

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

IMOGEAN CATON ROBERTS, Complainant

vs.

JACK DENVER ROBERTS, 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

IMOGEAN CATON ROBERTS is forever divorced from the said JACK DENVER ROBERTS 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 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 JACK DENVER ROBERTS the Respondent pay the cost herein to be taxed, for which execution may issue.

This 7 day of August, 1954.

*Hubert M. Zee*

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

Complainant

vs.

Respondent

DIVORCE DECREE

FILED  
AUG 7 1954  
ALICE J. DUCK, Register

The State of Alabama, { Circuit Court of Baldwin County, Alabama  
Baldwin County. (In Equity)

IMOGEAN CATON ROBERTS

Complainant

VS.

JACK DENVER ROBERTS

Respondent

I, Wilson Hayes

as ~~Register and~~ Commissioner

have called and caused to come before me IMOGEAN CATON ROBERTS AND MARY FRANCIS ROGERS

witness ES named in the Requirement for Oral Examination, on the 7th day of August

19 54, at the office of Telfair J. Mashburn, Jr.

in Bay Minette, Alabama, and having first sworn said Witness ES to speak the truth, the whole truth, and nothing but the truth, the said Imogean Caton Roberts

doth depose and say as follows: "My name is Imogean Caton Roberts. I am the complainant in this cause and I am over the age of twenty-one years. I am a bona fide resident citizen of the State of Alabama, and have been form more than two years next preceding the filing of the bill of complaint in this cause. The respondent, JACK DENVER ROBERTS, is over the age of twenty-one years and is a bona fide resident citizen of Alabama. I was married to the Respondent at Meridian, Mississippi, on June 4, 1954. I had not known my husband very long at the time I married him, but soon after our marriage, I discovered that he has a violent temper and is dangerous when he is angry. On several occasions he has struck me when angry and has threatened to do me serious bodily harm and I am convinced that, if I continue to live with him as his wife, he will kill or seriously injure me. I am taking this step reluctantly, but I am convinced that we can never live together as husband and wife. We have no children or community property." Further deponent says not.

Imogean Caton Roberts

The said Mary Francis Rogers doth depose and say as follows: "My name is Mary Francis Rogers. I am a sister to Imogean Caton Roberts, and I know that she is, and has been for more than the last, past, two years, a bona fide resident citizen of the State of Alabama. I know that she is over the age of twenty-one years. I know that Jack Denver Roberts is over the age of twentyone years and is a bona fide resident citizen of the State of Alabama. I know that my sister was married to Jack Denver Roberts in Meridian, Mississippi, on June 4, 1954. I have never seen Jack strike my sister, but I do know that he has a violent temper, and I do not believe that, under present conditions they will ever bee able to live together as husband and wife. I think it would be better for all concerned if they were divorced and permitted to go their respective ways." Further Deponent says not.

Mary Francis Rogers

ORAL EXAMINATION

I, Wilson Hayes, 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 Telfair J. Mashburn, Jr.

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness... 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 7th day of August, 1954

Wilson Hayes (L.S.)

|                                   |  |
|-----------------------------------|--|
| No. ....                          | Page .....                               |
| The State of Alabama              |  |
| Baldwin County.                   |  |
| In Circuit Court, In Equity       |  |
| vs.                               | Complainant                              |
| Respondent                        |  |
| Oral Deposition                   |  |
| Filed <u>FILED</u> , 19 <u>54</u> | Recorded in <u>Aug 7 1954</u> , Register |
| Vol. ....                         | Page ....                                |
| , Register                        |  |

THE STATE OF ALABAMA,  
Baldwin County.

TO: Wilson Hayes

Ben J. Hersch  
Register.

Witness' Fees, \$\_\_\_\_\_

IMOGEAN CATON ROBERTS

Complainant

vs.

JACK DENVER ROBERTS

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 of Baldwin  
Alabama, the place of trial of said cause, to-wit: Imogean Caton Roberts and  
Mary Francis Rogers

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

Julian J. Marshall, Jr.  
Solicitor for Complainant

### NOTE:

Complainant suggests the name of Wilson Hayes  
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Julian J. Marshall, Jr.  
Solicitor for Complainant.

DEMAND FOR ORAL EXAMINATION

Complainant

vs.

Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

Filed this

**FILED**

AUG 7 1954

194----

ALICE J. DUCK, Register

Register

Moore Printing Co.

IMOGEAN CATON ROBERTS

vs.

JACK DENVER ROBERTS

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, \_\_\_\_\_  
Answer and Waiver and Testimony of Imogean Caton Roberts and \_\_\_\_\_  
Mary Francis Rogers.

and in behalf of Defendant upon Answer and Waiver.

*Eric J. Hensch*  
Register.

*Jeffery M. Madison, Jr.  
Solicitor for Complainant*



No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

vs.

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of ....., 194 .....

**FILED**  
**AUG 7 1954**

Register.

Printed by the

**ALICE J. DICK, Register**

|                        |   |                          |
|------------------------|---|--------------------------|
| IMOGEAN CATON ROBERTS, | 0 | IN THE CIRCUIT COURT OF  |
|                        | 0 |                          |
| Complainant,           | 0 | BALDWIN COUNTY, ALABAMA. |
|                        | 0 |                          |
| VS.                    | 0 | IN EQUITY.               |
|                        | 0 |                          |
| JACK DENVER ROBERTS,   | 0 | NO. _____                |
|                        | 0 |                          |
| Respondent.            | 0 |                          |

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

Comes your Complainant, IMOGEAN CATON ROBERTS, and files this  
her bill of complaint against JACK DENVER ROBERTS, and respectfully  
represents and shows unto your Honor as follows:

1. That your Complainant is over the age of twenty-one years  
and is a bona fide resident citizen of the State of Alabama, and has  
been for more than two years next preceding the filing of this bill  
of complaint; that the respondent is over the age of twenty-one  
years and is a resident of the State of Alabama.

2. That your complainant and the respondent were lawfully mar-  
ried on, to-wit: June 4, 1954, at Meridian, Mississippi.

3. The complainant further avers that the Respondent has com-  
mitted actual violence on her person attended with danger to her life  
and health and from his conduct and manner she is reasonably appre-  
hensive of other and further violence, so much so that she can no longer  
live with the respondent as his wife; that the 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  
actual violence on her person attended with danger to her life or health.

PRAYER FOR PROCESS AND RELIEF.

THE PREMISES CONSIDERED, Your complainant prays that JACK DENVER  
ROBERTS be made a party defendant to this cause by the usual process  
of this Honorable Court, requiring him to plead, answer or demur to  
this bill of complaint within the time and under the penalties pre-  
scribed the rules of this Court and the Statutes in such cases made  
and provided; and that upon a final hearing of this cause she be  
granted a divorce from the said respondent and that she be granted the  
right to resume the use of her maiden name IMOGEAN CATON WILLIS; and  
Complainant prays for such other, further, different or general relief

as she may, in equity and good conscience, entitled to receive; and,  
as in duty bound, she will ever pray, Etc.

Julian A. Mallory, Jr.  
Solicitor for Complainant.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

NO. 3322

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IMOGEAN CATON ROBERTS,  
Complainant,

VS.

JACK DENVER ROBERTS,  
Respondent.

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BILL OF COMPLAINT.

FILED  
AUG 7 1954

ALICE J. DWCK, Register

IMOGHEAN CATON ROBERTS,  
Complainant,  
VS.  
JACK DENVER ROBERTS,  
Respondent.

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

WAIVER AND ANSWER.

Comes the respondent in the above-styled cause and accepts service of a bill of complaint heretofore filed in said cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause and consents that the same may be taken and the cause submitted for final decree at any time without further notice to him.

And for answer to the bill of complaint heretofore filed in this cause, respondent says:

1. He admits the allegations contained in paragraph 1 of said bill of complaint.
2. He admits the allegations contained in paragraph 2 of said bill of complaint.

Jack D. Roberts  
Respondent.

Executed in the presence of:

Benner Childress

Mrs. Angus Rogers

3322

3322

FILED

AUG 7 1954

ALICE J. DUCK, Register