

(3611)

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

HELEN RUTH BROWN

Complainant

vs.

JIM J. BROWN

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ 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 Helen Ruth Brown is forever divorced from the said Jim J. Brown for and on account of 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 payment of the cost of this suit.

It is further ordered that Helen Ruth Brown the Complainant th pay the cost herein to be taxed, for which executed may issue.

This 19th day of September, 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. 3611 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

HELEN RUTH BROWN

Complainant

vs.

JIM J. BROWN

Respondent

DIVORCE DECREE

FILED

SEP 20 1955

ALICE J. BECK, Register

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

HELEN RUTH BROWN

Complainant

VS.

JIM J. BROWN

Respondent

I, Lois Howard

as Register and Commissioner

have called and caused to come before me Helen Ruth Brown and Mrs. Agnes Akers

witnesses named in the Requirement for Oral Examination, on the 7th day of September

1955, at the office of C. LeNoir Thompson

in Bay Minette

, Alabama, and having first sworn said Witness to speak the

truth, the whole truth, and nothing but the truth, the said Helen Ruth Brown and Mrs. Agnes

Akers

doth depose and say as follows:

That my name is Helen Ruth Brown, I am over the age of 21 and a resident of Alabama and have been more than one year next preceeding. On September 26, 1953 I married Jim J. Brown in Monroe County, Alabama. The Respondent, Jim J. Brown is over the age of 21 and a resident of Baldwin County, Alabama and we separated the latter part of February, 1954. He abandoned me without fault on my part and we have never lived together as husband and wife since that time. There are no children as fruits of our marriage and no property to be divided. I do not believe we will ever live together again as husband and wife and respectfully ask this Honorable Court for a divorce.

Helen Ruth Brown

That my name is Mrs. Agnes Akers, I know both parties to this cause, they are both over the age of 21 and the Defendant, Jim J. Brown resides in Baldwin County, Alabama. They have both resided in Alabama more than one year next preceeding. They were married in Monroe County, Alabama on September 26, 1953 and only lived together until the latter part of February, 1954 at which time the Respondent abandoned the Complainant, Helen Ruth Brown, without fault on her part. They have no children as fruits of this marriage and not property to be divided. I do not believe they will ever live together again as husband and wife.

Mrs. Agnes Akers

ORAL EXAMINATION

I, Lois Howard, as Register and Commissioner hereby certify that the foregoing deposition S 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 C. LeNoir Thompson

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 17th day of September, 19 55.
Lois Howard (L. S.)

No. <u>3611</u>	Page _____
The State of Alabama	
Baldwin County.	
In Circuit Court, In Equity	
HELEN RUTH BROWN	
vs.	Complainant
JIM J. BROWN	
	Respondent
Oral Deposition	
Filed _____	, 19 ____
Recorded in _____	Register
SEP 19 1955	Record
Vol. _____	Page _____
Register	

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: LOIS HOWARD

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Helen Ruth Brown and Mrs. Agnes Akers

a witnesses in behalf of Helen Ruth Brown in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Helen Ruth Brown

, Complainant

and Jim J. Brown

Respondent

on oath, to be by you administered, upon of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 17 day of Sept, 1955

Wiley J. Luck

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3611

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

HELEN RUTH BROWN

Complainant

VS.

JIM J. BROWN

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

LOIS HOWARD

FILED

WITNESSES 1955

HELEN RUTH BROWN

MRS. AGNES ARERS.

HELEN RUTH BROWN

vs.

JIM J. BROWN

THE STATE OF ALABAMA

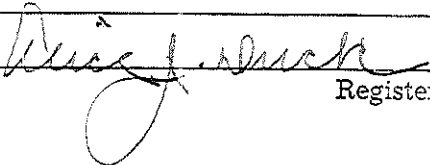
Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
Testimony of Helen Ruth Brown and Mrs. Agnes Akers.

and in behalf of Defendant upon Answer and Waiver.


Register.

No. 3611

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

HELEN RUTH BROWN

vs.

JIM J. BROWN

NOTE OF TESTIMONY

Filed in Open Court, this

day of

FILED

, 194

SEP 19 1955

ALICE J. DUCK, Register Register.

Printed by the Baldwin Times

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Jim J. Brown, 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 Helen Ruth Brown as Complainant and against Jim J. Brown as Respondent.

WITNESS my hand this the _____ day of September, 1955.

Register.

HELEN RUTH BROWN

COMPLAINANT

VS

JIM J. BROWN

RESPONDENT

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

Case No., _____

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

Your Complainant, Helen Ruth Brown, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and a resident of Alabama and have been more than one year next preceeding, the Respondent is over the age of 21 and is a resident of Baldwin County, Alabama and have been more than one year next preceeding.

2.

That your complainant and the respondent married at Monroe County, Alabama, on September 26, 1953 and lived together as husband and wife until the latter part of February, 1954.

3.

That in February, 1954, while your Complainant and Respondent were living together as husband and wife, in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

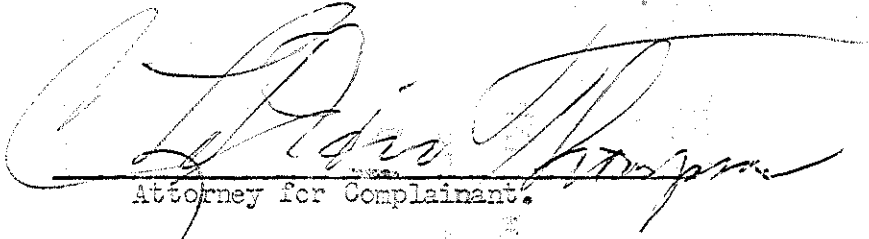
4.

There are no children as fruits of this marriage and no property to be divided.

WHEREFORE, the premises considered, the complainant prays that your Honor will by proper process make the said Jim J. Brown party respondent to this

cause of action, requiring him 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.

Complainant further prays that your Honor will upon a final hearing hereof award to her a decree of divorce forever barring the bonds of matrimony existing between your complainant and the respondent, and that she be granted such other, further, different or general relief as she may be in equity and good conscience entitled to receive.



Attorney for Complainant.

703611
RECORDED

HELEN RUTH BROWN

COMPLAINANT

VS

JIM J. BROWN

RESPONDENT

SUMMONS AND COMPLAINT

FILED

SEP 19 1955

Alice L. Duck, Register

From the law office of

C. LeNoir Thompson
Attorney-At-Law
Bay Minette, Alabama

HELEN RUTH BROWN

COMPLAINANT

VS

JIM J. BROWN

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY.

Now comes the Respondent and accepted service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, 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 Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Jim J. Brown

STATE OF ALABAMA
BALDWIN COUNTY

I, *C. L. G. Thompson*, a Notary Public, in and for said County, in said State, hereby certify that Jim J. Brown, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that, being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 17 day of Sept, 1955.

C. L. G. Thompson
Notary Public, Baldwin County, Alabama.

RECORDED

72361A

HELEN RUTH BROWN

COMPLAINANT

VS

JIM J. BROWN

RESPONDENT

ANSWER AND WAIVER

FILED

SEP 19 1955

ALICE L. DUCK, Register

From the law offices of
C. LeNoir Thompson
Attorney-At-Law
Bay Minette, Alabama

