

3286

DIVORCE DECREE

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

Council Jackson, Complainant
vs.

Lillie Jackson, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on 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

Council Jackson is forever divorced from the said Lillie Jackson for and on account of

Voluntary Abandonment

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 Council Jackson the Complainant pay the cost herein to be taxed, for which execution may issue.

This 28th day of June, 1954

Habert M. Miller
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. 3286 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Cornell Jackson

Complainant

vs.

Lillie Jackson

Respondent

DIVORCE DECREE

FILED
JUN 28 1954
ALICE J. DUCK, Register

The State of Alabama,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Council Jackson

Complainant

VS.

Lillie Jackson

Respondent

I, Evelyn Watts

as ~~Register and~~ Commissioner

have called and caused to come before me Council Jackson and Luzella Mike

witnesses named in the Requirement for Oral Examination, on the 23 day of June

1954, at the office of Walters & Brantley

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

truth, the whole truth, and nothing but the truth, the said Council Jackson and Luzella Mike

doth depose and say as follows:

My name is Council Jackson. I am over the age of twenty-one years and have lived in Alabama all of my life. I have lived in Baldwin County for the past seven years. My wife Lillie Jackson is over the age of twenty-one years and have lived in Alabama all of her life. She is presently living in Chestnut, Monroe County, Alabama. Lillie and I were married to one another at Chestnut, Alabama, on 3rd day of September, 1932. We lived together as man and wife until, to-wit, October 1947, at which time my wife, Lillie Jackson, quit living with me as my wife. This was without good reason and without my consent. I established a home for her at Stockton, Baldwin County, Alabama, for her and asked her to move down here with me. She refused to do this all though I provided a comfortable place for her to live. We have not lived together as man and wife since October, 1947.

Council Jackson

My name is Luzella Mike. I have known Council Jackson for six years. He has lived in Baldwin County, Alabama during this six years. During this period of time he has not lived with his wife, Lillie Jackson and she has not visited him in his home here in Baldwin County.

Luzella Mike

ORAL EXAMINATION

I, Evelyn Watts, 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 witness es and read over to them and they signed the same in the presence of myself and Tolbert M. Brantley

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es 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 23 day of June, 1954

Evelyn Watts (L. S.)

and the same is to be read to the witness if he is unable to read it himself. I, the Commissioner, do hereby certify that the foregoing deposition was taken down by me in writing in the words of the witness and read over to them and they signed the same in the presence of myself and Tolbert M. Brantley 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; 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.

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The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
Council Jackson	
vs.	Complainant
Little Jackson	
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ALICE J. DICK, Register	
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Council Jackson

vs.

Lillie Jackson

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, _____
and testimony of Council Jackson and Luzella Mike

and in behalf of Defendant upon Answer and waiver

Volbert M Brantley

Alfred J. Ruck

Register.

No. 9686.....

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Council Jackson

vs.

Lillie Jackson

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

FILED

JUN

26

1934

Register.

Printed by the Baldwin Times

ALICE T. DICK, Register

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 Council Jackson and Luzella Mike

as witnesses in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein
Council Jackson

and Lillie Jackson, Complainant

Respondent
on oath, to be by you administered, upon Council Jackson and Luzella Mike
to take and certify the deposition of the witness and return the same to our Court, with all
convenient speed, under your hand.

Witness 23rd day of June, 1954

Deice J. Houch Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3286

28/10

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Council Jackson

Complainant—

VS.

Lillie Jackson

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Evelyn Watts

FILED
WITNESSES:
JUN 26 1954

Council Jackson

ALICE I. DUCK, Register
Luzella Mike

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA;

You are hereby commanded to summons LILLIE JACKSON 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 COUNCIL JACKSON, as Complainant and against Lillie Jackson, as Respondent.

WITNESS my hand this the _____ day of June, 1954.

Register

COUNCIL JACKSON
COMPLAINANT
VS
LILLIE JACKSON
RESPONDENT

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

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

Your Complainant Council Jackson, respectfully represents unto Your
Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age and a bona fide resident citizen of Baldwin County, Alabama, and have been for more than two years next preceding the filing of this bill of complaint; that the Respondent is over twenty-one years of age and a resident of Chestnut, Monroe County, Alabama.

2.

That your Complainant and the Respondent married at Chestnut, Alabama, on September 3, 1932, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit, October 1947.

3.

The Complainant avers that the Respondent voluntarily abandoned his bed and board on to-wit, October, 1947, and that the Complainant moved to Baldwin County in to-wit, October, 1947, and established a home near Stockton, Alabama. That he asked the Respondent to come and live with him; that she repeatedly refused to do this. Your Complainant further avers that he and the Respondent have not lived together as man and wife since this date.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Lillie Jackson, party Respondent to this cause of action, requiring her 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.

Your Complainant prays that upon a hearing hereof, Your Honor will enter an order and decree granting to him an absolute decree of divorce forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different and general relief as he may be in equity and good conscience entitled to receive.

Wilters & Brantley

by: Alfred M Brantley
Solicitor for the Complainant

NO 3286

COUNCIL JACKSON

COMPLAINANT

VS

LILLIE JACKSON

RESPONDENT

BILL OF COMPLAINT

FILED

JUN 26 1954

ALICE J. DICK, Register

COUNCIL JACKSON
COMPLAINANT
VS
LILLIE JACKSON
RESPONDENT

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

Now comes the Respondent, in her own proper person, and admits the allegations contained in the Bill of Complaint filed in the above styled cause, as to ages, residence, and marriage, but denies all other allegations contained therein and demands strict proof of the same.

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

Lillie Jackson.

STATE OF ALABAMA
~~MONROE~~ COUNTY
MONROE

I, Marie Harper, a Notary Public, in and for said County, in said State, hereby certify that Lillie Jackson, 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 the instrument, she executed the same voluntarily on the day the same bears date.
Given under my hand and seal on this the 19 day of June, 1954.

Marie Harper, N. P.
Notary Public,

28 32

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COUNCIL JACKSON

COMPLAINANT

VS

LILLIE JACKSON

RESPONDENT

3286

ANSWER AND WAIVER

FILED

JUN 26 1954

ALICE J. DWCK, Register