LUCILLE M. RAYBON.	THE STATE OF ALABAMA
DOCTIME M. RAIDON,	
Complainant.	_/ Baldwin County
Vs.	
J. G. RAYBON,	IN EQUITY
Respo dent	Circuit Court of Baldwin County
	-/
This cause is submitted in behalf of Complainar	nt upon the original Bill of Complaint,
Testimony of Mrs. Lucille M. I	Raybon and Ilene Raybon: Request
	to the state state of the state
for Decree in Vacation;	
·	
	•
Angwan	nd Wai ver.
in behalf of Defendant upon and	III HST AGT.
	G DUOIS
	alark, Tuesday
	Marufan

Register.

		· •		
STATE OF A	ALABAMA.	CIRCI	UIT COURT, II	N EQUITY.
BALDWIN	COUNTY	CIRCU No. 487	Sept.	Term, 1938
	LUCILL	E M. RAYBON,		, Complainant
		Vs.		
	J. G.	RAYBON,	· · · · · · · · · · · · · · · · · · ·	, Defendant
To R.	S. DUCK,	, Register	: :	
	stated cause #// P/		iig/heen/taken/	againsty the Defendant,
				for final decree, and no
defense having been in	iterposed, the Compl	lainant, by T.	J. WASHDUK	ــــــــــــــــــــــــــــــــــــــ
	·	Solicitors of record.	now files with	the Register of this Court
this written request to	o deliver the papers	in this cause to the Judg	ge for final decre	e in vacation.
		<u> </u>	. J. MASHB	
		<u> </u>		JRN, JR.

a. Co., Mobile

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

. :			E M.	•	Complai	nant
				vs.		
-	·	J. G.	RAYB	ON,	Respon	dent
This ca	use coming	on to be heard	was sub	mitted upor	Bill of Complaint, Dec	the Pro Confess
Answe:	r & Waiv	rer		and Testi	nony as noted by the R	egister, and upo
onsideration or in said bil		e Court is of the	opinio	1 that the Co	mplainant is entitled to	the relief praye
				and her than	Court that the bonds of	
					, and the same are herel	
at the said	**	LUCILLE 1	A. RAI	ZBON,	2	
forever div	orced from					
		J. G. RAY	TEON,			
r and on ac	count of					
		CRUELTY	E.			· 24
18 de						4°
		1 12 12 12 12 12 12 12 12 12 12 12 12 12				
						. 4
principal state a state present Miserbe						
	<i></i>	·				
ithin sixty (this decree, and that it each other during the	appeal is take
ithin sixty opeal. It is fu	days, neithe rther order	er party shall ag	ain mar <u>JE</u> M.	ry except to	each other during the	appeal is take pendency of sa
ithin sixty opeal. It is fue, and the	days, neithe rther order	er party shall ag	ain mar <u>JE</u> M.	ry except to	each other during the	appeal is take pendency of sa
ithin sixty opeal. It is fue, and the is suit.	days, neither ther order	er party shall ag ed that <u>TUCII</u> by permitted to	ain mar .L.F. M., again c	RAYBON ontract man	each other during the	appeal is take pendency of sa
ithin sixty opeal. It is fue, and the is suit. It is fue	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos	ain mar LE M. again c	RAYBON ontract man LUCILLE to be taxed	each other during the and J. G. RAYBOI riage upon the payment M. RAYBON	appeal is take pendency of sa
ithin sixty opeal. It is fue, and the is suit. It is fue	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos	ain mar LE M. again c	RAYBON ontract man	each other during the and J. G. RAYBOI riage upon the payment M. RAYBON	appeal is take pendency of sa
ithin sixty opeal. It is fure, and the is suit. It is fure.	days, neither ther order Substitute order Therefore order	er party shall ag ed that <u>LUCII</u> by permitted to ed that pay the cos	ain mar LE M. again c	RAYBON ontract man LUCILLE to be taxed	each other during the and J. G. RAYBOI riage upon the payment M. RAYBON	appeal is take pendency of sa
ithin sixty opeal. It is further, and the is suit. It is further comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that <u>LUCII</u> by permitted to ed that pay the cos	ain mar LE M. again c	RAYBON ontract man LUCILLE to be taxed	each other during the and J. G. RAYBOI riage upon the payment M. RAYBON	appeal is take pendency of sa a s
ithin sixty opeal. It is fue, and the is suit. It is fue. This	days, neither ther order Substitute order Therefore order	er party shall ag ed that IUCII by permitted to ed that pay the cos day of	ain mar LE M. again c t hereir	RAYBON ontract man LUCILLE n to be taxed eptember	and J. G. RAYBOI riage upon the payment M. RAYBON I, for which execution not payment to the payment of the paym	appeal is take pendency of sa not of the cost nay issue.
ithin sixty opeal. It is further, and the is suit. It is further comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour	ALE M. again control therein	RAYBON ontract man LUCILLE n to be taxed eptember	and J. G. RAYBOI riage upon the payment M. RAYBON d, for which execution in Judge Circuit Company and Judge Circuit Company (1988). Registery, Alabama, do hereby	appeal is take pendency of sale. Int of the cost hay issue. Sale. Ourt, in Equity. For of the Circurcertify that the cost is taken as a sale.
ithin sixty opeal. It is fue, and the is suit. It is fue. This	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour	ain mar LE M. again c t hereir f for Ba oing is	RAYBON ontract man LUCILLE to be taxed eptember aldwin Countract copy	and J. G. RAYBOI riage upon the payment M. RAYBON I, for which execution in Judge Circuit Control Type Alabama, do hereby by of the original decree	appeal is take pendency of sa pendency of sa nt of the cost nay issue. Solution in Equity. The cost of the Circuity certify that the rendered by the cost of the cost of the circuity certify that the rendered by the cost of the circuity certify that the rendered by the cost of the circuity certify that the circuit certify that the circuit certification is the circuit certification of the cost of the circuit certification is the circuit certification of the circuit certification of the circuit certification is the circuit certification of the circuit certification of the circuit certification is the circuit certification of the circuit certification of the circuit certification is the circuit certification of the ci
ithin sixty opeal. It is fue, and the is suit. It is fue. Comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour foreg Judg	ain mar LE M. again c t hereir t for Ba oing is e of the	RAYBON ontract man LUCILLE n to be taxed eptember aldwin Count a correct cop Circuit Cou	and J. G. RAYBOI riage upon the payment M. RAYBON d, for which execution in Judge Circuit Company and Judge Circuit Company (1988). Registery, Alabama, do hereby	appeal is take pendency of sa pendency of sa nt of the cost nay issue. Solution in Equity. The cost of the Circuity certify that the rendered by the cost of the cost of the circuity certify that the rendered by the cost of the circuity certify that the rendered by the cost of the circuity certify that the circuit certify that the circuit certification is the circuit certification of the cost of the circuit certification is the circuit certification of the circuit certification of the circuit certification is the circuit certification of the circuit certification of the circuit certification is the circuit certification of the circuit certification of the circuit certification is the circuit certification of the ci
ithin sixty opeal. It is fue, and the is suit. It is fue. Comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour foreg Judg	ain mar LE M. again c t herein t for Ba oing is e of the e is on	RAYBON ontract man LUCILLE n to be taxed eptember aldwin Count a correct cop Circuit Count file and enr	and J. G. RAYBOI riage upon the payment M. RAYBON I, for which execution in Judge Circuit Company of the original decrees out in the above stated colled in my office.	appeal is take pendency of sa pendency of sa to the cost may issue.
ithin sixty opeal. It is fue, and the is suit. It is fue. Comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour foreg Judg	ain mar LE M. again c t herein t for Ba oing is e of the e is on	RAYBON ontract man LUCILLE n to be taxed eptember aldwin Count a correct cop Circuit Count file and enr	and J. G. RAYBON riage upon the payment M. RAYBON I, for which execution in Judge Circuit Control of the original decrees art in the above stated of the original decrees art in the above stated of the original decrees art in the above stated of the original decrees art in the above stated of the original decrees art in the above stated of the original decrees art in the above stated of the original decrees art in the above stated of the original decrees art in the above stated of the original decrees are the origi	appeal is take pendency of sa pendency of sa pendency of sa pendency of the cost may issue. The cost pendency is the cost pendency issue. The cost pendency is the cost pendenc
ithin sixty opeal. It is fue, and the his suit. It is fue Comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour foreg Judg	again control of the second structure of the second st	RAYBON ontract man LUCILLE n to be taxed eptember aldwin Coun a correct cop Circuit Cou file and enr	and J. G. RAYBOI riage upon the payment M. RAYBON I, for which execution in Judge Circuit Company of the original decrees out in the above stated colled in my office.	appeal is take pendency of sa pendency of sa pendency of sa pendency of sa pendency of the cost pendency issue. See a pendency of sa pendency of the cost pendency issue. See a pendency of the cost pendency issue. See a pendency of the cost pendency issue. See a pendency of sa pendency of sa pendency issue. See a pendency of sa pendency of sa pendency issue. See a pendency of sa pendency of sa pendency issue. See a pendency issue.
ithin sixty opeal. It is fue, and the sis suit. It is fue Comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour foreg Judg decre	again control of the second structure of the second st	RAYBON ontract man LUCILLE n to be taxed eptember aldwin Coun a correct cop Circuit Cou file and enr	and J. G. RAYBON riage upon the payment M. RAYBON d, for which execution not payment to the payment of the payment of the control of the original decrees the payment of the payment of the original decrees the payment of the original decrees the payment of the payment	nt of the cost of the circumstance of
ithin sixty opeal. It is fue, and the his suit. It is fue Comp	days, neither ther order Substitute order Therefore order	er party shall ag ed that LUCII by permitted to ed that pay the cos day of Cour foreg Judg decre	again control of the second structure of the second st	RAYBON ontract man LUCILLE n to be taxed eptember aldwin Coun a correct cop Circuit Cou file and enr	and J. G. RAYBON riage upon the payment M. RAYBON d, for which execution not payment to the payment of the payment of the control of the original decrees the payment of the payment of the original decrees the payment of the original decrees the payment of the payment	appeal is tak pendency of sa pendency of sa pendency of sa pendency of sa pendency of the cost pendency certify that the rendered by the cause, which sa pendency of the cause of the cau

srererensionemenererensionererererererererererererererererere

LUCILLE M. RAYBON.

Complainant.

Vs.

J. G. RAYBON, Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Equity No.

ANSWER OF REPONDENT.

Comes now, J. G. Raybon, Respondent in the above styled cause, and for answer to the Bill of Complaint filed in said cause, says:

- 1. That he denies each and every allegation of the Bill of Complaint, separately and severally.
- 2. Respondent hereby expressly waives service and notice of demand for oral examination of Complainant's witnesses; of the issue of Commission to take **testimony**; of notice of the time and place set for taking the same; of the right of cross-examination of Complainant's witnesses; of the right to introduce evidence in his own behalf.
- 3. He further agrees that the said cause may be submitted for final decree at any time on the pleadings and on Complainant's evidence as noted by the Register.
- 4. The Respondent prays that, if the Honorable Court renders a decree against him as prayed by the Complainant, it will grant him the right to re-marry.

Réspondent.

LUCILLE M. RAYBON, Complainant,

Vs.

J. G. RAYBON,
Respondent.

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

Westimony of LUCILLE M. RAYBON, the Complainant.

The said witness, LUCILLE M. RAYBON, being first duly and legally sworn, testified as follows:

"My name is Lucille M. Raybon. I am the Complainant in this cause and I am over the age of twenty-one years. I have lived in Baldwin County, Alabama, since 1929.

J. G. Raybon is a resident of Bay Minette, Baldwin County, Alabama, and is over the age of twenty-one years.

The said J. G. Raybon, the Respondent in this cause, and I were married in Conecuh County, Alabama, on March 19, 1916, and we lived together as man and wife until the 25 day of May, 1938. On the 25 day of May, 1938, and other occasions before that, the said J. G. Raybon, the Respondent in this cause, struck me and cursed me and threatened my life. And I am afraid that if I continue to live with him as his wife, he will carry out his threats and will seriously injure my health or take my life. Since the 25 day of May, 1938, I have not lived with the said J. G. Raybon as man and wife. His cursing and striking me were not caused by any acts of mine."

Lucille m Raybon

STATE OF ALABAMA, BALDWIN COUNTY.

I. NanAlice Thompson, Deputy—, Register of the Circuit Court, in Equity, of Baldwin County, Alabama, hereby certify that on the 9th day of September , 1938, I caused the witness, Lucille M. Raybon, whose name is subscribed to the foregoing testimony, to appear before me at my office in Bay Minette, Alabama, where, after being duly and legally sworn, and upon examination by T. J. Mashburn, Jr., Solicitor for the Complainant, she testified as hereinabove set forth; that after her testimony was written down, it was read over and signed by her in my presence. I further certify that I am neither counsel nor of kin to either party in said cause, or in any way interested in the result thereof.

Witness my hand and seal this the 9th day of September 1938.

Sanshie Thompson

LUCILLE M. RAYBON, Complainant,

Vs.

J. G. RAYBON, 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 SITTING:

Comes your Complainant, LUCILLE N. RAYBON, and humbly complaining against the defendant, J. G. RAYBON, respectfully represents and shows unto your Honor and this Honorable Court the following facts as the basis for the relief hereinafter prayed;

- l. That both your Complainant and the Respondent are over twenty-one years of age and bona fide residents of Baldwin County, Alabama, and have been for more than eight years next preceding the filing of this bill of complaint.
- 2. That your Complainant and the Respondent are husband and wife, having intermarried at Evergreen, Alabama, on the 19 day of March, 1916; that they lived together as husband and wife in Baldwin County, Alabama, from 1929 to May, 1938.
- the Respondent cursed, abused and threatened the Complainant and several occasions actually committed violence to her person by striking and pushing her; that the conduct of the Respondent was such as to give the Complainant reasonable apprehension to believe and she does actually believe that it will be dangerous to her life and health to continue to live with the Respondent as his wife.

WHEREFORE, the premises considered, Complainant praises that your Honor will, by proper process, make the said J. G. Raybon 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;

Complainant further prays that upon a final hearing of this cause, your Honor will give and grant unto her a dcree of divorce forever barring the bonds of matrimony existing between her and the Respondent, J. G. RAYBON; that your Honor will grant her the right to re-marry should she so desire; 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.

J.A. Mashbury fr.
Solicitor for Complainant.

FOOT-NOTE:

The Respondent, J. G. RAYBON, is required to answer each and every allegation contained in the foregoing Bill of Complaint, in paragraphs 1 to 3, inclusive, but not under eath, eath being hereby expressly waived.

J. A. Mashburu dr. Solicitor for Complainant.

D	بد	w	k
7-	5	76	-7

No. of Educations and State		HERDENY SUR	PARTIES AND PROPERTY OF THE PR	ozy F
The	State	of	Alabama,	1
7 2 7 2 12 2 7 2	Baldw	in C	ounty.	
CTR	CHIT CO	JRT	IN EQUITY	

LUCILLE M. RAYBON,

Vs. Complainant.

J. G. RAYBON,

Respondent.

REQUEST FOR DECREE IN VACATION

Giled September 9. , 193 8

Man Aller Thompson, Register.

Recorded in _____ Record

Register.

Moore Ptg. Co. Bay Minette

RECORDED 2.3 PF

The second secon	
he State of Alabama BALDWIN COUNTY	
IN EQUITY ircuit Court of Baldwin County	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
79.4.5.4.6.6.6.6.6.6.6.6.6.6.6.6.6.6.6.6.6	· : :
LUCILLE M. RAYBON,	
Complainant.	
VS.	
J. G. RAYBON,	
Respondent.	
NOTE OF TESTIMONY	
Filed in Open Court this 9th	
day of September 193	8 esc
Ch lillar Comment	

ORAL DEFOSITION.

Filed September 9th, 1938,

R. S. Buck, Register.

Ey: Mandle Acrystal Deputy-Register.

ranson e cé pellen certe (5)

. Tanggan kanggan dan kanggan banggan kanggan kanggan kanggan banggan banggan banggan banggan banggan banggan ba

The State of Alabama
Baldwin County

In Circuit Court, In Equity

LUCILLE W. RAYBON,
vs. Complainant,
J. G. RAYBON,

Filed this /3 day o
September, 1938.

greger niegę fiele jigę sije of gree jakten lakten Lati Borgeb bus bygdiffer beseite gefijika, it malet al lagges fi tell fire spreed skil jo nettbare sik telja erek gree kreatskiste interkiska it erekiri elektorioastope set gerulo satio does of Igrova green Bese fiele green buffen oriek visit skilv skenge

A TRANSPORT OF A STATE OF THE SECOND SECOND

te, per est la ladareje jesti nego egat meze takalena akugé at betijapan pénaed ili VIII less at l Australia

randa kererakan kesilabah si dili

apari esta dell'arrecce dell'arrecce dell'arrecce cui de primere l'arrecte de l'arge l'art. Hag l'alla dell'arrecce dell'a

e de la companya de la co

and the Control Control on Earlie

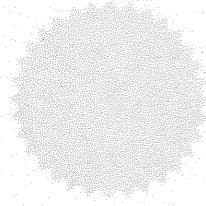
Theoric och to retribe?

Also bets victors victors to be accepted to the contribution of the contribution

vity velik da pe basa beeri tripi pepak P

65.2

views of Circuit Court in Repair



- was Spain Grad various associ