

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

Ora Lee Keel

Complainant

VS.

Louis J. Keel

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 Ora Lee Keel is forever divorced from the said Louis J. Keel

for and on account of Cruelty

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the Court, that the Complainant, Ora Lee Keel be and she is hereby awarded the custody, care and control of Beverly Ann Keel, provided however, the Respondent shall have the right to visit her at any reasonable time.

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 Ora Lee Keel the Complainant pay the cost herein to be taxed, for which execution may issue.

This 13<sup>th</sup> day of February, 1947

J. H. Stare  
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

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Page.

IN CIRCUIT COURT, IN EQUITY

Ora Lee Keel

vs. Complainant,

Louis J. Keel

Respondent

## DIVORCE DECREE

Filed this \_\_\_\_\_ day of \_\_\_\_\_

194

Register

[illegible]

**Figure 1**

[illegible]

$$\begin{aligned}
\text{1. } & \text{The } \mathcal{H}^1 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^1} \leq C \|\mathbf{f}\|_{\mathcal{H}^1} \\
\text{2. } & \text{The } \mathcal{H}^2 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^2} \leq C \|\mathbf{f}\|_{\mathcal{H}^2} \\
\text{3. } & \text{The } \mathcal{H}^3 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^3} \leq C \|\mathbf{f}\|_{\mathcal{H}^3} \\
\text{4. } & \text{The } \mathcal{H}^4 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^4} \leq C \|\mathbf{f}\|_{\mathcal{H}^4} \\
\text{5. } & \text{The } \mathcal{H}^5 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^5} \leq C \|\mathbf{f}\|_{\mathcal{H}^5} \\
\text{6. } & \text{The } \mathcal{H}^6 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^6} \leq C \|\mathbf{f}\|_{\mathcal{H}^6} \\
\text{7. } & \text{The } \mathcal{H}^7 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^7} \leq C \|\mathbf{f}\|_{\mathcal{H}^7} \\
\text{8. } & \text{The } \mathcal{H}^8 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^8} \leq C \|\mathbf{f}\|_{\mathcal{H}^8} \\
\text{9. } & \text{The } \mathcal{H}^9 \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^9} \leq C \|\mathbf{f}\|_{\mathcal{H}^9} \\
\text{10. } & \text{The } \mathcal{H}^{10} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{10}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{10}} \\
\text{11. } & \text{The } \mathcal{H}^{11} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{11}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{11}} \\
\text{12. } & \text{The } \mathcal{H}^{12} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{12}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{12}} \\
\text{13. } & \text{The } \mathcal{H}^{13} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{13}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{13}} \\
\text{14. } & \text{The } \mathcal{H}^{14} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{14}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{14}} \\
\text{15. } & \text{The } \mathcal{H}^{15} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{15}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{15}} \\
\text{16. } & \text{The } \mathcal{H}^{16} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{16}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{16}} \\
\text{17. } & \text{The } \mathcal{H}^{17} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{17}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{17}} \\
\text{18. } & \text{The } \mathcal{H}^{18} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{18}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{18}} \\
\text{19. } & \text{The } \mathcal{H}^{19} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{19}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{19}} \\
\text{20. } & \text{The } \mathcal{H}^{20} \text{ norm of } \mathbf{u} \text{ is bounded by } \|\mathbf{u}\|_{\mathcal{H}^{20}} \leq C \|\mathbf{f}\|_{\mathcal{H}^{20}}
\end{aligned}$$

[illegible][illegible]

Ora Lee Keel

vs.

Louis J. Keel

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 and waiver of the Respondent and Testimony of the  
Complainant

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

H.M. Hall

*Alfred J. Duck*

Register.

RECORDED

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

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Ora Lee Keel

VS.

Louis J. Keel

NOTE OF TESTIMONY

Filed in Open Court this 2-12-

day of \_\_\_\_\_, 1947

*Alvise J. French*  
Register.

Printed by The Baldwin Times, Bay Minette.

THE STATE OF ALABAMA,  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Ora Lee Keel

Complainant

VS.

Louis J. Keel

Respondent

I, Evelyn Kervin  
as ~~Register and~~ Commissioner

have called and caused to come before me Ora Lee Keel

witness named in the Requirement for Oral Examination, on the 12 day of February  
1947, at the office of Hubert M. Hall  
in Bay Minette, Alabama, and having first sworn said Witness to speak the  
truth, the whole truth, and nothing but the truth, the said  
Ora Lee Keel doth depose and say as follows:

My name is Ora Lee Keel. I am over 21 years of age and a resident of  
Robertsdale in Baldwin County, Alabama. The Respondent is over 21 years of  
age and a resident of Jefferson County, Alabama.

The Respondent and I married at Bay Minette, in Baldwin County, Alabama,  
on May 27, 1934. We lived together as husband and wife until January 1, 1946.  
We were living at Robertsdale in Baldwin County, Alabama, at the time of our  
separation.

The Respondent on January 1, 1946, threatened and abused and threatened  
to do actual violence to my person which would necessarily endanger my life  
and health. The conduct of the Respondent was such as to give me every  
reasonable apprehension to believe and I did actually believe that if I  
continued 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.

We have one child, Beverly Ann Keel, now 11 years old, who is now with  
me and has been all of her life. I am fully capable and a suitable, fit  
and proper person to have her care, custody and control.

Ora Lee Keel

ORAL EXAMINATION.

I, Evelyn Kerwin, 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 Hubert M. Hall

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 12th day of February, 194 7.

Evelyn Kerwin (L. S.)

NO. 1812 PAGE

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Ora Lee Keel

vs. Complainant

Louis J. Keel

Respondent.

Oral Deposition

Filed 2-12, 194 7

Oliver J. Keel, Register.  
Recorded in

Record

Vol. Page

, Register.

ORAL EXAMINATION.

I, Evelyn Kervin, 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 Hubert M. Hall

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 12th day of February, 194 7.

Evelyn Kervin (L. S.)

NO. <u>1812</u>	PAGE
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY.	
Ora Lee Keel	
vs.	Complainant
Louis J. Keel	
	Respondent.
Oral Deposition	
Filed <u>2-12</u>	, 194 <u>7</u>
<u>Oliver J. Keel</u>	Register.
Recorded in	
Vol. _____	Page _____
	, Register.

ORA LEE KEEL

COMPLAINANT

VS

LOUIS J. KEEL

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

It is agreed by and between the Complainant and the Respondent, that the Complainant is to have the custody, care and control of the minor child, Beverly Ann Keel, provided however, that the Respondent shall have the right to visit her at any reasonable time.

Louis J. Keel  
Ora Lee Keel

STATE OF ALABAMA  
BALDWIN COUNTY

I, J. J. Moore, a Notary Public, in and for said County, in said State, hereby certify that Ora Lee Keel and Louis J. Keel, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

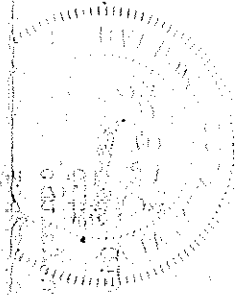
Given under my hand and seal on this the 12 day of February, 1947.

J. J. Moore  
Notary Public, Baldwin County, Alabama



1812

RECORDED



ORA LEE KEEL

COMPLAINANT

VS

LOUIS J. KEEL

RESPONDENT

AGREEMENT

*Filed*

*2-12-47*

*Alice J. Much*  
*Register*

STATE OF ALABAMA )  
BALDWIN COUNTY )

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU that you summons LOUIS J. KEEL, to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising chancery Jurisdiction, within thrity days after the service of summons, and there to plead, answer or demur, without oath, to a bill of complaint lately exhibited by ORA LEE KEEL, against the said LOUIS J. KEEL, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution to our said court immediately upon the execution thereof.

WITNESS, ALICE J. DUCK, Register of said Court, this the 20 day of January, 1947.

Alice J. Duck  
Register

ORA LEE KEEL

COMPLAINANT

VS

LOUIS J. KEEL

RESPONDENT

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

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

Your Complainant, Ora Lee Keel, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age, and a resident of Robertsedale, in Baldwin County, Alabama; that the Respondent is over twenty-one years of age and a resident of Jefferson County, Alabama, his address being 224- 50th Street, Fairfield, Alabama.

2.

That your Complainant and the Respondent married at Bay Minette, in Baldwin County, Alabama, on May 27, 1934; that they lived together as husband and wife until on, to-wit, January 1, 1946; that they were living at Roberts-dale in Baldwin County, Alabama, at the time of the commission of the acts herein after complained of and at the time of the separation.

3.

That on, to-wit, January 1, 1946, the Respondent threatened and abused the Complainant, and threatened to do actual violence to her person which would necessarily endanger her life and health. That the conduct of the Respondent was such as to give the Complainant every reasonable apprehension to believe, and she did actually believe that if she continued to live with the Respondent he would carry out his threats and do actual violence to her person which would necessarily endanger her life and health.

4.

That there was born between the marriage of the said Complainant and Respondent one child, Beverley Ann Keel, eleven years old, who is now with the Complainant; that your Complainant is a suitable, fit and proper person to have her care, custody and control.

WHEREFORE, the premises considered, Complainant prays that your Honor will by proper process make the said Louis J. Keel party Respondent to this cause of action, requiring her 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.

The Complainant prays that your Honor will, upon a hearing hereof, enter an order and decree, granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that she be awarded the custody of the minor child, Beverley Ann Keel; that she be granted 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.

J. H. Lacey  
Solicitor for the Complainant

1947 JAN 22 AM 11:41

EXECUTED this the 24  
day of Jan 1947  
by leaving a copy of the within with  
Louis J. Keel

HOLT A. McDOWELL, Sheriff,  
Jefferson County, Alabama

O. Hogan D.S.

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1812 RECORDED

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ORA LEE KEEL

COMPLAINANT

VS

LOUIS J. KEEL

RESPONDENT

SUMMONS AND COMPLAINT

Received in Sheriff's Office  
this 20 day of Jan, 1947  
W. R. STUART, Sheriff  
Taylor Wilkins

Filed  
1-20-47  
Alice J. Leach

*[Handwritten signature]*

ORA LEE KEEL

COMPLAINANT

VS

LOUIS J. KEEL

RESPONDENT

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

Now comes the Respondent and for answer to the Complainant's bill of complaint says:

1.

He admits the allegation contained in paragraph one.

2.

He admits the allegation in paragraph two as to marriage and separation but denies any allegation as to cruelty.

3.

He denies the allegation contained in paragraph three and demands strict proof of the same.

4.

He admits the allegations contained in paragraph four.

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 forthwith for final decree without further notice.

*Louis J. Keel*

STATE OF ALABAMA  
BALDWIN COUNTY

I, *Samuel*, a Notary Public, in and for said County, in said State, hereby certify that Louis J. Keel, whose name is signed to the foregoing conveyance, and who are 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 12th day of February, 1947.

*Samuel*  
Notary Public, Baldwin County, Alabama

1812

RECORDED

ORA LEE KEEL

COMPLAINANT

VS

LOUIS J. KEEL

RESPONDENT

ANSWER AND WAIVER

*Filed*

*2-12-47*

*Oliver J. Ruch  
Register*

THE STATE OF ALABAMA,  
BALDWIN COUNTY

## Circuit Court

To Evelyn Kervin

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 Ora Lee Keel

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Ora Lee Keel

Complainant  
and Louis J. Keel

Respondent

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

Witness 12 day of Feb, 1947

*Alvin J. Smith*  
Register

Commissioner's Fee, \$

Witness' Fees, \$

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

**THE STATE OF ALABAMA**  
**Baldwin County**  
**CIRCUIT COURT**

Ora Lee Keel

Complainant—

VS.

Louis J. Keel

Defendant—

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

**WITNESSES:**

2181