

1103

The State Of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

KATIE BELLE COOPER Complainant

VS

JACOB BRUNSON COOPER Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decrees Pro Confesso~~
on Answer & 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 KATIE BELLE COOPER
is forever divorced from the said

JACOB BRUNSON COOPER

for and on account of

CRUELTY

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 KATIE BELLE COOPER

be, and SHE hereby permitted to again contract marriage upon the payment of the cost of
this suit.

It is further ordered that JACOB BRUNSON COOPER

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

This 12th day of May, 1944

J. M. Hare
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. Page

The State Of Alabama

Baldwin County

In Circuit Court, In Equity

vs. Complainant.

Respondent.

DIVORCE DECREE

KATIE BELLE COOPER
COMPLAINANT

VS.

JACOB BRUNSON COOPER
DEFENDANT

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

AND now comes the Defendant in his own proper person and accepts service of the summons and complaint in the above styled cause, and denies each and every allegation contained in the bill of complaint, and demands strict proof of the same.

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

Jacob Brunson Cooper
Defendant.

Witness:

W. C. Beebe

Christine

THE STATE OF ALABAMA
Baldwin County

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

KATIE BELLE COOPER

COMPLAINANT

VS.

JACOB BRUNSON COOPER

RESPONDENT

I, Virginia Keel

as Register and Commissioner

have called and caused to come before me

Katie Belle Cooper and Cora A. Wooten

witnesses named in the Requirement for Oral Examination, on the 1st day of May

19⁴⁴, at the office of BEERE & HALL

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

the whole truth, and nothing but the truth, the said Katie Belle Cooper

doth depose and say as follows:

My name is Katie Bell Cooper. I am sixteen years of age and reside at Daphne at Baldwin County, Alabama. I married Jacob Brunson Cooper on July 17, 1943. We lived together in Baldwin County, until January 24, 1944, when we separated because of his cruelty. My husband, Mr. Cooper, is a man of violent and ungovernable temper and on numerous occasions has become angered at me without just cause, cursed and abused me and threatened to kill me. On numerous times he slapped me and bruised my face and head and threatened to kill me. He beat me several times with a large leather belt. He has been getting gradually worse for sometime and I fear that if I continued to live with him he would do me bodily harm attendant with danger to my life or health. He beat me just before I left him and told me to take my "damn clothes and get out" and I have not lived with him since.

Katie Belle Cooper

Cora A. Wooten, having first been duly sworn, deposes and says that:

My name is Cora A. Wooten. I am the mother of Katie Bell Cooper, Complainant in this suit. Her husband has been cruel to her and I have seen him beat her several times. She came to my house when he drove her out the last time. Should she continue to live with him he would kill her.

Cora - A - Wooten

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To Virginia Keel

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 Katie Belle Cooper and Cora A. Wooten

as witnesses in behalf of Katie Belle Cooper in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Katie Belle Copper

Complainant
and Jacob Brunson Cooper

Defendant,

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

Witness 9 day of May 1944

R. Duval

REGISTER

COMMISSIONER'S FEE, \$ _____

WITNESS' FEES, \$ _____

.....KATIE BELLE COOPER.....
Complainant,
VS.
.....JACOB BRUNSON COOPER.....
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from
.....Bay Minette....., in the County ofBaldwin.....

Alabama, the place of trial of said cause, to-wit:.....Katie Belle Cooper and.....
.....Cora A. Wooten.....

2. That said complainant requires an oral examination of said witnesses before a com-
missioner appointed by the Register of this Court.

B EEBE & HALL
By: *W C Bebe*
Solicitor for Complainant.

NOTE:

Complainant suggests the name of.....Virginia Keel.....,
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

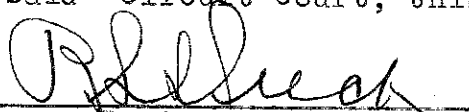
BEEBE & HALL
BY: *W C Bebe*
Solicitor for Complainant.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA ---GREETING:

WE COMMAND YOU, that you summon JACOB BRUNSON COOPER to be and appear before the Judge of the Circuit Court of Baldwin County, exercising chancery jurisdiction within sixty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by KATIE BELLE COOPER against the said JACOB BRUNSON COOPER, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your execution thereon, to our said Court, immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Circuit Court, this the 26 day of April, 1944.


Register.

KATIE BELLE COOPER
COMPLAINANT

VS.

JACOB BRUNSON COOPER
DEFENDANT

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

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now comes your Complainant, KATIE BELLE COOPER, and humbly complaining against the Defendant, JACOB BRUNSON COOPER, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant is sixteen years of age and the Defendant is over the age of twenty-one and are bonafide residents of Baldwin County, Alabama.

2.

That they were married at Crest View Florida, on the 17th day of July, 1943, and lived together as husband and wife in Baldwin County, Alabama, until January 24, 1944;

3.

That on, to-wit, January 24, 1944, at Daphne, Alabama, in

Baldwin County, Alabama, they separated; that the cause of their separation was the Defendant's cruel and inhuman treatment of the Complainant; and on numerous occasions slapped her and bruised her face and head and threatened to kill her. The Defendant is a man of ungovernable temper and often cursed, beat and abused this Complainant. Several times he beat her with a large leather belt. In January, 1944, after beating her severely he ordered her to leave and she separated from him and they have not lived together as husband and wife since. The conduct of the Defendant was such as to give the Complainant every reasonable apprehension to believe and she does believe that if she should continue to live with him he would do her bodily harm attendant with danger to her life or health; that said separation occurred in Baldwin County, Alabama.

Wherefore, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Jacob Brunson Cooper, party Defendant, 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.

Complainant further prays that upon a final hearing hereof, your Honor will give and grant unto her an absolute decree of divorce forever barring the bonds of matrimony existing between her and the Defendant, and that your Honor will give and grant unto her such other, further or different relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

BEEBE & HALL

By W. C. Beebe
Solicitors for Complainant.

Katie Belle Cooper

VS.

Jacob Brunson Cooper

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____
Answer and Waiver, Testimony of Complainant's witnesses.

and in behalf of Defendant upon _____

R. Dech Register.

1103

EX-6-40-800

DEMAND FOR ORAL EXAMINATION.

Cooper
Complainant,

Vs.
Cooper
Respondent.

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

Filed this *9* day of *May*,
194*4*.....

Richard
Register.

NO. _____

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

Complainant _____
vs. _____

Defendant _____

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

ORAL EXAMINATION

I, Virginia Keel, as ~~Register~~ and Commissioner hereby certify that the foregoing deposition ~~s~~ on Oral Examination was taken down in writing by me in the words of the witness~~es~~ and read over to me and they signed the same in the presence of myself W. C. Beebe

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 10th day of May, 19 44.

Virginia Keel (L. S.)

No. 1103 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Cooper

Complainant

Vs.

Cooper

Respondent

ORAL DEPOSITION

Filed May 10, 1944

Virginia Keel Register

RECORDED IN

Record

Vol. _____ Page _____

Register

1103

Cooper
J

Cooper

Cooper & Warren

Filed May 8, 1914
R. B. Cooper
J. B. Warren

No. 1162

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Cooper

VS.

Cooper

NOTE OF TESTIMONY

Filed in Open Court this 10

day of May 1944

Proctor

Register.

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 194_____

Katie Belle Cooper, Complainant

Vs.

Jacob Brauman Cooper, Defendant

To RS Luck, Register

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Beebe Hall

_____ Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Beebe Hall
By W C Beebe
Solicitor for Complainant.

No. 1103

Page _____

The State of Alabama,

Baldwin County

CIRCUIT COURT, IN EQUITY

Cooper

Vs.

Cooper

**REQUEST FOR DECREE IN
VACATION**

Filed May 10, 1944

Reed

Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.