

2227

STATE OF ALABAMA }
BALDWIN COUNTY }

TO ANY SHERIFF OF THE STATE OF ALABAMA }

You are hereby commanded to summon CARLOS LORD, 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 ILA MAE LORD, as Complainant, and against CARLOS LORD, as Respondent.

WITNESS my hand this 27th day of January, 1949.

Herice J. Duck
Register

ILA MAE LORD
COMPLAINANT
VS
CARLOS LORD
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO HON. TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA:

Your Complainant, ILA MAE LORD, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide residents of Baldwin County of the State of Alabama, and over twenty-one years of age.

2.

That your Complainant and the Respondent married in Lucedale, Mississippi, on October 8th, 1946; that they lived together as husband and wife, until on to-wit, November 19th, 1948, when your Complainant for the reasons hereinafter set out, was forced to abandon living with the Respondent.

3.

That on to-wit, November 19th, 1948, the Respondent threatened

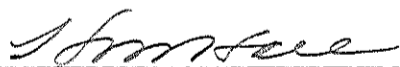
cursed, and abused your Complainant, and did actual violence to her person by striking her with a "blackjack", which necessary endangered her life and health; that the Respondent has since that time threatened to take the life of your Complainant; that the conduct of the Respondent is such as to give your Complainant every reasonable apprehension to believe, and she does actually believe that if she continues to live with him he will carry out his threats and do further violence to her person, which will necessary endanger her life and health.

4.

That your Complainant and the Respondent have no childred; that they have no community property.

WHEREFORE THE premises considered your Complainant prays that your Honor will by proper process make the said CARLOS LORD party respondent to this bill of complaint, 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 upon a final hearing hereof your Honor will make and enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that she be granted such other further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for Complainant.

Respondent can be found at
112 A First Street, Blakley
Island, Mobile, Alabama.

702227

RECORDED

ELA MAE LORD

COMPLAINANT

VS

CARLOS LORD

RESPONDENT

COMPLAINT

FILED

JAN 27 1949

ALICE J. DUCK, Register

THE STATE OF ALABAMA, }
BALDWIN COUNTY.

Circuit Court

TO: LOUISE MORRIS

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 IDA MAE LORD

as witnesses in behalf of IDA MAE LORD in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein IDA MAE LORD

_____, Complainant
and CARLOS LORD

_____, Respondent

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

Witness 25th day of January, 1949

W. J. Lord
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 2227

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

ILA MAE LORD

Complainant

VS.

CARLOS LORD

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Louise Morris

WITNESSES:

Alimony, Loss & _____

Compensation, Loss & _____

consistent speed under your hand.

on need to be by you experienced above

and

Commissioner

Commissioner

Witness

Witness

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

IDA MAE LORD, Complainant

vs.

CARLOS LORD, 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 IDA MAE LORD is forever divorced from the said CARLOS LORD 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 IDA MAE LORD the Complainant pay the cost herein to be taxed, for which execution may issue.

This 28th day of January, 1949

Walter J. Marshall
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. 2227 Page 25

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

JLA MAE LORD

Complainant

vs.

CARLOS LORD

Respondent

DIVORCE DECREE

FILED
JAN 29 1949
ALICE J. DUCK, Registrar

ILA MAE LORD

COMPLAINANT

VS

CARLOS LORD

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

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

The Respondent admits the allegations, contained in the bill of complaint, as to ages, residences and marriage, but denies all allegations as to cruelty, and demands strict proof of the same.

The Respondent waives notice of the time of taking 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 notice.

Carlos Lord

STATE OF ALABAMA
Baldwin COUNTY

I, H. C. Miles, Justice of Peace, a Notary Public, in and for said County, in said State, hereby certify that Carlos Lord, 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 22 day of January, 1949.

H. C. Miles
Notary Public, Baldwin County, Alabama.
Justice of the Peace

ILIA MAE LORD

vs.

CARLOS LORD

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 of Respondent and testimony of Complainant.

and in behalf of Defendant upon _____

H. M. HALL

Annie J. Smith
Register.

No. 2227.....

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

ILA MAE LORD

vs.

CARLOS LORD

NOTE OF TESTIMONY

Filed in Open Court this 27th.....

day of January, 1949.....

Alvin J. Welch
Register.

Printed By The Baldwin Times

THE STATE OF ALABAMA }
Baldwin County }

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

IDA MAE LORD

COMPLAINANT

vs.

CARLOS LORD

RESPONDENT

I, Louise Morris

as Register and Commissioner

have called and caused to come before me Ida Mae Lord

witness named in the requirement for Oral Examination, on the 25 day of January

1949, at the office of H. M. Hall

in Baldwin County, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Ida Mae Lord

doth depose and say as follows:

My name is IDA MAE LORD. I am over twenty one years of age, and a bona fide resident of Baldwin County, Alabama. I have been a resident all of my life.

The Respondent CARLOS LORD, is over twenty one years of age, and a bona fide resident of Baldwin County, Alabama. The Respondent and I married in Lucedale, Mississippi, on October 8, 1946.

We lived together as husband and wife until on to-wit, November 19, 1948. The Respondent on November 19, 1948, and on various occasions prior thereto, cursed, threatened and abused me, and committed actual violence to my person by striking me, which necessarily endanger my life and health. The Respondent about November 19, 1948, struck me with a "blackjack,". The conduct of the Respondent, toward me is such as to give me every reasonable apprehension to believe, and I do actually believe that if I continued to live with him, he will carry out his threats and do further violence to my person, which will necessarily endanger my life and health.

The Respondent and I have never been able to get along. His conduct toward me, has been such, during our married life, and has got to the point to render it absolutely impossible for us to live together as husband and wife.

The Respondent and I have no children, nor do we have any property.

The Respondent during the past twelve months has been spending practically all of his time in Mobile, and comes hom some week ends, and on practically every visit home, he has been drinking, and threatens and abuses me. I have since last February been compelled to work for myself.

I know that conditions are such, and I have done my best to overcome them, however, there is no chance for the Respondent and I do live together as husband and wife.

Ida Mae Lord.

I, Louise Morris as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness and read over to her and she 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 or had proof made before me of the identity of said witness; 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 25 day of January 1949.

Louise Morris (L. S.)

No. 2227

Page _____

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

ELA MAE LORD

COMPLAINANT

VS.

CARLOS LORD

RESPONDENT

ORAL DEPOSITION

Filed 1-27, 1949

Willie L. Leuck Register.

RECORDED IN

Record

Vol. _____ Page _____

_____, Register

2227