

DIVORCE DECREE

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

Annie Mae Johnson, Complainant

vs.

Curtis Lambert Johnson, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on 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 heretofore existing between the Complainant and Defendant be, and the same are hereby, dissolved, and that the said

Annie Mae Johnson is forever divorced from the said Curtis Lambert Johnson for and on account of Cruelty.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Complainant be and she is hereby awarded the care, custody and control of the minor child, Debra Ann Johnson, with the right of the Respondent to visit at reasonable times.

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 Annie Mae Johnson the Complainant pay the cost herein to be taxed, for which execution may issue.

This 16th day of March, 1954

Hubert M. Hall

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.

No. 3213 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Annie Mae Johnson

Complainant

vs.

Curtis Lambert Johnson

Respondent

DIVORCE DECREE

FILED
MAR 16 1954
ALLIE L. DICK, CLERK

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Evelyn Watts

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 Annie Mae Johnson and Maybelle Ard

as witnesses in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Annie Mae Johnson

is, Complainant
and Curtis Lambert Johnson

is Respondent
on oath, to be by you administered, upon Annie Mae Johnson and Maybelle Ard
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness 16th day of March, 1954

W. J. Renson
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3213

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Annie Mae Johnson

Complainant—

vs.

Curtis Lambert Johnson

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Evelyn Watts

WITNESSES:

Annie Mae Johnson

Maybelle Ard

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Annie Mae Johnson

Complainant

VS.

Curtis Lambert Johnson

Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Annie Mae Johnson and Maybelle Ard

witnesses named in the Requirement for Oral Examination, on the 16 day of March

1951, at the office of Walters & Brantley

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

truth, the whole truth, and nothing but the truth, the said Annie Mae Johnson and

Maybelle Ard doth depose and say as follows:

My name is Annie Mae Johnson. I am the Complainant in this cause. The Respondent and I are both bona fide residents citizens of Baldwin County, Alabama, and have been for more than two years next preceding this date. I am twenty years old. The Respondent is twenty years old. Curtis Lambert Johnson and I were married at Lucedale, Mississippi on September 1, 1951. There was born to our union, a girl, Debra Ann Johnson, who is now 17 months old. She has lived with me all of her life.

On March 8th of this year my husband, Curtis Johnson told me he would knock hell out of me and from his actions I believed he would have done this if I had not gotten out of his way. He has threatened to hit me on several occasions and from his manner of conduct I believe he would have if I had not gotten out of his way. I believe if I continue to live with the Respondent he will do actual violence to me which will endanger my life and health.

Annie Mae Johnson

My name is Mary Bell Ard. I am over the age of twenty-one years and the sister of Annie Mae Johnson. She and Curtis Lambert Johnson have lived together in Baldwin County since the date of their marriage which was September 1, 1951. They were married at Lucedale, Mississippi. Annie Mae and Curtis have a girl 17 months old named Debra Ann Johnson.

Debra Ann has lived with her mother all of her life. Annie Mae is in every respect a proper and suitable person to have her child's care, custody and control. Annie Mae is a Christian woman and is very devoted to her child and gives it proper attention and care. In my opinion Curtis Lambert Johnson is not a fit and proper person to have the care, custody and control of this child.

I have been in the home of the Complainant and Respondent on several occasions when Curtis Lambert threatened to strike and beat Annie Mae and from his manner of conduct I believe he would have struck her if she had not escaped him. I do not believe Annie Mae can continue to live with her husband without endangering her life and health. I believe it is to the best interest of Annie Mae and her child, Debra Ann that the Complainant and Respondent be granted a divorce.

Maybelle Ard

ORAL EXAMINATION

I, Evelyn Watts, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness and read over to them and they signed the same in the presence of myself and Tolbert M. Brantley

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proom made before me of the identity of said witness; 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 16 day of March, 1953

Evelyn Watts (L. S.)

No. _____	Page _____
The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
Annie Mae Johnson	
vs. Complainant	
Curtis Lambert Johnson	
Respondent	
Oral Deposition	
Filed _____, 19____	
MAR 16 1954	
Record	
Vol. _____	
Page _____	
Register	

Annie Mae Johnson

vs.

Curtis Lambert Johnson

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, _____

Answer and waiver of the Respondent and testimony of Annie Mae Johnson

and Maybelle Ard

and in behalf of Defendant upon Answer and waiver

William B. Brandy

W. J. Brandy
Register.

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Annie Mae Johnson

vs.

Curtis Lambert Johnson

NOTE OF TESTIMONY

Filed in Open Court this

day of **FILED**, 194

MAR 16 1954

Register.

Printed by the Baldwin Times

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons CURTIS LAMBERT JOHNSON to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by ANNIE MAE JOHNSON, as Complainant, and against Curtis Lambert Johnson, as Respondent.

WITNESS my hand this the _____ day of March, 1954.

Register

ANNIE MAE JOHNSON	Ø	
COMPLAINANT	Ø	IN THE CIRCUIT COURT OF
VS	Ø	BALDWIN COUNTY, ALABAMA,
CURTIS LAMBERT JOHNSON	Ø	IN EQUITY
RESPONDENT	Ø	

TO HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Your Complainant, Annie Mae Johnson, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide resident citizens of Baldwin County, Alabama, and have been for more than one year next preceding the filing of the bill of complaint, and twenty years of age.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on September 1, 1951, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit, March 8, 1954.

3.

That on to-wit, March 8, 1954, and on various occasions prior thereto the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

4.

That there was born to the marriage between your Complainant and the Respondent one child, Debra Ann Johnson, now seventeen months old, who is now and has been all of her life with her mother, the Complainant; that your complainant is a suitable, fit and proper person to have her care, custody and control.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Curtis Lambert Johnson, 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.

Your Complainant further prays that upon a final hearing hereof your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that your Complainant be awarded the permanent care, custody and control of the minor child, Debra Ann Johnson, Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Wilters & Brantley

BY:

Robert M Brantley
Solicitor for the Complainant

NO 3213

ANNIE MAE JOHNSON

COMPLAINANT

VS

CURTIS LAMBERT JOHNSON

RESPONDENT

BILL OF COMPLAINT

FILED
MAR 18 1954
AUG 1. 1954, Register

ANNIE MAE JOHNSON

COMPLAINANT

VS

CURTIS LAMBERT JOHNSON

RESPONDENT

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

Now comes the Respondent, in his own proper person, and admits the allegations contained in the bill of complaint filed in the above styled cause, as to ages, residence, marriage and children, but denies all other allegations contained therein and demands strict proof of the same.

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

Curtis L. Johnson

STATE OF ALABAMA
BALDWIN COUNTY

I, H. T. Childers a Justice of Peace, a ~~Notary Public~~, in and for said County, in said State, hereby certify that Curtis Lambert Johnson, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 15 day of March, 1954.

H. T. Childers J P
~~Notary Public~~, Baldwin County, Alabama.

3212

ANNIE MAE JOHNSON

COMPLAINANT

VS

CURTIS LAMBERT JOHNSON

RESPONDENT

ANSWER AND WAIVER

FILED
MAR 16 1954
ALICE L. DICK, CLERK