

DIVORCE DECREE

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The State of Alabama, Baldwin County

Circuit Court, In Equity

MARJORIE JANE JONES, Complainant

vs.

CHESTER GRADY JONES, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~DEEDS AND CONFESION~~ 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 MARJORIE JANE JONES is forever divorced from the said CHESTER GRADY JONES for and on account of

CRUELTY

The Complainant is hereby given the right to resume the use of her maiden name, MARJORIE JANE COWHERD

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 MARJORIE JANE JONES the COMPLAINANT pay the cost herein to be taxed, for which execution may issue.

This 28th day of MAY, 1951

J. J. Madberry, 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.

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Marjorie Jane Jones

Complainant

VS.

Chester Grady Jones

Respondent

I, Bobby Jackson

as Register and Commissioner

have called and caused to come before me Marjorie Jane Jones and Mrs Peggy Wyatt

witness named in the Requirement for Oral Examination, on the 25 day of May

1945¹, at the office of Bobby Jackson

in Foley

, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said Marjorie Jane Jones and Mrs Peggy Wyatt doth depose and say as follows:

My name is Marjorie Jane Jones. I am over the age of 21 years and a resident of the State of Alabama and have been for more than two years next preceding the filing of this suit.

I was married to Chester Grady Jones on October 16, 1947 at Ashville, Ala. We have lived in Foley, Alabama for approximately three years. My husband and I have been having difficulties for the last two years and on numerous occasions he has struck me severely. At times he drinks very heavily and it is impossible to get along with him at these times. His continual mistreatment of me has caused me to be in bad health and afraid to live with him any longer. On the fifth day of this month Chester came home pretty well intoxicated and became very abusive to me and my sister who was visiting me at the time. He threatened to kill me if I didn't leave and when I attempted to pacify him he knocked me down and pulled me out of the house, and told me that if I came back he would kill me. I am afraid to live with him any longer as my fear of him is ruining my health and endangering my life.

Marjorie Jane Jones

My name is Mrs. Peggy Wyatt. Marjorie Jane Jones is my sister. I have been visiting her for several weeks due to her bad health. I talked to her Doctor, Dr. Van Wezel, here at Foley, and he told me he believed that all of her trouble was from nervousness due to her home life. On May the fifth my sisters husband came home and had been drinking. He struck my sister and put her out of the house and threatened to kill her if she came back. It will ruin my sisters health for her to continue to live with her husband.

Mrs Peggy Wyatt

ORAL EXAMINATION.

I, Bobby Jackson, 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 witnesses and read over to them and they signed the same in the presence of myself Bobby Jackson

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness as or had proom made before me of the identity of said witness as; 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 25 day of May, 1945

Bobby Jackson (L. S.)

NO. 265-3 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

MARJORIE JANE JONES

vs. Complainant

CHESTER GRADY JONES

Respondent.

Oral Deposition

Filed _____, 194_____

_____, Register.

Recorded in
MAY 22 1951
ALICE A. HUCK, Regis

Vol. _____ Page _____

_____, Register.

MARJORIE JANE JONES :
Complainant :
vs :
CHESTER GRADY JONES :
Respondent :

CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
IN EQUITY

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

Comes your Complainant, Marjorie Jane Jones, and respectfully
represents and shows to your Honor:

1. That she is over the age of twenty-one and is a bona fide
resident of Baldwin County, Alabama; that the Respondant Chester
Grady Jones, is over the age of twenty-one and is a bona fide res-
ident of Baldwin County, Alabama. That you complainant and respond-
ent have been bona fide residents of the State of Alabama for more
than two years next preceding the filing of this bill of complaint.

22 That your complainant and respondent were lawfully married
on or about to-wit, the sixteenth day of October 1947 at Ashville,
Alabama.

3. Your complainant avers and charges that the said respondent
did on or about the fifth day of May, 1951, and many times sub-
sequent thereto assault, beat, hit and strike complainant; that
said respondent has made numerous threats of doing her physical
harm and from his manner and conduct toward her, she is reasonably
convinced that he will commit an actual violence upon her person,
attended with danger to her life or health.

The premises considered, your complainant makes the said Chester
Grady Jones a party respondent to this Bill of Complaint, and in or-
der that the complainant may have the relief herein prayed for, may
it please your Honor to cause the State's writ of subpoena to be
issued, directed to the said Chester Grady Jones commanding him to
answer, plead, or demur to this bill of complaint, in the time re-
quired by law; and that on a final hearing of this cause, that your
Honor will enter a decree divorcing your complainant from the said
respondent, granting the complainant the right to remarry, and grant-
ing the complaintant the right to resume her maiden name, Marjorie
Jane Cowherd, and that your Honor will grant such other, further and
different relief as unto your Honor may seem just and proper, and
your complainant will ever pray.

Arthur L. Gerson
SOLICITOR FOR COMPLAINANT

MARJORIE JANE JONES :

Complainant :

VS :

CHESTER GRADY JONES :

Respondent :

CIRCUIT COURT

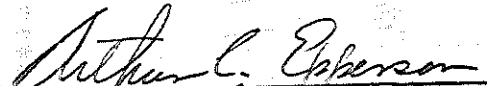
BALDWIN COUNTY, ALABAMA

IN EQUITY

No. _____

This cause being submitted for final decree in behalf of the Complainant, the complainant offers the following testimony, to-wit;

- 1st. Original bill of complaint.
- 2nd. Answer and waiver of the respondent
- 3rd. Commission to take deposition
- 4th. Oral depositions of complainant's witnesses.


SOLICITOR ~~FOR~~ COMPLAINANT

70 265-2
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

MARJORIE JANE JONES

Complainant

VS

CHESTER GRADY JONES

Respondent

NOTE OF SUBMISSION

FILED

MAY 28 1951

ALICE A. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Bobby Jackson, Foley, Alabama

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 Marjorie Jane Jones and Mrs Peggy Wyatt

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

_____, Complainant
and _____

Chester Grady Jones Respondent

on oath, to be by you administered, upon May 25, 1951
to take and certify the deposition^s of the witness^s and return the same to our Court, with all convenient speed, under your hand.

Witness 25 day of May, 195 1.

Ansie J. Wicks
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

RECEIPT
The State of Alabama, Baldwin County

No. 1772

Equity Division, Circuit Court.

Case No. 2653

Date 5-28, 1951

RECEIVED OF A. Epperson (Jones vs. Jones)
the sum of Twelve

Trial Tax	\$
	\$
	\$
	\$
	\$
	\$
	\$

As Register, Baldwin County, Ala.

TOTAL \$ 12.00

By _____

MARJORIE JANE JONES ;
Complainant :
vs :
CHESTER GRADY JONES :
Respondent :

CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO THE HONORABLE TELEFAIR J. MASHEURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes your Complainant, Marjorie Jane Jones, and respectfully represents and shows to your Honor:

1. That she is over the age of twenty-one and is a bona fide resident of Baldwin County, Alabama; that the Respondent Chester Grady Jones, is over the age of twenty-one and is a bona fide resident of Baldwin County, Alabama. That you complainant and respondent have been bona fide residents of the State of Alabama for more than two years next preceding the filing of this bill of complaint.

22 That your complainant and respondent were lawfully married on or about to-wit, the sixteenth day of October 1947 at Ashville, Alabama.

3. Your complainant avers and charges that the said respondent did on or about the fifth day of May, 1951, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

The premises considered, your complainant makes the said Chester Grady Jones a party respondent to this Bill of Complaint, and in order that the complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said Chester Grady Jones commanding him to answer, plead, or demur to this bill of complaint, in the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your complainant from the said respondent, granting the complainant the right to remarry, and granting the complaintant the right to resume her maiden name, Marjorie Jane Cowherd, and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your complainant will ever pray.


SOLICITOR FOR COMPLAINANT

MARJORIE JANE JONES :
Complainant :
vs :
CHESTER GRADY JONES :
Respondent :

CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
IN EQUITY

Now comes the respondent, CHESTER GRADY JONES, and for answer to the bill of complaint herein says as follows:

1. He admits the allegations of paragraphs one and two of said bill of complaint.

2. He denies each and every material allegation contained in paragraph three of the said bill of complaint and demands strict proof of same.

3. The respondent hereby waives notice of taking of testimony in this cause, notice of submitting said cause for final decree, and such other, further, or different notice to which he might otherwise be entitled.

Chester Grady Jones
RESPONDENT

Mrs Peggy Hyatt
Witness

Mrs Lillian Campbell
Witness

RECORDED

1202653

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

MARJORIE JANE JONES

Complainant

VS

CHESTER GRADY JONES

Respondent

ANSWER AND WAIVER

FILED

MAY 20 1951

ALICE J. DUCK, Register

ARTHUR C. EPPERSON

ATTORNEY AT LAW
FOLEY, ALABAMA

2653