

237

JANE PICKETT,

Complainant,

-vs-

W. W. PICKETT,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

Comes the respondent in the above styled cause and accepts service of a Bill of Complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree.

And for answer to the Bill of Complaint heretofore filed in this cause, respondent says:

1. That he admits the allegations contained in Paragraph 1 of said Bill of Complaint.

2. That he admits the allegations contained in Paragraph 2 of said Bill of Complaint.

3. That he denies each and every allegation contained in Paragraph 3 of said Bill of Complaint and demands strict proof thereof.

W. W. Pickett

Sworn to and subscribed before me,
a Notary Public, on this 22 day
of October, 1949.

Edmund L. Roberts
Notary Public

2377

ANSWER & WAIVER

JANE PICKETT,

Complainant,

-vs-

W. W. PICKETT,

Respondent.

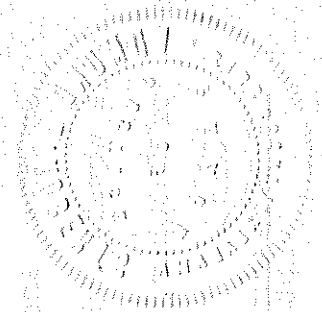
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

RECORDED

FILED

SEP 25 1949

ALICE J. DUCK, Register



JANE PICKETT,

Complainant,

-vs-

W. W. PICKETT,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, Sitting in Equity;

Your complainant, Jane Pickett, respectfully represents and
shows unto your Honor:

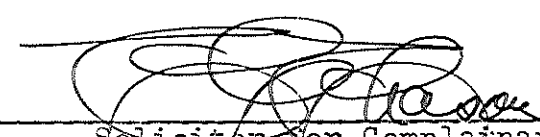
1. That complainant is over the age of twenty-one years and
is a resident of said County and State, and has been a bona fide
resident of said State for more than one year next preceding the
filing of this Bill of Complainant; that W. W. Pickett is over the
age of twenty-one years.

2. That your complainant and respondent were lawfull married
on or about, to-wit, October 9, 1946.

3. Complainant further avers that said respondent voluntarily
abandoned the bed and board of complaint for more than one year
next preceding the filing of this Bill of Complaint, since which
time complainant and respondent have not lived together nor in any
way recognized each other as husband and wife; and complainant fur-
ther avers that there were no children born of this marriage.

PRAYER FOR PROCESS AND RELIEF

THE PREMISES CONSIDERED, your complainant prays that W. W.
Pickett be made a party defendant to this cause by the usual pro-
cess of this Honorable Court requiring him to plead, answer or de-
mur within the time and under the penalties prescribed by the rules
of this Court and the statutes in such cases made and provided;
that upon a final hearing of this cause, that your complainant be
granted a divorce from said respondent. Should your complainant be
mistaken in the relief prayed for, that there be granted to her such
other, different and general relief to which she may be entitled and
as in duty bound, she will ever pray.


Solicitor for Complainant

THE STATE OF ALABAMA }
Baldwin County }

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

JANE PICKETT

COMPLAINANT

vs.

W. W. PICKETT

RESPONDENT

I, Lorna Underwood

as Register and Commissioner in chancery

have called and caused to come before me Jane Pickett and Florence Pickett

witness es named in the requirement for Oral Examination, on the 26th day of October

1949, at the office of C. G. Chason

in Foley, Alabama, and having first sworn said witness es to speak the

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

Florence Pickett doth depose and say as follows:

TESTIMONY OF JANE PICKETT:

My name is Jane Pickett; I am over the age of twenty-one years and a resident of Baldwin County, Alabama, having been a bona fide resident of said County and State for more than one year next preceding the filing of the Bill of Complaint; I married W. W. Pickett on October 9, 1946, and we lived together as man and wife until July of 1947, at which time he voluntarily abandoned me without cause and we have not lived together as man and wife since that time nor has he in any way treated me or considered me as his wife.

Jane Pickett

TESTIMONY OF FLORENCE PICKETT:

My name is Florence Pickett; I am over the age of twenty-one years and a resident of Baldwin County, Alabama; I am personally acquainted with Jane Pickett and W. W. Pickett and know that they were married on or about the 9th day of October, 1946; they lived together as man and wife until ~~the~~ July of 1947, at which time, W. W. Pickett voluntarily abandoned Jane Pickett and has in no way recognized her as his wife since that time; Jane Pickett has been a bona fide resident of Baldwin County, Alabama, for more than one year next preceding the filing of her Bill of Complaint for divorce.

Florence Pickett

I, Lorna Underwood as Register and Commissioner hereby certify that the foregoing deposition 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 C. G. Chason 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 26th day of October 1949.

Lorna Underwood (L. S.)

No. _____	Page _____
THE STATE OF ALABAMA, BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
JANE PICKETT COMPLAINANT	
vs. W. W. PICKETT RESPONDENT	
ORAL DEPOSITION	
Filed <u>10-31</u> , 194 <u>9</u> <u>W. W. Pickett</u> Register. RECORDED IN _____ Record _____ Vol. _____ Page _____ _____, Register	

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Lorna Underwood

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 Jane Pickett and Florence Pickett

as witnesses in behalf of Jane Pickett in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Jane Pickett is

_____, Complainant
and W. W. Pickett is

_____ Respondent_____

on oath, to be by you administered, upon them _____
to take and certify the depositions of the witness as and return the same to our Court, with all
convenient speed, under your hand.

Witness 25th day of October, 1949

Commissioner's Fee, \$ 5.00

Witness' Fees, \$_____

Register.

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JANE PICKETT

Complainant

VS.

W. W. PICKETT

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Lorna Underwood

WITNESSES:

Jane Pickett

Florence Pickett

JANE PICKETT

vs.

W. W. PICKETT

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
and Testimony of Jane Pickett and Florence Pickett _____

and in behalf of Defendant upon _____ answer and waiver _____

[Signature]
Attorney for Plaintiff

[Signature]

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

JANE PICKETT

VS.

W. W. PICKETT

NOTE OF TESTIMONY

Filed in Open Court this 31st

day of Oct, 1949

Archie J. Allen
Register.

Printed By The Baldwin Times

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

JANE PICKETT, Complainant

vs.

W. W. PICKETT, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and Answer~~
~~xxx Answer and Waiver~~ 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 here-
 tofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and
 that the said Jane Pickett is forever divorced from the
 said W. W. Pickett for and on account of

abandonment

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 the Complainant and Respondent be, and they are hereby permitted to
 again contract marriage upon the payment of the cost of this suit.

It is further ordered that W. W. Pickett

the respondent pay the cost herein to be taxed, for which execution may issue.

This 31st day of October, 1949.

Joseph G. Mashburn, Jr.
 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 de-
 cree is on file and enrolled in my office.

Witness my hand and seal this the _____ day
 of _____, 19_____

Register of Circuit Court, In Equity.

2377

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

JANE PICKETT

Complainant

vs.

W. W. PICKETT

Respondent

DIVORCE DECREE

FILED
OCT 31 1949
ALICE A. DUCK, Register