

869

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

LOUISA JACKSON

Complainant

VS

ROOSEVELT JACKSON

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ ~~on Answer and 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 LOUISA JACKSON is forever divorced from the said

ROOSEVELT JACKSON

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 LOUISA JACKSON AND ROOSEVELT JACKSON be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

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

This 1st day of October, 1942 -

J. M. Hare
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.

LOUISA JACKSON, COMPLAINANT

VS.

ROOSEVELT JACKSON, RESPONDENT

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____

Answer and Waiver of the Respondent, and Testimony of Louisa Jackson
and Lizzie Thompson

and in behalf of Defendant upon _____

[Handwritten Signature]

Register.

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,
Baldwin County.

} NO. _____ TERM, 194__

LOUISA JACKSON,
Complainant—.

VS.

ROOSEVELT JACKSON,
Respondent—.

TO R. S. DUCK, REGISTER:

In the above stated cause an ~~Answer and Waiver~~ _____
having been _____ filed by _____ the Respondent—,
and evidence having been taken, and the cause being ready for submission for final decree, and
no defense having been interposed, the complainant—, by Beebe & Hall _____,
Solicitor^s— of record, now files with the Register of this Court this written request to deliver the
papers in this cause to the Judge for final decree in vacation.

H. M. Hall
Solicitor— for Complainant—.

Louisa Jackson,
Complainant,

vs

Roosevelt Jackson,
Respondent,

And now comes the Respondent and denies each and every allegation contained in the Complainant's bill of complaint, and demands strict proof of the same.

The Respondent waived notice of the time of taking testimony on behalf of the Complainant; the right to cross examine witnesses of the Complainant, and agree that this cause be submitted forthwith, without further notice.

The Respondent accepts service of the Summons and complaint.


Respondent

4.

That there was born to said marriage between your Complainant and the Respondent one child, now nineteen months old; that the Complainant has had the custody, care and control of said child all of its life, and for the facts above alleged, the Respondent is not a suitable, fit or proper person to have the care and custody of the said child.

PRAYER FOR PROCESS

Wherefore, the premises considered, your Complainant prays that your Honor will by proper process make the said ROOSEVELT JACKSON 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 hereof, your Honor will give and grant unto her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; and that a decree be made and entered awarding to her the care, custody and control of the child; and that your Honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BRESE & HALL

By: *S. S. Hall*
Solicitors for Complainant.

208

THE STATE OF ALABAMA
Baldwin County

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

LOUISA JACKSON

COMPLAINANT

VS.

ROOSEVELT JACKSON

RESPONDENT

I, Frances Brantley

as ~~Register and~~ Commissioner

have called and caused to come before me

Louisa Jackson and Lizzie Thompson

witnesses named in the Requirement for Oral Examination, on the 24 day of September

1942, at the office of BEEBE & 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

LOUISA JACKSON

doth depose and say as follows:

My name is Louisa Jackson. I live at Loxley, in Baldwin County, Alabama. I am over twenty-one years of age, and a resident of Baldwin County, Alabama.

Roosevelt Jackson and I were married at York, Alabama, in May, 1937. We moved to Baldwin County, Alabama, in September, 1941, and lived here until in April, 1942, when I was forced to leave the Respondent. Soon after we moved to Baldwin County, Alabama, the Respondent began mistreating me and would often leave me and the baby and come up to Bay Minette, and stay for long periods of time, and when he would come back he was always cross and mean to me, and threatened to abuse me, and just before leaving the last time he came to the house made and hit me three or four times with his fist. The Respondent has such a disposition that it is impossible to live with him and I am afraid that if I continue to live with him as his wife he will continue to mistreat me and do further violence to me by striking me, which would necessarily endanger my life and health.

We have one child who is nineteen months old and who is with me now. I am able and willing to assume the responsibility of caring and providing for the child. Roosevelt is staying around from place to place and has no regular home in which to keep the child.

Louisa Jackson

LIZZIE THOMPSON A WITNESS FOR THE COMPLAINANT, BEING FIRST DULY SWORN, DEPOSES AND SAYS:

My name is Lizzie Thompson. I live at Loxley, in Baldwin County, Alabama. I am personally acquainted with Louisa Jackson and also Roosevelt Jackson. I live and have lived near them since they have been in Baldwin County, Alabama, and I know that Roosevelt left home very often and when he came back he was always mad and abused his wife, Louisa Jackson, and on many occasions has actually struck her. I know of my own personal knowledge that the conduct of the Respondent is such as to cause the Complainant to have fear of bodily injury inflicted upon her, which would necessarily endanger her life and health, if she continued to live with the Respondent.

Lizzie Thompson

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - GREETING:

WE COMMAND YOU, That you summon ROOSEVELT JACKSON to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery jurisdiction within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by LOUISA JACKSON against said ROOSEVELT JACKSON, 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 29th day of Sept, 1942.

R. S. Duck
Register.

LOUISA JACKSON, COMPLAINANT,

VS.

ROOSEVELT JACKSON, RESPONDENT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

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

And now comes your Complainant, LOUISA JACKSON, and humbly complaining against the Respondent, ROOSEVELT JACKSON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age;

2.

That the Complainant and the Respondent were married at York, Alabama, in May, 1937, and lived together as husband and wife until in April, 1942;

3.

That on, to-wit, in April, 1942, and at various other times, the Respondent cursed, threatened and abused the Complainant, and on several occasions did actual violence to her person by striking her; 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 him, he would do further violence to her person, which would necessarily endanger her life and health;

869

LOUISA JACKSON, COMPLAINANT,

VS.

ROOSEVELT JACKSON, RESPONDENT.

SUMMONS AND COMPLAINT

Filed

9-29-42

R.S. Duck

BEEBE & HALL

NO. 869

LOUISA JACKSON

Complainant—

VS.

ROOSEVELT JACKSON

Respondent—

Request For Decree In Vacation

Filed 9-29, 1942

R. J. Luck

Register.

RECORDED

No. 869

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

LOUISA JACKSON, COMPLAINANT,

VS.

ROOSEVELT JACKSON, RESPONDENT.

NOTE OF TESTIMONY

Filed in Open Court this 29th

day of Sept 1942

R. S. Luck

Register.

869

4

LOUISA JACKSON, COMPLAINANT,

VS.

ROOSEVELT JACKSON, RESPONDENT.

ANSWER AND WAIVER OF THE
RESPONDENT.

Filed 9-29-12 H R

R. S. Duck

that there was born to said marriage between your complainant and the respondent one child, now nineteen months old; that the complainant has had the custody, care and control of said child all of its life, and for the facts above alleged, the respondent is not a suitable, fit or proper person to have the care and custody of the said child.

PRAYER FOR PROTECTIVE ORDER

Whereas the premises considered, your complainant, your Honor will by protective order make the said ROOSEVELT JACKSON, respondent to this bill of complaint, requesting his to place, demand to the same within the time and under the penalties prescribed law and the jurisdiction of this Honorable Court.

That your Honor will give and grant unto her an absolute decree of divorce, and during the bonds of matrimony existing between her and the respondent, and that a decree be made and entered awarding to her the care, custody and control of the child; and that your Honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

LOUISA JACKSON, COMPLAINANT,

ROOSEVELT JACKSON, RESPONDENT.

SUBMONS AND COMPLAINT

Filed 9 29 42
P. S. Walker

BREEBE & HALL

BREEBE & HALL

[Signature]

Attorney for Complainant.

869

IN THE CIRCUIT COURT OF THE STATE OF ALABAMA - BALDWIN COUNTY

WE COMMAND YOU, that you summon ROBERTA JACKSON to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, executing process of summons within thirty days after the service of summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by LOUISA JACKSON against said ROBERTA JACKSON, and further to do and perform what said Judge shall order and direct in that behalf, and that the Respondent shall in no wise fail, 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 my hand and the Seal of said Circuit Court, this 1st day of April, 1943.

[Signature]
Register

LOUISA JACKSON, COMPLAINT,
vs.
ROBERTA JACKSON, RESPONDENT.
IN EQUITY.

TO HONORABLE J. W. BAKER, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

And now comes your complainant, LOUISA JACKSON, and humbly complaining against the Respondent, ROBERTA JACKSON, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1. That the Complainant and the Respondent are both residents of Baldwin County, Alabama, and over twenty-one years of age;

2. That the Complainant and the Respondent were married at Loxley, Alabama, in May, 1927, and lived together as husband and wife until in April, 1942;

3. That on or about, in April, 1942, and at various other times, the Respondent cursed, threatened and abused the Complainant, and on several occasions did actual violence to her person by striking her; that the conduct of the Respondent was such as to give the Complainant every reason and cause to believe, and she did actually believe that if she continued to live with him, he would do further violence to her person, which would necessarily endanger her life and health;

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 ~~s~~ and read over to them and they signed the same in the presence of myself and H. W. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness~~s~~ or had proof made before me of the identity of said witness~~s~~; 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 24th day of September, 1942.

Frances Brantley

(L. S.)

No. 869 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

LOUISA JACKSON Complainant
 Vs.
ROOSEVELT JACKSON Respondent

ORAL DEPOSITION

Filed 9-29, 1942
B. S. Luck, Register
 RECORDED IN _____
 Record _____

Vol. _____ Page _____
 Register _____

THE STATE OF ALABAMA
Baldwin County

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

LOUISA JACKSON

COMPLAINANT

VS.

ROOSEVELT JACKSON

RESPONDENT

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Louisa Jackson and Lizzie Thompson

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We have one child who is nineteen months old and who is with me now. I am able and willing to assume the responsibility of caring and providing for the child. Roosevelt is staying around from place to place and has no regular home in which to keep the child.

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My name is Lizzie Thompson, I live at Loxley, in Baldwin County, Alabama. I am personally acquainted with Louisa Jackson and also Roosevelt Jackson. I live and have lived near them since they have been in Baldwin County, Alabama, and I know that Roosevelt left home very often and when he came back he was always mad and abused his wife, Louisa Jackson, and on many occasions has actually struck her. I know of my own personal knowledge that the conduct of the Respondent is such as to cause the Complainant to have fear of bodily injury inflicted upon her, which would necessarily endanger her life and health, if she continued to live with the Respondent.

Lizzie Thompson

BAY MINETTE, ALA.

19 No.



BALDWIN COUNTY BANK

61-258

PAY TO THE
ORDER OF _____

\$ _____

_____ DOLLARS

COUNTER CHECK

insures against fraudulent alteration
PAY TO YOUR BANK'S ORDER

Stone Cost 1500
Cost in this
Breeding Pkg 300
Milk cost 500
~~9800~~
Honey

9300
500
9800

ms