

YOLAN JENDRAS,
Complainant
Vs.
RAYMOND JENDRAS,
Defendant

IN THE CIRCUIT COURT
OF BALDWIN COUNTY,
ALABAMA
IN EQUITY

ANSWER AND WAIVER

Comes the Defendant in the above entitled cause and for answer to the Bill of Complaint therein admits the allegations as to the ages, residences and marriage and denies each and every other allegation of said Bill of Complaint and demands strict proof thereof.

I agree that the testimony in this cause may be taken by deposition on oral examination, and waive notice of the time and place of the taking such testimony and agree that this cause may be submitted for final decree at any time. I waive all notices to which I may be entitled by law in this cause.

Yolan Jendras
Raymond Jendras
RAYMOND JENDRAS, Defendant

Note: The space below is intended for "Agreements Between the Parties".

It is agreed by and between the parties hereto that Erin L. Gibson may take the testimony in this cause, either with or without the issuance of a commission.

It is further agreed by and between the parties hereto that the respondent, Raymond Jendras, shall not be required to make any payments to the complainant for the support of said complainant by any decree in this action.

Raymond Jendras
RAYMOND JENDRAS, Respondent
Yolan Jendras

Maurice A. Downing
Attorney for Complainant
Wm M. Clarke
Attorney for Respondent

STATE OF NEW YORK

BOOK 018 PAGE 466

COUNTY OF NEW YORK

I, *Jerome M. Stember*, a Notary Public in and for said State and County, do hereby certify that RAYMOND JENDRAS, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me this day, that being informed of the contents of the instrument, executed the same voluntarily on the day same bears date.

Witness by hand and seal this *20* day of *September* 1955.

Jerome M. Stember
Notary Public

JEROME M. STEMBER
Notary Public, State of New York
No. 31-3833850
Qualified in New York County
Commission Expires March 30, 1957

STATE OF NEW YORK

COUNTY OF NEW YORK

YOLAN JENDRAS,	*	IN THE CIRCUIT COURT OF
Complainant,	*	BALDWIN COUNTY, ALABAMA
Vs.	*	IN EQUITY
RAYMOND JENDRAS,	*	
Plaintiff.	*	NO. <u>3615</u>

TO THE HONORABLE HUBERT HALL, JUDGE OF SAID COURT, SITTING IN EQUITY:

Comes your complainant, Yolan Jendras, in the above styled cause and shows unto Your Honor and unto this Honorable Court as follows:

ONE

That your complainant and the respondent are both over the age of 21 years that the complainant is a resident of Baldwin County, Alabama, but that the respondent is a non-resident of the state of Alabama, and is a resident of New York City, New York.

TWO

That the complainant and respondent were lawfully married to each other in New York City on the 9th day of May, 1953, and lived together as husband and wife from that time until September 4, 1954, at which time they separated and have not lived or cohabited with each other since that time.

THREE

That on September 4, 1954, the respondent did commit actual violence on the person of the complainant attended with danger to her life or health, or from his conduct there is reasonable apprehension of such violence and by reason thereof she has not lived or cohabited with him since that time.

PRAYER FOR PROCESS

The premises considered, your petitioner prays that the

Honorable Court will take jurisdiction of this cause and will give the respondent notice of this case according to the laws and rules of this Court and will set a date for a hearing, and will make a further order making Raymond Jendras a party respondent to this Bill of Complaint, and that appropriate process be issued to him requiring him to plead, answer or demur to this Bill of Complaint within the time required by law.

PRAYER FOR RELIEF

Complainant prays unto this Honorable Court that upon a hearing of this cause it will completely and entirely sever the bonds of matrimony now existing between the complainant and the respondent and grant to the complainant the right to remarry within the time required by law, that her maiden name, Yolan Salamon, that she had before her marriage to the respondent be returned to her and she prays for such other further and different relief as she may be entitled to receive, the premises considered.

FILED

Sept. 20, 1955

ALICE I. DUCK, Register

Yolan Jendras
Complainant

Maureen A. Durning
Solicitor for Complainant

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, }

Baldwin County.

Circuit Court, Baldwin County

No. 3615

Sept. TERM, 1955

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

Raymond Jendras

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in

the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

RAYMOND JENDRAS

, Defendant

by YOLAN JENDRAS

, Plaintiff

Witness my hand this 20th. day of Sept. 1955.

, Clerk

BOOK 018 PAGE 464

RECORDED

No. 3615 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

YOIAN JENDRAS

Plaintiffs

vs.

RAYMOND JENDRAS

Defendants

Summons and Complaint

Filed Sept. 20th. 1955.

Clerk

Maurice A. Downing

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

Received In Office

19

Sheriff

I have executed this summons

this 19

by leaving a copy with

Sheriff

Deputy Sheriff

YOLAN JENDRAS,

Complainant

No. _____ Vs. _____

RAYMOND JENDRAS,

Defendant

BALDWIN

CIRCUIT COURT OF MOBILE

COUNTY, ALABAMA

IN EQUITY

DEMAND FOR ORAL EXAMINATION

The State of Alabama, {
Mobile County }

The complainant requests the oral examination of the following named witnesses
on her behalf, viz.:

Florence Telish, 275 Gunn Road, Bronz, New York

New York

said witnesses reside in the County of New York, State of ~~Alabama~~

Helen F. O'Neill who reside at 123 Lyon Street, Valley Stream, N. Y.

is suggested as a suitable person to be appointed Commissioner to take deposition of said witness
on such oral examination.

Filed _____

W. ELSWORTH HAUGHTON, Register

Solicitor for

James P. Dewing
Complainant

No.

CIRCUIT COURT OF MOBILE COUNTY

Mobile, Alabama

Vs.

DEMAND FOR ORAL EXAMINATION

FILE

SEP 21 1955

ALICE J. DUCK, Register

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama, {

Baldwin County.

Circuit Court, Baldwin County

No. 3615

Sept.

TERM, 1955

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon

RAYMOND JENDRAS

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against

RAYMOND JENDRAS

, Defendant

by

TOLAN JENDRAS

, Plaintiff

Witness my hand this 20th day of Sept. 1955.

, Clerk

No. 615

Page _____

The State of Alabama

Baldwin County

CIRCUIT COURT

YOIAN JENDRAS

Plaintiff's

vs.

RAYMOND JENDRAS

Defendants

Summons and Complaint

Filed Sept. 20th. 1955.

Clerk

Maurice A. Downing

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at _____

Received In Office

19____

_____, Sheriff

I have executed this summons

this _____ 19____

by leaving a copy with _____

Sheriff

Deputy Sheriff

YOLAN JENDRAS,	*	IN THE CIRCUIT COURT OF
Complainant,	*	BALDWIN COUNTY, ALABAMA
Vs.	*	IN EQUITY
RAYMOND JENDRAS,	*	
Plaintiff.	*	NO. <u>3615</u>

TO THE HONORABLE HUBERT HALL, JUDGE OF SAID COURT, SITTING IN EQUITY:

Comes your complainant, Yolana Jendras, in the above styled cause and shows unto Your Honor and unto this Honorable Court as follows:

ONE

That your complainant and the respondent are both over the age of 21 years; that the complainant is a resident of Baldwin County, Alabama, but that the respondent is a non-resident of the state of Alabama, and is a resident of New York City, New York.

TWO

That the complainant and respondent were lawfully married to each other in New York City on the 9th day of May, 1953, and lived together as husband and wife from that time until September 4, 1954, at which time they separated and have not lived or cohabited with each other since that time.

THREE

That on September 4, 1954, the respondent did commit actual violence on the person of the complainant attended with danger to her life or health, or from his conduct there is reasonable apprehension of such violence and by reason thereof she has not lived or cohabited with him since that time.

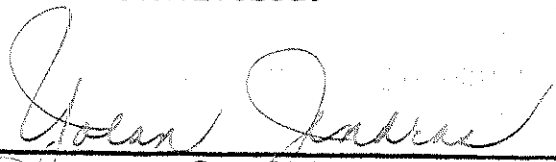
PRAYER FOR PROCESS

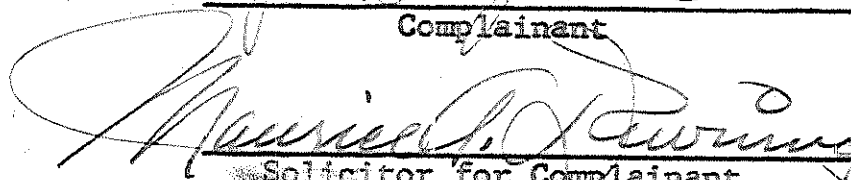
The premises considered, your petitioner prays that the

Honorable Court will take jurisdiction of this cause and will give the respondent notice of this case according to the laws and rules of this Court and will set a date for a hearing, and will make a further order making Raymond Jendras a party respondent to this Bill of Complaint; and that appropriate process be issued to him requiring him to plead, answer or demur to this Bill of Complaint within the time required by law.

PRAYER FOR RELIEF

Complainant prays unto this Honorable Court that upon a hearing of this cause it will completely and entirely sever the bonds of matrimony now existing between the complainant and the respondent and grant to the complainant the right to remarry within the time required by law; that her maiden name, Yolan Salamon, that she had before her marriage to the respondent be returned to her and she prays for such other further and different relief as she may be entitled to receive, the premises considered.


Complainant


Solicitor for Complainant

THE STATE OF ALABAMA, MOBILE COUNTY

YOLAN JENDRAS
Complainant,
No. vs.
RAYMOND JENDRAS
Defendant

CIRCUIT COURT
IN EQUITY
~~IN MOBILE COUNTY~~
IN BALDWIN COUNTY
ALABAMA

DECREE OF DIVORCE

This cause is submitted for decree on the pleadings, decree pro confesso and the testimony as shown by the note of submission on file, and on consideration, it is ordered, adjudged and decreed by the Court that the Complainant is entitled to relief, and that the bonds of matrimony heretofore existing between the Complainant and the Defendant be and the same are henceforth dissolved and annulled.

It is further ordered and decreed that Complainant and Defendant be, and hereby are permitted to again contract marriage, subject to such provisions of the law as regulate the marriage of divorced persons, and in no event before the expiration of sixty days after the rendition of this decree.

It is further ORDERED and DECREED THAT Complainant be, and is hereby permitted to assume her maiden name which is YOLAN SALAMON.

It is further ordered that YOLAN (JENDRAS) SALAMON
pay the cost of this suit, for which execution may issue
Dated, September 28 1955
Hubert M. Hall
Judge

YOLAN JENDRAS

No. _____ VS. }

RAYMOND JENDRAS

IN THE CIRCUIT COURT OF
BALDWIN COUNTY
ALABAMA

IN EQUITY

ORDER OF SUBMISSION

This cause coming on to be heard, is submitted for decree on the pleadings and on the proof as noted.

Dated, September 24 1955

NOTE OF EVIDENCE

At the hearing of this cause the following note of evidence was taken to wit:

FOR COMPLAINANT

1. Bill of complaint.
2. Answer and Waiver and Agreement of the parties.
3. Commission to Helen F. O'Neill
4. Testimony of Yolán Jendras, Complainant,
5. Testimony of Miss Florence Telish, witness for Complainant.

FILED

9-26-55'

W. J. Clark Register

Maurice P. Downing
Solicitor-for Complainant

FOR RESPONDENT

William Clarke

Solicitor-for Respondent

YOLAN JENDRAS,	*	IN THE CIRCUIT COURT OF
Complainant,	*	BALDWIN COUNTY, ALABAMA
Vs.	*	IN EQUITY
RAYMOND JENDRAS,	*	
Respondent.	*	NO. _____

TESTIMONY OF YOLAN JENDRAS, COMPLAINANT, WITNESS IN HER OWN BEHALF:

Yolan Jendras, being at witness examined in her own behalf in this cause, after being first duly sworn to speak the truth, the whole truth and nothing but the truth, testified as follows:

I reside at 158 Magnolia Avenue, Fairhope, Baldwin County, Alabama, and am the lawful wife of Raymond Jendras, having been lawfully married to him in New York City on the 9th day of May, 1953. Both my husband and myself are over the age of 21 years, and I am a resident of Baldwin County, and he is a resident of the State of New York. After our marriage he and I lived together as husband and wife until on or about September 4, 1954, which was Labor Day. On said date my husband, the respondent, did commit actual violence on my person attended with danger to my life or health because on that day he had previously told me he was going to visit his family, and he met me at the entrance to a subway station and told me to come home with him at once. I had made plans to visit a girl friend who was at the time confined to the hospital having given birth to a child the day before. I was with some girls, friends of mine, on our way to the hospital among whom was Miss Florence Telish. I tried to reason with him but he became so angry he tried to hit and slap me about the face and head and arms and as I tried to get away from him he followed me and hit me with his fists and cursed me. Miss Telish tried to get him to stop hitting me and said she would call the police. My friends left me and got on the subway except Miss Telish who went with me to my home, where I gathered my effects and left my husband. This was not the first time that he had beat me but it got to the point where on any small provocation he would become

violent and begin to hit and punch me. In fact I had to get a job out of town and left the state so he would leave me alone. I would like to have my name changed from Yolan Jendras to Yolan Salamon, the name I had before I was married, and I would like to have the right to remarry in case I should want to do so, although I have no intention of doing so at the present time.

Yolan Jendras

YOLAN JENDRAS,

Complainant,

VS:

RAYMOND JENDRAS,

Respondent.

*

*

*

*

IN THE CIRCUIT COURT OF

BALWIN COUNTY, ALABAMA

IN EQUITY

NO. _____

Deposition of Yolán Jendras, complainant in the above styled cause, a witness examined in her own behalf in the office of Maurice A. Downing, 507 First National Bank Building, Mobile, Alabama, at 3:30 p.m. on September 21, 1955, said witness having been examined on direct examination.

The respondent not having appeared, had no representation at said hearing, the same being by oral examination of the above witness.

Erin L. Gibson
Commissioner

C E R T I F I C A T E

I, Erin L. Gibson, hereby certify that I acted as commissioner in this cause, and I hereby certify that I acted as commissioner under an agreement by and between the complainant and the respondent and that under said agreement the issuance of a commission by the Court was expressly waived by the complainant and the respondent.

I, as commissioner under said agreement, after having given Maurice A. Downing, Solicitor for the complainant, all proper notices of the time and place of the taking of the deposition, the respondent having expressly waived all notices in the Answer and Waiver filed in this cause, called Yolán Jendras, a witness in her own behalf, to come before me at the office of the said Maurice A. Downing, 507 First National Bank Building, Mobile, Alabama, at 3:30 p.m. on the 21st day of September, 1955, and after having been made known to me, and sworn to speak the truth, the whole truth and nothing but the truth, and in answer to direct interrogatories propounded to her, she testified as hereinafter set out, and that testimony was by me reduced in writing to as nearly as might be the identical language of said witness, and having been read over by her and to her by me, she in my presence and in the presence of her solicitor of record, subscribed her name to said testimony as correct as testified to by her. The respondent not having appeared, had not representation at said hearing.

I further certify that I am not of counsel or of kin to any of the parties in this cause and I am not in anywise interested in the outcome of the result thereof.

Erin L. Gibson
Commissioner

----- X
YOLAN JENDRAS,

Complainant,

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

- against -

IN EQUITY

RAYMOND JENDRAS,

Respondent.

No. _____

----- X
Deposition of Miss FLORENCE TELISH, witness
examined in behalf of the complainant at 11 Park Place, New
York 7, New York, at 3:00 o'clock in the afternoon on
September 22nd, 1955, said witness having been examined on
direct examination.

The respondent not having appeared had no represen-
tation at said hearing, the same being by oral examination
of the above witness.

Helen F. O'Neill
Commissioner

C E R T I F I C A T E

I, HELEN F. O'NEILL, hereby certify that under a commission issued to me by the Circuit Court of Baldwin County, Alabama, I acted as commissioner in this cause and I, as commissioner, after having given all proper notices of the time and place, called Miss FLORENCE TELISH, witness in behalf of the complainant in this cause, to come before me at my place of business, 11 Park Place, New York 7, New York, at 3:00 o'clock in the afternoon on the 22nd day of September, 1955, and after being made known to me and sworn to speak the truth, the whole truth and nothing but the truth, and in answer to direct interrogatories propounded to her by me, she testified as is hereinafter set out, and her testimony was reduced in writing to as nearly as might be the identical language of said witness, and having been read over by her and to her by me, she in my presence, has subscribed her name to said testimony as correct as testified to by her.

The respondent not having appeared, had no representation at said hearing.

I further certify that I am not of counsel or of kin to any of the parties to this cause and I am not in anywise interested in outcome of the result thereof. I further certify that said testimony is true and correct as given to me by said witness.

Helen F. O'Neill
Commissioner

----- x
YOLAN JENDRAS,

Complainant,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

- against -

IN EQUITY

RAYMOND JENDRAS,

Respondent.

No. _____
----- x

TESTIMONY OF MISS FLORENCE TELISH, WITNESS IN BEHALF OF
COMPLAINANT:

Miss FLORENCE TELISH, being a witness examined in
behalf of the complainant in this cause, after having been
sworn to speak the truth, the whole truth and nothing but
the truth, testified as follows:

My name is FLORENCE TELISH and I reside at 275
East Gun Hill Road, Bronx, New York, New York. I knew Mrs.
YOLAN JENDRAS before she was married and I recall that on
May 9, 1953, she was then YOLAN SALAMON, married RAYMOND
JENDRAS at St. Johns Church in New York; and I know that
they lived together as husband and wife from that time until
Labor Day, 1954. I do not recall the exact date, but I know
it was Labor Day. I recall that MRS. JENDRAS had told me her
husband was going to visit his family on Labor Day and that
she was going to stay home, so we planned to visit a friend
who was in the hospital. MRS. JENDRAS, myself and some other
girls were on the way to the hospital and Mr. RAYMOND JENDRAS
came up and accosted us at a subway station. He grabbed
MRS. JENDRAS by the arm and told her to come home. She
tried to explain that we were going to the hospital when he

began to curse and hit her and slap and punch her. She ran from him but he followed her and hit her a number of times. I told him I would call the police but she told me not to do so. She asked me if I would go home with her to get her clothes and personal belongings. We walked away and MR. JENDRAS followed us all the way home. I know that MR. and MRS. JENDRAS are both over the age of 21 years, and that since that time MRS. JENDRAS has moved to Alabama. I believe MR. JENDRAS, at this time, is living in New York with his parents but I have not seen him.

I believe that MRS. JENDRAS should have a divorce from this man because of his cruel and inhuman treatment.


FLORENCE TELISH

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Helen F. O'Neill

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 Miss Florence Telish

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

YOLAN JENDRAS

is the Complainant
and

RAYMOND JENDRAS is the Respondent

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

Witness 21st day of September, 195⁵

Reice J. Ducker
Register.

Commissioner's Fee, \$

Witness' Fees, \$