

842

TO THE HONORABLE F. W. HARE:

JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA:

SITTING IN EQUITY:

Comes COMER JACKSON and by this his Bill of Complaint, presented against ALINE JACKSON, respectfully shows:

FIRST: That he and the Defendant above named are both over the age of twenty-one years and are now and have been for more than five years next prior to the filing of this bill, bona fide residents of Baldwin County, Alabama, although within the past few months the said Aline Jackson has been sojourning in the city of Pensacola, Florida. That they were married in the city of Mobile in June, 1936, but from the date of said marriage and up to March 1941 resided at Daphne, Alabama as husband and wife.

SECOND: That on or about the month of March, 1941, the said Defendant, Aline Jackson, abandoned Complainant, who then discovered that she was maintaining immoral relations with another man whose name and address are at present unknown to Complainant, but with whom the said Aline, as Complainant is informed, lived for a number of months under adulterous relations.

THIRD: That the infidelity of Defendant has at no time been condoned by Complainant, who has since March 1941 lived entirely separate and apart from his said wife.

THE PREMISES CONSIDERED, Complainant prays that the said Aline Jackson be made party to this bill and by appropriate process be required to answer same within the time prescribed by law. Defendant being a non-resident, Complainant prays that service of notice of this proceeding be had upon her at her present address, 515 Railroad Street, Pensacola, Florida, by registered mail.

Complainant further prays that upon the hearing of this Cause a decree be rendered forever divorcing him from the said Aline Jackson, granting him the right to marry again should he so desire, and such other further or different relief as to equity may seem mete.

Elmer S. Rivaly
Solicitor for Complainant

STATE OF ALABAMA)

BALDWIN COUNTY)

Before me, the undersigned Notary, personally appeared this day E. G. RICKARBY, who being sworn says that he is the Solicitor for Complainant in the above-styled Cause, and that he is reliably informed and on such information so states, that the Defendant, Aline Jackson, is over the age of twenty-one years and now resides at 515 Railroad Street, Pensacola, Florida.

E. G. Rickarby
.....

Subscribed and sworn to before me this the seventeenth day of July, 1942.

~~*[Signature]*~~
Notary Public, Baldwin County, Alabama

COMER JACKSON
Complainant

Vs.

ALINE JACKSON
Respondent.

E Q U I T Y No. 842
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

Comes the Complainant and makes application to the Register of this Court to issue a commission to take the testimony or oral examination of the following named witnesses:

Comer Jackson; Sandy McMillan; Fred Jackson;
Dolph Jackson.

Honorable James M. Voltz who together with the witnesses, resides at Daphne, Alabama, is hereby suggested as a suitable person to act as commissioner in this cause.

Levin B. Pinkley
Solicitor for Complainant.

The State of Alabama, }
Baldwin County.

No. 843

CIRCUIT COURT, IN EQUITY

COMER JACKSON

Complainant

vs.

ALINE JACKSON

Defendant

In this cause it appears to the
that a Summons requiring the Defendant Aline Jackson

to appear and demur, plead to or answer the Bill of Complaint in this cause within thirty days after the
service of said Summons upon said Defendant
was served upon her by (the Sheriff) Registered mail County, Alabama, on the
30th day of July 1942

And the said Defendant ... having failed to demur, plead to or answer the said Bill of Complaint
to this date, it is now, therefore, on motion of Complainant

ordered and decreed that the said Bill of Complaint in this cause be and it hereby is in all things taken as
confessed against the said Aline Jackson

Defendant aforesaid.

This 10th day of September 1942.

Register.

RECORDED

No. 842 Page _____

**The State of Alabama,
Baldwin County**

Circuit Court In Equity

COMER JACKSON

vs.

ALINE JACKSON

**Decree Pro Confesso On
Personal Service.**

Issued 9/10 1942

[Handwritten Signature]

Register.

RECORDED
RECORDED

COMER JACKSON

Vs.

ALINE JACKSON

APPLICATION FOR COMMISSION.

John
Sept 10 1942
Paul
Re

The State of Alabama,
Baldwin County.

No. 842 CIRCUIT COURT IN EQUITY.

COMER JACKSON

Complainant

vs.

ALINE JACKSON

Defendant

Motion is hereby made for a Decree Pro Confesso against **ALINE JACKSON**

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant.....; and that said summons was duly served according to law, and that said Defendant...has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This *ninth* day of *September* 19*42*

Bevel B. Rinkley Solicitor.

RECORDED

No. **842** Page.....

The State of Alabama,
Baldwin County.

CIRCUIT COURT, IN EQUITY

COMER JACKSON

vs.

ALINE JACKSON

**MOTION FOR DECREE PRO
CONFESSO ON PERSONAL SERVICE**

Filed 9/10 1942

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Register.

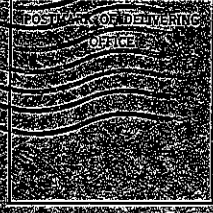
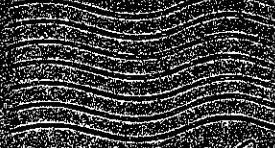
Recorded in..... Record,

Vol. Page.....

Register.

Post Office Department
OFFICIAL BUSINESS

REMIFFY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE. FINE



Return to *P. S. Duck*
(NAME OF SENDER)
Circuit Clerk
Street and Number, or Post Office Box

REGISTERED ARTICLE
No. *49*
INSURED PARCEL
Post Office *Bay Minette*
State *Ala*
No. *10-27221*

Form 3811
Rev. 7-1-40

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the number of which appears on the face of this Card.

1 Aline Jackson

(Signature or name of addressee)

2 _____
(Signature of addressee's agent. Agent should enter addressee's name on line ONE above.)

Date of delivery 1941

Handwritten signature/initials, possibly "Aline Jackson", written vertically on the right side of the card.

RECEIPT FOR REGISTERED ARTICLE No. 49

Fee paid: 13 class postage paid. 7-15, 1942
(Date)

Declared value, \$ None Surcharges paid, \$ _____
From R. J. Buck, Circuit Clerk
(Sender)

Addressed to W. H. Hine Jackson
(Street and number) (Post office and State)
515 Railroad St., (Address)
Pensacola (Post office and State)

Accepting employees fill place initials in space below, indicating restricted delivery
Return receipt fee 3 in person or order Special delivery fee _____
Delivery restricted to addressee Fee paid 10 Postmaster, per CR

GPO 16-12686

