

THE STATE OF ALABAMA, BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY

JACK E. DUNLAP

Complainant

VS.

EUNICE DUNLAP

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Services by Registered Mail 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 Jack E. Dunlap is forever divorced from the said Eunice Dunlap

for and on account of Abandonment

It is further ordered, adjudged and decreed by the Court that Jack E. Dunlap be, and he is hereby awarded the custody of the children; Jackie Dunlap, Charles Dunlap, and Betty Lou Dunlap.

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 E. Dunlap the Complainant pay the cost herein to be taxed, for which execution may issue.

This 29th day of June, 1945

J. W. 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**

Filed this \_\_\_\_\_ day of \_\_\_\_\_

\_\_\_\_\_, 194\_\_\_\_

Register

THE STATE OF ALABAMA,  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

JACK E. DUNLAP

Complainant

VS.

EUNICE DUNLAP

Respondent

I, Lillian Patterson

as ~~Register and~~ Commissioner

have called and caused to come before me Jack E. Dunlap, and Jackie Dunlap

witnesses named in the Requirement for Oral Examination, on the 14th day of June 1945, at the office of Beebe & 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 Jack E. Dunlap, and Jackie Dunlap doth depose and say as follows:

My name is Jack E. Dunlap. I am over twenty-one years of age, and a bona fide resident of Baldwin County, Alabama, and have been for more than 3 years next preceding the filing of the bill of complaint in this cause. The Respondent is over twenty-one years of age, a non resident of the State of Alabama, her last known address being Rt. No. 2, Box 464, Pensacola, Florida. The Respondent and I married at Seminole, in Baldwin County, Alabama, on October 16, 1935. We lived together as husband and wife until in October, 1942. In October 1942 the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time. There was born to the marriage between the Respondent and me three children; Jackie Dunlap, Charles Dunlap, and Betty Lou Dunlap, who are now 9, 7 and 5 years of age, respectively. The children have been with me practically all their lives, except short visits with their Mother. I have had the responsibility of their care, maintenance, and support. The Respondent voluntarily abandoned the children and has remained away from them almost continuously and apparently cares very little for them. The Respondent is now working at the Green Gables, a Night Club in Pensacola, and lives in a cabin near the Club. She has no place to keep, or to care for the children. The Mother and Father of the Respondent live near Pensacola, however, they are old and not physically or financially able to care for the children, and therefore could not properly care for them if they were turned over to the Respondent.

I have a home East of Robertsdale, which is suitable and I am able to care and provide for the Children.

Jack E. Dunlap

My name is Jackie Dunlap. I am the daughter of the Complainant and the Respondent in this cause. I am now staying with my Father East of Robertsdale, in Baldwin County, Alabama, where I wish to make my home, and I am very anxious to have my little brother and sister with me, and Father is able to take care of us, and does. My Mother and father have been separated for sometime, and they have not lived together as husband and wife. I have visited my Mother from time to time. My Mother has no place to keep me, other than with her Mother who has several children with her. My Mother is now working at the Green Gables, in Pensacola, and lives in one of the cabins there on the place.

Jackie L. Dunlap

**ORAL EXAMINATION.**

I, Lillian Patterson, as ~~Register and~~ Commissioner hereby certify that the foregoing depositions 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 H. M. Hall

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 14th day of June, 1945.

Lillian Patterson (L. S.)

NO. 1358 PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Jack Umble

vs. Complainant

Linnic Umble

Respondent.

**Oral Deposition**

Filed 6-25-, 1945

P. S. Wacha, Register.

Recorded in

\_\_\_\_\_ Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

\_\_\_\_\_, Register.

JACK E. DUNLAP

COMPLAINANT

VS.

EUNICE DUNLAP

RESPONDENT

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,  
Decree pro confesso.

and in behalf of Defendant upon

*R.S. Duck*

Register.

No. \_\_\_\_\_

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

*Jack Dunlap*

VS.

*Burice Dunlap*

**NOTE OF TESTIMONY**

Filed in Open Court this 25<sup>th</sup>

day of June 1936

*R.S. Ducha*

REGISTER



1208

Jackie dump

VB

Emice dump

Filed

10-6-44

R.S. Much  
Rey.



THE STATE OF ALABAMA,  
Baldwin County



CIRCUIT COURT

TO Lillian Patterson

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 Jack E. Dunlap, and Jackie L. Dunlap

as witnesses in behalf of Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Jack E. Dunlap

Complainant  
and Eunice Dunlap

Defendant,  
on oath to be by you administered, upon Jack E. Dunlap, and Jackie L. Dunlap

to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 25<sup>th</sup> day of June, 1945.

R.S. Duck

REGISTER

Commissioner's Fee \$ \_\_\_\_\_

Witness' Fees. \$ \_\_\_\_\_

NO. \_\_\_\_\_

**THE STATE OF ALABAMA**  
**Baldwin County**  
**CIRCUIT COURT**

*Jack Dumbly*

Complainant

VS.

*Sumner Dumbly*

Defendant

**Commission To Take Deposition**

COMMISSIONER:

Witnesses:

Form 384  
Rev. 1-26

# RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1 [Signature]  
(Signature of name of addressee)

2 \_\_\_\_\_  
(Signature of addressee's agent—Agent should enter addressee's name on line 3 and across)

Date of delivery 10/12, 1944

Post Office Department  
OFFICIAL BUSINESS



Return to *P. S. Quack*  
(Name of Sender)

(Street and Number)  
(or Post Office box)

REGISTERED ARTICLE

Post Office

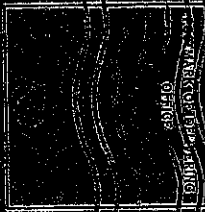
INSURED PARCEL

State

No.

AD-10000

POSTAGE WILL BE PAID BY ADDRESSEE



STATE OF ALABAMA  
BALDWIN COUNTY

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

WE COMMAND YOU, that you summon EUNICE DUNLAP to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery Jurisdiction within thirty days after the service of the summons, and there to answer, plead or demur without oath to a bill of complaint, lately exhibited by Jack E. Dunlap, against the said Eunice Dunlap, 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 of the law. 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 6<sup>th</sup> day of October, 1944.

R. S. Duck  
Register

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JACK E. DUNLAP	}	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
COMPLAINANT		
VS.	}	IN EQUITY
EUNICE DUNLAP		
RESPONDENT		

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

Now comes your Complainant, Jack E. Dunlap, and humbly complaining against the Respondent, Eunice Dunlap, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That the Complainant is over twenty-one years of age, a bona-fide resident of Baldwin County, Alabama, and has been for more than three years next preceding the filing of this bill of complaint; that the Respondent is over twenty-one years of age, a non-resident of the State of Alabama, her address being Rt. No. 2, Box 464, Pensacola, Florida.

2.

That the Complainant and the Respondent were married at Seminole, in Baldwin County, Alabama, on October 16, 1935, and lived together as husband and wife until in October, 1942.

3.

That in October 1942, the Respondent voluntarily abandoned the bed

and board of the Complainant and has remained away voluntarily and continuously since that time.

4.

That there was born to said marriage between your Complainant and the Respondent, three children, Jackie Dunlap, age eight, Charles Dunlap, age six and Bettie Lou Dunlap, age four; that said children now are, and have been all their lives with your Complainant, who has had the responsibility of their care, maintenance and support; but that the Respondent abandoned said children and has remained away from them, and is of such character that she is not a suitable, fit, or, proper person to have their care and custody, wherefore, the premises considered your Complainant prays that your Honor will by proper process, make the said Eunice Dunlap, party Respondent to this bill of complaint, 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.

The Complainant further prays that upon the final hearing hereof, your Honor will enter a decree, awarding to him an absolute decree of divorce forever barring the bonds of matrimony existing between the said Eunice Dunlap, and your Complainant; that the care, custody and control of the said minor children, Jackie Dunlap, Charles Dunlap, and Bettie Lou Dunlap, be awarded him.

The Complainant prays for such other, further or different relief as he may be in equity and good conscience entitled to receive as in duty bound he will ever pray.

BEEBE & HALL

By:   
Solicitors for the  
Complainant

1208

Sammons & Complaint

Jacks advantage  
vs  
Emice advantage

Filed

10-6-44

R.S. Hucker  
Registrar

Jack Dunlap

vs.

Eunice Dunlap

CIRCUIT COURT OF  
Baldwin County.

IN EQUITY.

In this cause it being made to appear to the Register that on the 6th  
day of October 1945, a copy of the Bill of Complaint filed in this cause was  
sent to Eunice Dunlap

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom  
addressed," and return receipt demanded addressed to the Register of this Court; and that on the  
10th day of Oct. 1944, such receipt was duly  
received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer  
or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered,  
adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all  
things taken as confessed against the said Eunice Dunlap

Defendant

This the 15th day of Nov. 1944

*R. D. [Signature]* Register.



NO. 1208

CIRCUIT COURT OF BALDWIN  
COUNTY, ALA.

In Equity.

Jack Dunlap

VS.

Bunice Dunlap

Decree Pro Confesso After  
Notice By Registered Mail.

Filed in office this 15th day of

Nov 1944

Register

Entered in O. B. Page

MOORE PRS. CO.