

IN RE THE MARRIAGE OF )	IN THE CIRCUIT COURT OF )
CAROLYN ELIZABETH KONRAD PATE )	MONTGOMERY COUNTY, ALABAMA )
and RICHARD STEWART PATE, )	DOMESTIC RELATIONS DIVISION )
Husband and Wife. )	CASE NO. DR-86- <u>884</u> )

PETITION FOR DIVORCE

The Wife respectfully represents and shows unto the Court as follows:

1. The Wife, Carolyn Elizabeth Konrad Pate, is over the age of 19 years and currently resides at 2059 Woodley Road, Montgomery, Alabama. She has resided at this address for more than six months preceding the filing of this petition for divorce.

2. The Husband, Richard Stewart Pate, is over the age of 19 years and a resident of Montgomery County, Alabama, presently residing in Montgomery County, Alabama and working out of the back shop at 2059 Woodley Road, Montgomery, Alabama.

3. The Husband and Wife were lawfully married on August 28, 1982 in Lowndesboro, Alabama.

4. There were no children born of the aforesaid marri-

5. The Wife avers that the parties jointly own certain real and personal property.

6. The Wife avers that there exists such a complete state

**FILED**

JUN 10 1986

Katie H. P...  
County Register

tions have become so widely divergent, there is only argument and disharmony in the marriage.

7. The Wife further avers that there has been an irretrievable breakdown of the marriage and that further attempts at reconciliation are impractical and futile and not in the best interests of the parties.

8. The Wife avers that the Husband has committed actual violence to her person and from his manner and conduct toward her, she is reasonably convinced that he will commit further violence upon her person, intended with danger to her life and health.

WHEREFORE THE PREMISES CONSIDERED, the Wife prays that the Court will take jurisdiction of this verified Petition for Divorce and cause a copy thereof to be served forthwith upon the Husband at the office of his attorney, Joe Espy, III, Melton & Espy, 339 Washington Avenue, Montgomery, Alabama, requiring him to plead and answer within the time required by law and the rules of this Honorable Court. Pending a final hearing of this cause, the Wife prays that the Court will award the Wife the exclusive use and occupancy of the home located at 2059 Woodley Road, Montgomery, Alabama, the exclusive use and control of the BMW automobile, and issue a restraining order strictly enjoining and restraining the said Husband from entering the resident premises at 2059 Woodley Road, Montgomery, Alabama, assaulting, threatening or intimidating the Wife in

any manner whatsoever, and on final hearing of this cause, the Wife prays for the following relief:

1. That the Court will grant her an absolute divorce of the marriage.
2. That the Court will order a division of the jointly owned real and personal property of the parties.
3. That the Court will grant the attorney for the Wife a reasonable fee for his services in this matter to be paid by the Husband.
4. That the Wife be restored her maiden name.
5. That the Wife be granted all such other, further and different relief, both general and special, to which she may be entitled.

  
 Carolyn Elizabeth Konrad Pate

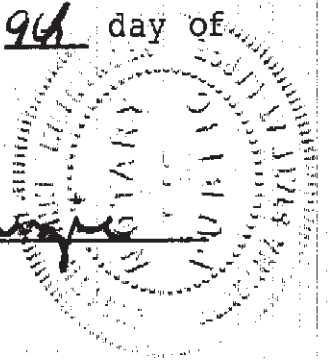
STATE OF ALABAMA     )

MONTGOMERY COUNTY    )

BEFORE ME, the undersigned authority, in and for said State and County, personally appeared Carolyn Elizabeth Konrad Pate, who is known to me and who being by me first duly sworn, deposes and says that she has read this instrument, has been advised of and understands its nature and effects, and authorizes its filing with the Court

SWORN TO and SUBSCRIBED before me on this the 9th day of  
June, 1986.

Judith Anne Minoppe  
Notary Public



Paul A. Brantley  
Paul A. Brantley  
Attorney for the Wife

OF COUNSEL:

BALCH & BINGHAM  
P. O. Box 78  
Montgomery, Alabama 36101  
(205) 834-6500

IN RE THE MARRIAGE OF )

CAROLYN ELIZABETH KONRAD PATE )

and RICHARD STEWART PATE, )

Husband and Wife. )

IN THE CIRCUIT COURT OF )

MONTGOMERY COUNTY, ALABAMA )

DOMESTIC RELATIONS DIVISION )

CASE NO. DR-86- 884 )

ORDER

THIS CAUSE to is submitted to the Court on the verified  
Petition for Divorce, and the Court having considered the same,  
it is,

ORDERED, ADJUDGED AND DECREED that the Husband be and  
hereby is strictly enjoined and restrained from assaulting,  
threatening or intimidating the Wife in any manner whatsoever.

It is further

ORDERED, ADJUDGED AND DECREED that the matters of tempor-  
ary exclusive use and occupancy of the home owned jointly by  
the parties located at 2059 Woodley Road, Montgomery, Alabama,  
and the exclusive use and control of the BMW automobile, pend-  
ing a final hearing of this cause, be and the same are hereby

set for a hearing before the Honorable James P. Woodson, III

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Katie H. Phillips  
Deputy Register

of this Court at 1:30 o'clock p.m. on the 20th  
day of June, 1986. It is further

ORDERED, ADJUDGED AND DECREED that a copy of the within  
Petition and this Order be served forthwith upon the Husband at  
the office of his attorney, Joe Espy, III, Melton & Espy, 339

DONE this the 10<sup>th</sup> day of June, 1986.

*Lynn Hardy Bright*  
Circuit Court Judge

Paul A. Brantley  
Joe Espy, III