

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

Circuit Court, In Equity

Mattie Lou Mann, Complainant

vs.

Cellars C. Mann, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Answer and waiver~~ 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 Mattie Lou Mann is forever divorced from the said Cellars C. Mann 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 two minor children, Betty Joyce Mann and Linda Ann Mann.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the

Respondent pay to the Complainant for maintenance and support TWENTY FIVE (\$25.00) DOLLARS each week.

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 Cellars C. Mann the Respondent pay the cost herein to be taxed, for which execution may issue.

This 16th day of May, 1957.

Jeffrey J. Moulton, 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 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.

M.
No. 7644 Page 62

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

Mattie Lou Mann

Complainant

vs.

Cellars C. Mann

Respondent

DIVORCE DECREE

FILED
MAY 17 1951
ALICE J. DUCK, Register

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Mattie Lou Mann

Complainant

VS.

Cellars C. Mann

Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Mattie Lou Mann and Mrs. Mae Cottongin

witness ^{es} named in the Requirement for Oral Examination, on the 12 day of May
1945, at the office of H. M. Hall
in Bay Minette, Alabama, and having first sworn said Witness ^{es} to speak the
truth, the whole truth, and nothing but the truth, the said Mattie Lou Mann and
Mrs. Mae Cottongin doth depose and say as follows:

My name is Mattie Lou Mann. I am over twenty-one years of age and a bona fide resident of Bay Minette, Baldwin County, Alabama.

The Respondent, Cellars C. Mann, is over twenty-One years of age and a bona fide resident of Baldwin County, Alabama.

The Respondent and I married at Bay Minette, Alabama, on March 16, 1928. We lived together in Bay Minette as husband and wife until on to-wit November 1, 1950. The Respondent during the last few years that we lived together drank rather heavily, and on various occasions threatened, and abused me and threatened to do actual violence to my person which would necessarily endanger my life and health. The Respondent on one occasion, the exact date of which I do not remember, committed actual violence to my person by striking me with his hand. The conduct of the Respondent is such as to give me every reasonable apprehension to believe and I do actually believe that if I continued to live with him he would carry out his threats and do further violence to my person which would necessarily endanger my life and health. The Respondent and I have a small home near Bay Minette. We have reached a full and complete agreement as to the property whereby the Respondent is conveying it to me during my lifetime and at my death to our three children.

The Respondent has also agreed to contribute toward my support and the support of our two children who are at home, the sum of \$25.00 per week, which I believe, under the circumstances is reasonable.

One of our children Jeana Dean Powell is 20 years of age, married, and is living in the house with me, her husband being in service. Betty Joyce Mann is 17 years old and living with me. She has finished, this year, the 11th grade in high school. She is not working. We have one other child Linda Ann Mann who is now 4 years old and living with me. All three of our children are now and have been all of their lives living with me, and will continue to live in the home with me.

The Respondent is a carpenter by trade and owns no other property that the home place which I have referred to above.

Mattie Lou Mann

Mrs. Mae Cottongin, a witness for the Complainant, being first duly sworn, deposes and says: My name is Mae Cottongin. I live next door, about 100 feet from where Mr. and Mrs. Mann live. I have had occasion for the past five years, while I have been living next door neighbors to observe the conduct of the respondent, Mr. Mann. I know that the conduct of the Respondent toward the Complainant is such as to render it impossible for them to live together in any peace. Their three children live in the home with Mrs. Mann, who is a suitable, fit and proper person to have their care and control. I feel, under the circumstances, it is to the best interest of society, Mrs. Mann and the three children that the complainant be granted a divorce from the Respondent.

Mrs. Mae Cottongin

ORAL EXAMINATION.

I, Evelyn Watts, as Register and Commissioner hereby certify that the foregoing deposition son Oral Examination was taken down by me in writing in the words of the witness es and read over to them and thet 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 or had proom 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 12 day of May, 1951

Evelyn Watts (L. S.)

NO. 2644 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Mattie Lou Mann

vs. Complainant

Cellars C. Mann

Respondent.

Oral Deposition

Filed _____, 194____

_____, Register.

FILED
Recorded in

MAY 14 1951

Record

Vol. _____ Page _____

ALICE J. DUCK, Register

_____, Register.

MATTIE LOU MANN

COMPLAINANT

VS

CELLARS C. MANN

RESPONDENT

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

Now comes the Respondent and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations contained in the bill of complaint as to ages, residences and marriage, but denies all allegations as to cruelty and demands strict proof of the same; the Respondent admits that the Complainant and the Respondent have three children, Jeana Dean Powell, age 20, Betty Joyce Mann, age 17, and Linda Ann Mann, age 4; that the Complainant is the suitable, fit and proper person to have the custody of the two unmarried children, Betty Joyce Mann and Linda Ann Mann; that TWENTY FIVE (\$25.00) DOLLARS per week is a reasonable amount to be paid by the Respondent to the Complainant toward the maintenance and support of the children; that the Respondent will pay the taxes on the home of the Complainant and the three children, which is now and is to be occupied by the Complainant and her children as a home;

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

Cellars C. Mann

STATE OF ALABAMA
BALDWIN COUNTY

I, [Signature], a Notary Public, in and for said County, in said State, hereby certify that Cellars C. Mann, 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 said instrument he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 14 day of May, 1951.

[Signature]
Notary Public, Baldwin County, Ala.

RECORDED

NO 2644

MATTIE LOU MANN

COMPLAINANT

VS

CELLARS C. MANN

RESPONDENT

ANSWER AND WAIVER

FILED

MAY 14 1951

ALICE J. DUCK, Register

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 Mattie Lou Mann and Mrs. Mae Cottongin

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Mattie Lou Mann

Cellars C. Mann, Complainant
and Cellars C. Mann

Respondent

on oath, to be by you administered, upon Evelyn Watts
to take and certify the deposition s of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness 12th day of May, 1947

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Mattie Lou Mann

Complainant

vs.

Cellars C. Mann

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

Mattie Lou Mann

Mrs. Mae Cottongin

Mattie Lou Mann

vs.

Cellars C. Mann

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 Respondent, and testimony of Mattie Lou Mann
and Mrs. Mae Cottangin

and in behalf of Defendant upon _____

W. J. Smith
W. J. Smith
Register.

m

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Mattie Lou Mann

vs.

Cellars C. Mann

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194.....

FILED

MAY 14 1951

Register.

Printed By The Baldwin Times

ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons CELLARS C. MANN 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 Mattie Lou Mann as Complainant and against Cellars C. Mann as Respondent.

Witness my hand this the _____ day of May, 1951.

Register

MATTIE LOU MANN

COMPLAINANT

VS

CELLARS C. MANN

RESPONDENT

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

TO HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Your Complainant, Mattie Lou Mann, respectfully represents unto
your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent married at Bay Minette,
Alabama, on March 16, 1928, and lived together as husband and wife until
on to-wit November 1, 1950.

3.

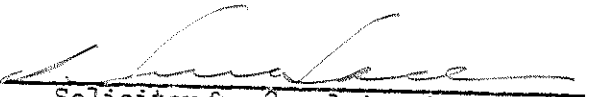
That your Respondent is a man that drinks rather heavily and on
various occasions threatened and abused the Complainant and threatened
to do actual violence to her person which would necessarily endanger her
life and health; the conduct of the Respondent was such as to give here
every reasonable apprehension to believe and she did actually believe
that if she continued to live with him he would carry out his threats
and do further 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 three children, Jeana Dean Powell age 20, Betty Joyce Mann age 17 and Linda Ann Mann age 4; that your Complainant is the proper person to have the care, custody and control of the said minor children;

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Cellars C. Mann party respondent to this cause of action, 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.

Yours Complainant prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to her the custody, care and control of the minor children, Betty Joyce Mann and Linda Ann Mann; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for Complainant

RECORDED

770 26 44

MATTIE LOU MANN

COMPLAINANT

VS

CELLARS C. MANN

RESPONDENT

BILL OF COMPLAINT

FILED

MAY 14 1951

ALICE J. DUCK, Register

RECORDED

710 2644

MATTIE LOU MANN

COMPLAINANT

VS

CELLARS C. MANN

RESPONDENT

BILL OF COMPLAINT

FILED

MAY 14 1951

ALICE J. DUCK, Register