

2654

STATE OF ALABAMA  
BALDWIN COUNTY

To James Huel Jackson

Whereas, Bobby Lucile Jackson has exhibited her bill of Complaint in equity in the Circuit Court of Baldwin County, and has obtained from the Honorable Telfair J. Mashburn Jr. a restraining order to restrain you hereinafter mentioned.

Now therefore, you, the said James Huel Jackson are hereby Ordered to: (1) That the Respondent, James Huel Jackson, refrain from disposing of or selling the following property to-wit:

Lots 10 and 11, Block 1, Robertsdale Terrace, a subdivision of the Southwest Quarter of the Southwest Quarter of the Southwest Quarter of Section 6, Township 6, South, Range 4, East, according to the official plat thereof recorded in Map Book 3 at page 36, Baldwin County, Alabama Records.

Or interfering with the possession and occupancy of the same by the Complainant. (2) That the Respondent refrain from in anyway, shape or form interfering with the Complainants possession, use or control of the 1949 4 door chevrolet in question. (3) That the respondent refrain from in anyway, shape or form molesting or interfering with the person, possessions of Complainant or premises occupied by the Complainant.

And this order you are required to obey under the penalties of 144, until the further order of this Court.

Witness my hand, this sixteenth day of July, 1951.

\_\_\_\_\_  
REGISTER

STATE OF ALABAMA  
BALDWIN COUNTY

To any Sheriff of the State of Alabama-Greeting:

We command you, that without delay you execute this writ, and make due return how you have executed the same according to law.

\_\_\_\_\_  
REGISTER

FILED IN 1951 JUL 16

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BOBBY LUCILE JACKSON )  
Complainant )  
VS )  
JAMES H. JACKSON )  
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, ALABAMA, SITTING IN EQUITY:

Comes your petitioner, Bobby Lucile Jackson, and respectfully  
represents and shows unto your Honor as follows:

ONE

That she has hertofore filed in this honorable court a bill  
seeking permanent alimony for support and maintenances against the  
respondent, James H. Jackson.

TWO

That she has heretofore filed in this honorable Court a  
petition for an order of reference for temporary alimony and  
attorney fee's pending litigation which order of reference was  
signed by your Honor on the 22 nd day of June, 1951.

THREE

That before and since the filing of said original Bill for  
Separate Maintenance and Support against the said respondent James  
Huel Jackson, your Complainant has been occupying alone as her home  
and place of residence the same premises as previously occupied by  
your Complainant and Respondent as husband and wife before separation  
occurred.

FOUR

That on numerous occasions the Respondent has attempted to  
interefare with your Complainant's occupancy of said premises pend-  
ing the litigation of said Support and Maintenance Suit and reference.

FIVE

That your Complainant has reason to believe and does believe  
that the Respondent intends and is attempting to sell said premises  
in bad faith and diverting the preceeds received outside of the reach  
of the Court to the detriment of the Complainant before liagation

of the cause and petition heretofore filed by your complainant.

SIX

That the Complainant received in the Month of February as a gift from the respondent a 1949 Four door chevrolet since which time said automobile has been in the exclusive use care and custody of your Complainant.

SEVEN

That upon to-wit: the morning of Friday, July thirteenth, 1951, the respondent with malice and aforethought did with force, threats and intimidation, take from the Complainant against her will the said chevrolet automobile and drove said automobile against your Complainant's body endangering her life and health.

EIGHT

That your Complainant is without financial means for her support and maintenance and further that said automobile and home is necessary to the welfare of your Complainant in maintaining a livelihood.

Wherefore the premises considered your petitioner prays that temporary affirmative relief will issue from this court pending a hearing of reference and pending litigation of the original complaint for permanent support and maintenance in this cause to the respondent, the said James Huel Jackson ordering him to return in good useable condition the property your petitioner to-wit: the four door 1949 chevrolet now in the possession of the respondent; and further ordering the said James Huel Jackson to refrain from interfering with in any way, shape, form the person or possession of the your petitioner and further more specifically ordering the Respondent not to sell or in anyway interfere with the premises now occupied by the petitioner alone and formerly occupied by the petitioner and respondent as man and wife, to-wit;

Lots 10 and 11, Block 1, Robertsdale Terrace, a subdivision of the Southwest Quarter of the Southwest Quarter of the South west Quarter of Section 6, Township 6, South, Range 4 East, according to the official plat thereof recorded in Map Book 3 at page 36, Baldwin County, Alabama Records.

And your petitioner prays for such other further or different relief as in Equity she may be entitled.

PETITIONER

of the cause and petition before filed by your complainant.  
STATE OF ALABAMA

K13

BALDWIN COUNTY

Before me, Arthur C. Apperson, a Notary Public for the state of Alabama at Large, personally appeared Bobby Lucile Jackson who being by me first duly sworn, doth depose and say that she is the complainant in the above entitled cause, and that the statements contained in this bill of Petition are true.

NEVER

Petitioner

Sworn to and subscribed before me this 14th day of July, 1951.

Arthur C. Apperson, A Notary Public for State of Ala. at Large

THAT

That your Complainant is without financial means for her support and maintenance and further that said automobile and home is necessary to the welfare of your Complainant in maintaining a livelihood.

That temporary affirmative relief will issue from this court pending a hearing of reference and pending litigation of the original complaint for permanent support and maintenance in this cause to the respondent, the said James Huel Jackson ordering him to return in good useable condition the property your petitioner is entitled to: the four door 1949 Chevrolet now in the possession of the respondent; and further ordering the said James Huel Jackson to refrain from interfering with in any way, shape, form the person or possession of the your petitioner and further more specifically ordering the Respondent not to sell or in any way interfere with the premises now occupied by the petitioner alone and formerly occupied by the petitioner and respondent as man and wife, to-wit:

Lot 10 and 11, Block 1, Robertsville Terrace, a subdivision of the Southwest Quarter of the Southwest Quarter of the South West Quarter of Section 6, Township 6, South, Range 4 East, according to the official plat thereof recorded in Map Book 3 of page 36, Baldwin County, Alabama Records.

And your petitioner prays for such other further or different relief as in Equity she may be entitled.

STATE OF ALABAMA

BALDWIN COUNTY

Before me, Arthur C. Epperson, a Notary Public for the State of Alabama at Large, personally appeared Bobby Lucile Jackson who being by me first duly sworn, doth depose and say that she is the complainant in the above entitled cause, and that the statements contained in this bill of Petitioner are true.

Petitioner

1951.

Sworn to and subscribed before me this 14th day of July,

*Arthur C. Epperson*  
Arthur C. Epperson, Notary Public  
For State of Alabama at Large

This cause being submitted to the Court upon application of the complainant for temporary order to the respondent to refrain from interfering with the person or property, of the complainant or the changing of the Status Quo <sup>of the property</sup> of the parties pending the hearing of reference and litigation in the original Bill and Petition filed in this cause and as prayed for in the petition herein, and upon consideration thereof the court being of the opinion that the same should be granted:

It is therefore ordered, adjudged and decreed by the Court that Register issue a temporary order pending the hearing of reference and litigation in this cause, ordering (1) That the Respondent James Huel Jackson, refrain from disposing of or selling the following property to-wit;

Lots 10 and 11, Block 1, Robertsdale Terrace, a subdivision of the Southwest Quarter of the Southwest Quarter of the Southwest Quarter of Section 6, Township 6, South, Range 4, East, according to the official plat thereof recorded in Map Book 3 at page 36, Baldwin County, Alabama Records.

Or interfering with the possession and occupancy of the same by the Complainant.

(2) That the Respondent refrain from in anyway, shape or form interfering with the Complainants possession, use or control of the 1949 4 door chevrolet in question.

(3) That the respondent refrain from in anyway, shape or form molesting or interfering with the person, possessions of Complainant or premises occupied by the Complainant.

Done and ordered this the Sixteenth day of July, 1951.

BOBBY LUCILE JACKSON :  
Complainant :

VS :

JAMES H. JACKSON :  
Respondent :

CIRCUIT COURT  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

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

Comes your petitioner, Bobby Lucile Jackson, and respectfully  
represents and shows unto your Honor as follows:

ONE

That she has filed in this Honorable Court a bill seeking  
alimony for support and maintenance against the respondent, James  
H. Jackson.


TWO

That she is without means of support during the pendency of  
this suit, and that said respondent is well able to provide support  
and maintenance for your complainant, but that said respondent has  
refused and failed so to do..

THREE

That she without means to pay her attorneys for their ser-  
vices, and that the respondent is well able to pay your petitioner  
attorney fee's.

The premises considered, your petitioner prays that your  
Honor will order the Register of this Court to hold a reference  
and to ascertain and report to this Court what will be a reasonable  
amount to be allowed to your petitioner during the pendency of this  
suit, and a reasonable amount to be paid by the respondent to the  
petitioner attorney's in your petitioners behalf, and your pet-  
itioner prays for general relief.

  
Attorney for Petitioner

## SUMMONS AND COMPLAINT

CIRCUIT COURT, BALDWIN COUNTY

THE STATE OF ALABAMA,

BALDWIN COUNTY

No. 2654

TERM, 19

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon James Huel Jackson

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in  
the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

James Huel Jackson

Defendant .....

by Bobby Lucille Jackson

Plaintiff.....

Witness my hand this 29th day of May 1951

Alicia Jackson, Clerk

BOBBY LUCILE JACKSON )  
Complainant )  
VS )  
JAMES HUEL JACKSON )  
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, ALABAMA, IN EQUITY.

Comes your complainant, Bobby Lucile Jackson, and respectfully represents unto 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 James Huel Jackson, is over the age of twenty-one and is a bona-fide resident of Baldwin County, Alabama.

2. That said Complainant and Respondent are lawfully married having been married at Pensacola, Florida, on the Thirty First day of July, 1943.

3. The Complainant avers that the said respondent did with force and threats of violence to the Complainant cause the Complainant to sign certain papers whereby the respondent did intend to use the said papers in securing a divorce from your Complainant and said papers were filed in the Circuit Court of Mobile County, Ala; That the respondent with abusive language and force did strike the Complainant and forcibly removed her and her personal effects from thier home and your Complainant avers and charges that the said respondent did on or about to wit: May 3, 1951 and on numerous occassions assault, beat, hit, and strike Complainant; that said respondent has committed actual violence on her person attended with danger to her health or life, Complainant avers and charges that 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.

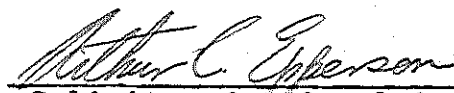
4. The complainant avers that the respondent has since said time ~~has~~ failed and refused to contribute to the Complainants support and maintenance.



5. The Complainant avers that it was necessary to engage an attorney to represent her and prevent the respondent from obtaining a divorce by fraud in the Circuit Court of Mobile County, Ala.

6. Your complainant avers that said respondent is a man of great means, owning considerable real and personal property from which he derives an income; that said complainant owns no property, and has no means of support, and that said respondent has refused and failed to provide for the support and maintenance of the complainant. Your complainant further avers that she is without means to pay her solicitors for their services rendered and to be rendered in this suit.

The premises considered, your complainant prays that your Honor will order <sup>service</sup> ~~service~~ to be had according to law upon said respondent commanding him to appear and plead, answer or demur to this bill of complaint within the time required by law and that your Honor will order the Register of this Court to hold a reference and report to this Court what would be a reasonable amount to be allowed your complainant's solicitors for their services herein, and what would be a reasonable amount to be allowed your complainant as alimony for her support and maintenance pending this suit, and upon a final hearing of this cause, that your Honor will render a decree granting to your complainant permanent alimony for her support and maintenance, and permanent attorney fees, and your complainant prays for such other, further or general relief to which she may be entitled, and your complainant will ever pray.

  
Solicitor for Complainant

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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Bobby Lucile Jackson

Complainant

VS

James Huel Jackson

Respondent

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BILL OF COMPLAINT

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ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

BOBBY LUCILE JACKSON )  
Complainant ))  
vs ))  
JAMES HUEL JACKSON )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ORDER OF REFERENCE

This cause coming on to be heard was submitted for an order of reference for temporary alimony. Upon consideration thereof it is ordered that the Register proceed and hold a reference according to the rules of this Court, of which notice of time and place shall be given to the parties in writing, or their Solicitors of Record at least ten days, unless waived in writing. On said reference either party may offer any legal and competent evidence, oral or written. And on said reference the Register shall ascertain and report to this Court:

FIRST: What real and personal property or interest therein each of the parties to this suit own, together with a full and accurate description thereof, and its situation, market and rental value, and what incumbrances, if any, are thereon.

SECOND: What income each of the parties to this suit have, either monthly or annually, and of what it consists, including wages received, rents or other kinds of income.

THIRD: What amount per month would be reasonably necessary to support and maintain complainant pending this suit, taking into consideration her condition in life and the ability of respondent to pay.

FOURTH: What amount would be reasonable for Complainant Solicitors Fee pendente litigation.

The Register will report her action under this decree, together with the testimony offered before her, to the Court.

This the 22<sup>nd</sup> day of June, 1951.

Jeffrey J. Maschbauer  
JUDGE

BOBBY LUCILE JACKSON  
Complainant

VS

JAMES H. JACKSON  
Respondent

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

IN EQUITY

TO JAMES H. JACKSON, RESPONDENT IN THE ABOVE STYLED CAUSE:

Your will take notice that on the 22<sup>nd</sup> day of June 1951 the judge of this Court made a decree ordering the Register to hold a reference to ascertain:

1. The property or interest therein each of the parties to this suit own, together with a full and accurate description thereof, and its situation, market and rental value, and what incumbrance, if any are, thereon.

2. What income each of the parties to this suit have, either monthly or annually, and what it consists, including wages received rents or other kind of income.

3. What amount per month would be reasonably necessary to support and maintain complainant pending this suit, taking into consideration her condition in life and the ability of respondent to pay.

You will take further notice that I have set the 10<sup>th</sup> day of July at 2:30 P.M. 1951 as the day to hear the said reference, which will be held at my office in the Court House in Bay Minette, Alabama at 2:30 O'clock P. M.

Witness my hand and seal as Register in Chancery this 26<sup>th</sup> day of June, 1951.

Alice L. Welch  
Register in Chancery