

The State of Alabama }  
Baldwin County

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

JENNIE DEE SULLIVAN

COMPLAINANT

vs.

RUSE ONEAL SULLIVAN

RESPONDENT

I,

Frances Brantley

as Register and Commissioner

have called and caused to come before me

JENNIE DEE SULLIVAN and WILLIE REE COX

witnesses named in the Requirement for Oral Examination, on the 12th day of May

1941, at the office of BEEBE & HALL, LAWYERS,

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

truth, the whole truth, and nothing but the truth, the said

Jennie Dee Sullivan doth depose and say as follows:

My name is Jennie Dee Sullivan. I am a resident of Bay Minette, in Baldwin County, Alabama, and over twenty-one years of age. The Respondent, Ruse Oneal Sullivan is over twenty-one years of age and a bona fide resident of the State of Alabama, his address being Mobile, Alabama.

The Respondent and I were married at Lucedale, Mississippi, on August 4, 1941. We lived together as husband and wife, in the State of Alabama, until December 24, 1941.

The Respondent, soon after our marriage became addicted to habitual drunkenness; and while under the influence of strong drink he has an uncontrollable temper. On various occasions while I was living with him he threatened and abused me and on many occasions threatened to strike me. His conduct was such as to give me every reasonable apprehension to believe, and I did believe that if I continued to live with him he would carry out his threats, which would necessarily endanger my life and health. It is absolutely impossible for me to live with the Respondent as his wife. I have tried it repeatedly and on each occasion found that a reconciliation would not last, and finally I was forced to leave him for good.

*Jennie Dee Sullivan*  
*Joyner*

WILLIE REE COX, A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Willie Lee Cox. I live at Bay Minette, in Baldwin County, Alabama, and I am working in Mobile. I am personally acquainted with Jennie Dee Sullivan and Ruse Oneal Sullivan, the Complainant and Respondent in the above cause. I have known the Complainant all my life and the Respondent for the past several years, and especially while the Complainant and the Respondent were living together as husband and wife. The Respondent is a man who drinks to excess, and while under the influence of liquor, I have often heard him threaten and abuse the Complainant. I know of my own personal knowledge and observation that the conduct of the Respondent was such that it was impossible for the Complainant to live with him as his wife.

*Willie Lee Cox*

ORAL EXAMINATION

I, Frances Brantley, 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 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 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 12th day of May 19 42.

Frances Brantley (L. S.)

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

The State of Alabama  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

JENNIE DEE SULLIVAN

COMPLAINANT

vs.

ROSE ORIAL SULLIVAN

RESPONDENT

ORAL DEPOSITION

Filed May 15, 1942

R. S. Hall  
RECORDED IN \_\_\_\_\_  
Register

Record \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register \_\_\_\_\_

DEE SULLIVAN, COMPLAINANT,  
VS.  
RUSE ONEAL SULLIVAN, RESPONDENT.

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

And now comes the Respondent in his own proper person and denies each and every allegation contained in the Complainant's Bill of Complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony on behalf of the Complainant, the right to cross-examine the Complainant's witnesses, and agrees that the cause be submitted, forthwith, for final decree, without further notice.

R. O. Sullivan

WITNESSES:

Mrs. J. A. Davis

Ellis Garg

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

JENNIE DEE SULLIVAN Complainant
VS
RUSE ONEAL SULLIVAN Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso or Answer & Waiver of Respondent, 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 JENNIE DEE SULLIVAN is forever divorced from the said

RUSE ONEAL SULLIVAN
for and on account of Cruelty

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 JENNIE DEE SULLIVAN be, and she is hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that JENNIE DEE SULLIVAN the Complainant pay the cost herein to be taxed, for which execution may issue.

This 19th day of May, 1942
Judge Circuit Court, in Equity.

I, R. S. Duck, 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.

THE STATE OF ALABAMA,  
Baldwin County



CIRCUIT COURT

TO Frances Brantley

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 Jennie Dee Sullivan and Willie Ree Cox

as witnesses in behalf of Jennie Dee Sullivan in a cause pending in our Circuit Court of Baldwin County, of said State, wherein

Jennie Dee Sullivan Complainant

and

Ruse Oneal Sullivan Defendant,

on oath to be by you administered, upon

to take and certify the depositions of the witness-es and return the same to our Court, with all convenient speed, under your hand.

Witness 15 day of May, 1945

*R. Duck*

REGISTER

Commissioner's Fee \$

Witness' Fees, \$

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon RUSE ONEAL SULLIVAN to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction within thirty days after the service of this summons, and there to answer, plead, or demur, without oath, to a Bill of Complaint lately exhibited by JENNIE DEE SULLIVAN against said RUSE ONEAL SULLIVAN, and further to do and perform what said Judge shall order, and direct in that behalf, and this the Respondent 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, R. S. DUCK, Register of said Circuit Court, this the 30  
day of April, 1942.

R. S. Duck  
Register.

JENNIE DEE SULLIVAN, COMPLAINANT,

IN THE CIRCUIT COURT OF

VS.

BALDWIN COUNTY, ALABAMA,

RUSE ONEAL SULLIVAN, RESPONDENT.

IN EQUITY.

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

And now comes your Complainant, JENNIE DEE SULLIVAN, and humbly complaining against the Respondent, RUSE ONEAL SULLIVAN, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant and the Respondent are both residents of the State of Alabama, and over twenty-one years of age;
2. That the Complainant and the Respondent were married at Lucedale, Mississippi, on August 4, 1941, and lived together as husband and wife until December 24, 1941;
3. That the Respondent, after their marriage, became addicted to habitual drunkenness; that while under the influence of strong drink he has an uncontrollable temper, and often threatened and abused the Complainant, and his conduct was such as to cause the Complainant to have every reasonable apprehension to believe, and she did actually believe that if she continued to live with him he would carry out his threats, which would necessarily endanger her life and health.

Wherefore, the premises considered, the Complainant prays that this Honorable Court will by proper process make the said RUSE ONEAL SULLIVAN party respondent to this Bill of Complaint and by appropriate orders, require him to plead, answer or demur to the same within the time and under the penalties pres-

scribed 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 decree of absolute divorce, forever barring the bonds of matrimony existing between her and the Respondent; 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.

BEEBE & HALL

By: *Thurston*  
Solicitors for Complainant.