

(3556)

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

CARRIE LONG

Complainant

vs.

R. F. LONG

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Waiver and Answer 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 CARRIE LONG is forever divorced from the said R. F. LONG for and on account of

Habitual drunkenness

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 R. F. Long the respondent, pay the cost herein to be taxed, for which execution may issue.

This 27<sup>th</sup> day of June, 1955.

Hubert M. Hall  
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. 3556 Page \_\_\_\_\_

**The State of Alabama**  
**BALDWIN COUNTY**

In Circuit Court, In Equity

Complainant.

Vs.

Respondent.

**DIVORCE DECREE**

**FILED**

**JUN 27 1955**

**ALICE J. DUCK, Clerk**

8581. NOTE OF TESTIMONY

Printed by The Baldwin Times, Bay Minette.

CARRIE LONG,

COMPLAINANT

vs.

R. F. LONG

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,  
Commission to take testimony.

Testimony of Carrie Long and Oneil Hendrix

and in behalf of Defendant upon Waiver and Answer

*Wm. H. H. H.*  
Solicitor for Complainant

*Wm. H. H. H.*

Register.  
Register.

No. 35576

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

vs.

**NOTE OF TESTIMONY**

Filed in Open Court this

day of **JUN 27** 19**55**, 194

**ALICE J. DUCK, Register**

Register.

Printed by The Baldwin Times, Bay Minette.

8581. NOTE OF TESTIMONY

Printed by The Baldwin Times, Bay Minette.

CARRIE LONG,

COMPLAINANT

vs.

R. F. LONG

RESPONDENT

THE STATE OF ALABAMA  
Baldwin County

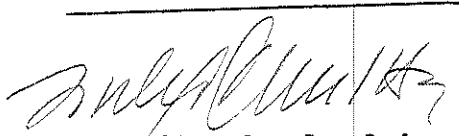
IN EQUITY  
Circuit Court of Baldwin County

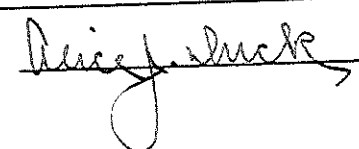
This cause is submitted in behalf of Complaint upon the original Bill of Complaint, \_\_\_\_\_

Commission to take testimony

Testimony of Carrie Long and Oneil Hendrix

and in behalf of Defendant upon \_\_\_\_\_ Waiver and Answer

  
Solicitor for Complainant

  
Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Kathryn Sute

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 Carrie Long and Oneil Hendrix

as witnesses in behalf of Carrie Long in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

~~Carrie Long~~

Carrie Long, Complainant  
and

R. F. Long Respondent

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

Witness 24th day of June, 195 5

*Anna J. Resick*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3556

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

**VS.** Complainant—

Defendant—

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER

WITNESSES: 55

JOSE L. BARK, Register

ORAL EXAMINATION.

I, Kathryn Sute, 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 Forest A. Christian

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 25th day of June, 194 55.

Kathryn Sute (L. S.)

NO. 3556 PAGE

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

vs. Complainant

Respondent.

Oral Deposition

Filed                     , 194             

, Register.

Recorded in

1955

Record

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, Register.



**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

CARRIE LONG

Complainant

VS.

R. F. LONG

Respondent

I, Kathryn Sute

as Register and Commissioner

have called and caused to come before me Carrie Long and Oneil Hendrix

witnesses named in the Requirement for Oral Examination, on the 25th day of June 194 55, at the office of Forest A. Christian, Attorney at Law in Foley, Alabama, and having first sworn said Witness es to speak the truth, the whole truth, and nothing but the truth, the said Carrie Long doth depose and say as follows:

First being duly sworn deposes and says as follows:

My name is Carrie Long. I am the complainant in the equity case of Carrie Long vs. R. F. Long. I married my husband on November 18, 1940, at Bay Minette, Alabama, and we lived together as man and wife until about 10 days ago. We had no children in this marriage. I am now 59 years old and my husband is 63, and we have had a property settlement. My husband, since our marriage, has become addicted to habitual drunkenness and it has continued to this date. For over the last year my husband has been drinking day and night. Because of this, I just cannot live with him any longer.

Carrie Long

Carrie Long

Oneil Hendrix, first being duly sworn, deposes and says as follows:

My name is Oneil Hendrix. I am over 20 years of age, and I am the son of Carrie Long, complainant in this case. I have lived in the same house with my mother and step-father for many years. During the past year my stepfather has come home drunk every day. They have lived together until about 10 days ago, when my stepfather left, and I see him around town still a drunkard.

Oneil Hendrix

Oneil Hendrix

WAIVER AND ANSWER

CARRIE LONG,	)	
COMPLAINANT	)	
VS:	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY IN
R. F. LONG,	)	EQUITY
RESPONDENT	)	

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.

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.
3. He denies each and every allegation contained in paragraph 3 of said bill of complaint and demands strict proof thereof.

*R. F. Long,*

Respondent

THE STATE OF ALABAMA, )  
BALDWIN COUNTY. )

I, Charles J. Ebert, Jr., a Notary Public in and for said County and State, do hereby certify that R. F. Long, 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 said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and official seal this the 24th day of June, 1955.

*Charles J. Ebert Jr.*  
Notary Public

Affix seal:

RECORDED  
3836

*Ans. & waiver*

FILED  
JUN 27 1955

BILL OF COMPLAINT

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STATE OF ALABAMA, )  
BALDWIN COUNTY. )

CARRIE LONG,  
COMPLAINANT

VS:

R. F. LONG,  
RESPONDENT

)  
)  
) IN THE CIRCUIT COURT  
)  
) OF BALDWIN COUNTY  
)  
) IN EQUITY  
)

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY,

Sitting in Equity:

Your complainant, Carrie Long, respectfully represents and  
shows unto your Honor:

1. That complainant is over the age of twenty-one years and  
is a resident citizen of said State and County, and has been a bona fide  
resident citizen of said State for more than 10 years next preceding the  
filing of this bill of complaint; that R. F. Long is over the age of  
twenty-one years and resides in Baldwin County, Alabama.

2. That your complainant and respondent were lawfully married  
on or about, to-wit, November 18, 1940, at Bay Minette, Alabama.

3. Your complainant further avers and alleges that the said  
respondent has, since her said marriage with him, become addicted to  
habitual drunkenness, and that said habit has continued to the filing  
of this bill.

The premises considered, your complainant makes the said  
R. F. Long a party respondent to this bill of complaint, and in order  
that complainant may have the relief herein prayed for, may it please  
your Honor to cause the State's writ of subpoena to be issued, directed  
to the said R. F. Long, commanding him to answer, plead or demur to this  
bill of complaint, within the time required by law; and that on a final  
hearing of this cause, that your Honor will enter a decree divorcing your  
complainant from said respondent, and that your Honor will grant such  
other, further and different relief as unto your Honor may seem just and  
proper, and your complainant will ever pray, etc.

**FILED**

June 27, 1945

ALICE J. BUCK, Clerk

*Carrie Long*  
Complainant

*B. J. Buck*  
Solicitor for Complainant