# THE STATE OF ALABAMA, BALDWIN COUNTY

### CIRCUIT COURT, IN EQUITY

Sybeal Jones		, Complainant
	vs.	
	Ceibe Jones	, Respondent
This cause coming on to b	e heard was submitted upon Bill	of Complaint, Decree Pro-Confesso on
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Programme Control of the Control of		oted by the Register, and upon con- is entitled to the relief prayed for in
said bill.	re opinion that the Complament	is entitled to the Tener prayed for in
	ged and decreed by the Court tha	at the bonds of matrimony heretofore
		are hereby, dissolved, and that the said
•		
<b>S</b>	ybeal Jones	is forever divorced from the
said	eibe Jones	for and on account of
	:	
·		
	Voluntary abandonment	
		A .
in the second		
The state of the s		All V
days, neither party shall again marr	y except to each other during th Complainant and Respondent be	that if appeal is taken within sixty e pendency of said appeal.  e, and they are hereby permitted to
It is further ordered that	Sybeal 3	Jone s
		axed, for which execution may issue.
<b>→</b> (		axed, for which execution may issue.
Thisday of.		, 19_24
	14000	A M Tole
		Judge Circuit Court, In Equity.
	100000000000000000000000000000000000000	:
· I,	Court of Baldwin County, Algoing is a correct copy of the	Register of the Circuit labama, do hereby certify that the foree original decree rendered by the Judge bove stated cause, which said decree office.
	Witness my hand and s	seal this theday
	of	, 19 <b>54</b> _
		Register of Circuit Court, In Equity.
<u>.</u>		2

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THE STATE OF ALABAMA

BALDWIN COUNTY

In Circuit Court, In Equity

Sybeal Jones

Complainant :

Ceibe Jones

vs.

Respondent

## DIVORCE DECREE

FILED JUN 1 1954

ALLE J. LOCK, Register

My name is SYBEAL JONES and I am the Complainant bringing this action against my husband, CEIBE JONES.

Both my husband and I are over the age of twentyone years and I am a resident of Baldwin County, Alabama, and
have lived here all my life. I live in Daphne, Alabama. My husband, Ceibe Jones, lived here with me until we separated on the
15th of December, 1948, and he stayed around here a while after
that and then went to Mobile, Alabama, and he has been a bona
fide resident of Baldwin County, Alabama, up until 1948, and after
that time has been a bona fide resident of Mobile County, Alabama.

We were married in Mobile, Alabama, on January 17, 1947, and lived together as husband and wife for about a year, or until 15 December, 1948, when he left me. I gave him no reason for leaving me and I had been a good wife to him. He voluntarily left me then and we have not lived together since that time.

He is now living in Mobile County, Alabama.

We didn't have any children by this marriage and I am not asking for any support or alimony from him. I want a divorce from him and I am asking the court to give me the right to resume my maiden name.

Sybeal Jones

Subscribed and sworn to before me this the 27th day

Harristoner.

Sybeal Jones, Complainant

Testimony of Sybeal Jones

My name is LOUVENIA JONES BAILEY and I live in Daphne, Alabama, and I know the Complainant, SYBEAL JONES, and have been knowing her ever since she was a little girl. She has always lived in Baldwin County, Alabama, and she is now living in Daphne, Blabama.

I know she was married about five or six years ago and she was married to CEIBE MONES and they lived here in Daphne, Baldwin County, Alabama, up until about three years ago.

I know that he left her and they have been living separate and apart for over a year.

There are no children born to this marriage.

I know that Sybeal Jones is a good woman and tried to make a good wife for him but he just up and left her.

Louvenia Jones Bailey

Subscribed and sworn to before me this the 27th day of May, 1954.

Gommissioner.

Sybeal Jones, Complainant,

-vs

Ceibe Jones, Defendant

Testimony of Louvenia Jones Bailey I, Florence C. Isbell, acting as Commissioner by agreement of parties, do hereby certify that in a case pending in the Equity side of the Circuit Court of Baldwin County, Alabama, wherein SYBEAL JONES is Complainant and CEIBE JONES is Defendant, I caused the witnesses, namely, Sybeal Jones and Louvenia Jones Bailey, who were made known to me, to come to my office in the Bank Building in the City of Fairhope, Alabama, where the said witnesses after being first duly sworn by me, upon examination by E. G. Rickarby, Jr., Esq., of Counsel for Complainant, testified as hereinbefore written;

And that their testimony was by me reduced to writing as given by them, as near as might be in their identical language, and after being so reduced to writing, was read over by the
said witnesses, who assented to and signed the same in my presence.

I further certify that I am not of counsel or kin to either of the parties to the cause, or in anywise interested in the results thereof.

IN WITNESS WHEREOF, I hereunto set my hand and seal as Commissioner this the 27th day of May, 1954.

Herence Commissioner.

Commissioner's Fee: \$3.00

Complainant

Ceibe Jones, Defendant

Commission by Agreement of Parties

TILE D MAX: SI 1950

ALCE I DECK, Register

SYBEAL JONES,

Complainant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

-VS-

IN EQUITY

CEIBE JONES,

Defendant

#### NOTE OF EVIDENCE

AT the hearing of this cause the following note of evidence was taken, to-wit:

#### FOR COMPLAINANT:

Bill of Complaint and testimony of Sybeal Jones, Complainant, and Louvenia Jones Bailey, Witnesses for Complainant.

#### FOR RESPONDENT:

Answermand waiver.

RICKARBY & RICKARBY

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Bv:

E. G. Rickarby, Jr., Attorney for Complainant

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SYBEAL JONES,

Complainant

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

VS

IN EQUITY

CEIBE JONES,

Respondent

### ANSWER AND WAIVER

Comes CEIBE JONES, Respondent in the above styled cause and for answer to the bill of complaint says he denies each allegation of same.

Respondent hereby waives notice of demand for oral examination of Complainant's witnesses; of the issue of commission to take testimony; of the time and place set for taking same and of the right to introduce evidence in his own behalf.

Respondent further agrees that this cause may be submitted for final decree at any time on the pleading and Complainant's evidence as noted by the Register.

Respondent

STATE OF ALABAMA: COUNTY OF YOUR LEED:

Before me, the undersigned Notary Public, personally appeared Ceibe Jones who is known to me to be the Respondent above named and who acknowledged that he executed the foregoing answer voluntarily with knowledge of its contents.

May, 1954. WITNESS my hand and official seal this the 2/ day of

Roymond Harriso Pury L.
Notary Public, Walul County, Alabama.

my Commission Expusagust 13, 1955

Sybeal Jones, Complainant

-VS-

Ceibe Jones, Defendant

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Answer and Waiver

FILED BAY 31 1954

ALICE J. DUCK, Register

To the

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

Comes SYBEAL JONES, and by this her bill of complaint presented against CEIBE JONES, respectfully shows:

the age of twenty-one years and that both are now and have been for more than three years next preceding the filing of this bill residents of the State of Alabama, and the Complainant has been a bona fide resident of Baldwin County, Alabama, all that time and the Defendant resided in Baldwin County until the parties separated as hereinafter mentioned, and he is now a resident of Mobile, County, Alabama.

SECOND: Complainant and Defendant were married January 17, 1947, in Mobile, Alabama, and separated on or about the 15th day of December, 1948, and have not lived together since that time.

THIRD: That on or about the 15th of December, 1948, the Defendant voluntarily abandoned the bed and board of this Complainant while they were living in Baldwin County, Alabama, and said abandonment has continued up until the date of the filing of this bill.

THE PREMISES CONSIDERED, Complainant prays that Ceibe Jones be made party Defendant to this cause, and by proper process required to answer this bill within the time prescribed by law.

Complainant further prays that upon the hearing of this cause a decree be rendered forever divorcing her from said Ceibe Jones, granting her the right to marry again should she so desire, and to have such other, further, or different relief as to equity may seem meet.

RICKARBY & RICKARBY

By:

E. G. Rickaroy, Jr., Solicitor for Complainant.

Sybeal Jones,

Complainant

-V8-

Ceibe Jones,

Defendant

Bill of Complaint

FILED
MAY 31 1954
ALICE J. DUCK, Rogister

RECEIPT  The State of Alabama, Baldwin County  Equity Division, Circuit Court.	Nº	2364 1864
Case No.3265  RECEIVED OF Prescarby Syberger Vertee sum of Fried Tax  Trial Tax	6-1 Cech 8 \$ \$ \$	, 194°4
As Register, Baldwin County, Ala.  By		1500

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