nd having	first sworn	said witnes	ss <b>es</b> to s	speak the
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Angie	L. Br	ınner	manda a anala		ose and say		:	

My name is Angie L. Bruunet. I am a bona fide resident of Baldwin County, Alabama, and have been for more than one year next preceding the filing of the bill of complaint in this cause. I am over twenty-one years of age.

The respondent John F. Brunner is over twenty-one years of age, and a non-resident of the state of Alabama, his address being care Middletown & Royalton Water Company, Harrisburg, Pennsylmania.

The Respondent and Complainant were married at Tallahassee, Florida, on February 19th, 1929, and lived together as man and wife in Baldwin County, Alabama, until in April, 1931, that is on April 1st, 1931. That the respondent has remained away voluntarily and continuously since, to-wit: April, 1st, 1931.

That the respondent has not since, to-wit: April 1st, 193E, contributed anything toward the maintenance and support of the respondent.

angie I. Brunned

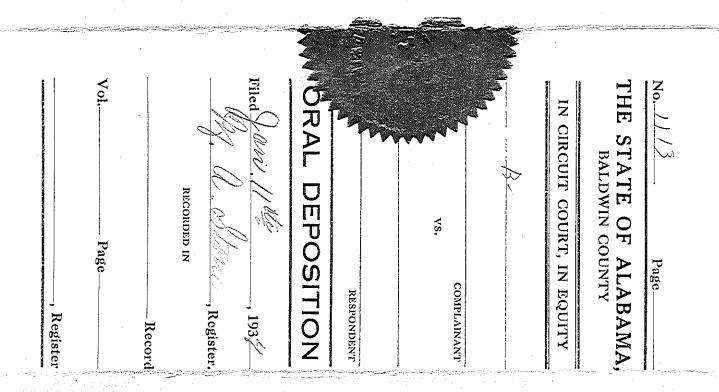
A. N. Vine a witness for thr Complainant being first duly sworn deposes and says:

I am personally acquainted with the Complainant, Angie L. Brunner and the respondent, John F. Brunner; they were married in 1929, and lived together in Foley, Baldwin County, Alabama, until to-wit: April 1st, 1931, when the respondent left the home, bed and board af the Complainant, and has remained away continuously since that time. I was with the them quite a bit while they lived together and know that the Complain-

ant gave the respondent no occasion for leaving her. The respondent, has so far as I know, and am advised, contributed nothing toward the maintenance and support of the Complainant.

a.H. anni

I, M. A. Stone	as Register and Commissioner hereby certify			
that the foregoing depositions on Oral Examination	was taken down in writing by me in the words			
of the witness and read over to them and	they signed the same in the presence 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 id	entity 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 6thd	ay of January 19 34.  Of Other (L. S.)			





# Circuit Court, Baldwin County, Ala., IN EQUITY.

Angie L. Brunne

**PLAINTIFF** 

DEFENDANT

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Hearing and passing on application for Receiver or Trustee 3 00			Commissioner's Fees	- I 513~
Each Settlement with Receiver or Trustee			Solicitor's Fees	
Examining each Voucher of Receiver or Trustee			Witness Fees	
Examing each Answer on Exception			Printer's Fees	
Recording Resignation or Suggestion of Death of Trustee 75  Entering each Certificate to Supreme Court			Trial Tax 3 (	10
Taking Questions and Answers, etc 25			Recording Decree in Probate Court	3 - 3
For all other service relating to such proceedings 1 00				1 1
For service in proceeding to relieve minors, etc. same fee as in similar cases.		ppila Jaddin	Total	
Commission on sales. etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000. 1 1 2 per cent; all over \$1.000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.	. manusia de la composition della composition de	70		
Sub Total Carried Forward				Page

Received payment this	day of	193
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Register.

Circuit Court, Baldwin County, Ala.
In Equity.

No. 1///3

VS.

Cost Bill

Paid \_\_\_\_\_\_, 1

Register.

HOORE PRINTING CO., BAY MINETTE, ALA.

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ANGIE L. BRUNNER.

VS.

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

JOHN F. BRUNNER,

Respondent.

This cause coming on to be heard, was submitted upon the original bill of complaint on behalf of the complainant, answer and agreement of the respondent, and testimony and pleadings 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 the respondent be and the same are hereby dissolved and the complainant is forever divorced from the respondent on the ground of voluntary abandonment.

It is further ORDERED that the said Angie L. Brunner be and she is hereby permitted to again contract marriage upon the payment of costs of court in this cause.

It is further ORDERED that the said Angie L. Brunner pay the costs herein taxed, for which execution may issue.

It is further ORDERED, ADJUDGED AND DECREED that the said Angie L. Brunner shall not again marry, except to the said John F. Brunner, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not marry again, except to the said John F. Brunner, during the pendency of the appeal.

It is further ORDERED, ADJUDGED AND DECREED that the said John F. Brunner be and he is hereby permitted to again contract marriage upon the payment of the costs of court in this cause.

Done at Monroeville, Monroe County, Alabama, on this

the _	// day o:	Pannary (, 1934.
		- AM Hare
		Judge of the Circuit Court of

Judge of the Circuit Court of Baldwin County, Alabama.

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