THE STATE OF ALABAMA **Baldwin County**

ESSIE ANKUM, Complainant ROOSEVELT ANKTIM

Respondent.

IN EQUITY Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _ Summons, Motion for Decree Pro Confesso on Personal Service, Decree Pro Confesso on Personal Service and the testimony of Essie Anhum

and in behalf of Defendant upon_

and Francis B. Smith.

Served- which

THE STATE OF ALABAMA Baldwin County	
IN EQUITY Circuit Court of Baldwin County	
Complainant,	
vs. ROOSEVELT ANKUM	
Respondent.	
NOTE OF TESTIMONY	
day of Anne, 1949. Alice Lluck Register. Printed By The Baldwin Times	
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No.

Register.

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Vs. ROOSEVELT	ANKUM		" _"	Equity No.	2232
	Responde	, ent.	LII.	Equity 140.	
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	DECREE PRO	CONFESSO	ON PERSONA	L SERVICE.	
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In this cause,	it appears to the	Register, tha	at service was h	ad on the Resp	ondent
Roosevelt	Ankum	<u> </u>			
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And it further	appears to the F	Register, that	the said Roc	sevelt Ank	tum
			, the Responde	nt_, having t	o the date hereof,
failed to plead, der	mur to or answer	the Bill of C	omplaint filed i	n this cause, it	is now, therefore,
e agreeding the properties of the section of the se	Hybart, Cha	son & Sto			
on motion of —	11,5001 09. 01101	0012 @ 000		<u> </u>	——— Solicitors
for Complainant, o	ordered, and decr	eed by the F	egister that the	Rill of Complet	int in this cause be,
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and it hereby is, in	all things taken	as confessed	against the sa	id Booseve	olt Ankum
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CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY

ESSIE ANKUM

Complainant,

Vs.

ROOSEVELT ANKUM

Respondent.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

Issued this 24day of May

194___9_.

Baldwin Times Print

Witness' Fees, \$__

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joint, to car before you and examine	<u> </u>					
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THE	STATE OF A Baldwin Co	LABAMA unty
C	RCUIT C	
ESSIE	ANKUM	
	VS.	Complainant
:		
ROOSE	ELT ANKUM	
		Defendant_
OMMISS	SION TO TAKE	DEPOSITION
	COMMISSIONE	PR:
	WITNESSES:	

THE STATE OF ALABAMA, Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

ESSIE ANKUM	Complainant
VS. ROOSEVELT ANKUM	Domandant
I, Alice L. Miller	Respondent
ax Register xand Commissioner	
have called and caused to come before me _ESS	ie Ankum and Francis B. Smith
Programment of the contract that the contract of the contract	- Valenting of the Control of the Co
witness es named in the Requirement for Oral 1 194 9, at the office of Hybart, Chason	& Stone
in Bay Minette , Alabama, and havi	ng first sworn said Witnesses to speak the
truth, the whole truth, and nothing but the truth, to B. Smith depose and s	he said ESSIE Ankum and Francis

That Essie Ankum and Roosevelt Ankum are both over the age of twenty-one years of age; that Essie Ankum has lived in Baldwin County, Alabama, all of her life, and Roosevelt Ankum is a resident of Mobile, Alabama. That Essie Ankum and Roosevelt Ankum were married on heretofore, to-wit, September 1939, and they lived together in Baldwin County, Alabama, as man and wife until in January, 1948, when Roosevelt Ankum voluntarily abandoned Essie Ankum and has failed and refused to live with her since that time; that they have not lived together as man and wife for more than one year next immediately preceding the filing of her Bill of Complaint on February 1, 1949. That the said Roosevelt Ankum abandoned the said Essie Ankum without just cause or legal excuse.

Essier ankum!. Francis B. Smith

ORAL EXAMINATION.

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	THE STATE OF ALABAMA BALDWIN COUNTY
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deposition—on Oral Examidation—on Oral Examiand read over to _meand read over to _me_lace herein mentioned; the parties to said Oral Examination in my hand and seal, this—3.	Filed 6-1, 1949
Miller sition—on (Chason herein me herein me ny of the p Oral Exam and and se	leice f. houch, Register.
deposition deposition and read on Chas place herei to any of said Oral my hand a	Recorded in Record
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No. 2232 CIRCUIT COURT IN EQUITY.

ESSIE ANKUM Complainant

ROOSEVELT ANKUM

Defendant.

Motion is hereby made for a Decree Pro Confesso against Roosevelt Ankum

to this date.

This 24th day of May 19.49

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The	State o	f Alabama,
CIRC	CUIT COUI	RT, IN EQUITY
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		Respondent.
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Moore Printing Company, Bay Minette, Ala.

STATE OF ALABAMA BALDWIN COUNTY

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA.

IN EQUITY.

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons Roosevelt Ankum 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 Essie Ankum, as Complainant against Roosevelt Ankum, as Respondent.

Witness my hand this first day of February, 1949.

Alice Lucko.
Register.

ESSIE ANKUM,

Complainant,

VS.

ROOSEVELT ANKUM,

Respondent.

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

Comes your Complainant Essie Ankum and files this her Bill of Complaint for divorce against Roosevelt Ankum and shows unto your Honor as follows:

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FIRST:

That your Complainant is over the age of twenty-one years and a resident of Tensaw in Baldwin County, Alabama, where she has resided all of her life; that the Respondent is over the age of twenty-one years and is a resident of Mobile, Alabama, residing on Chinqupin Street.

SECOND:

That your Complainant and Respondent were married on heretofore, to-wit: September, 1939, and they lived together in Baldwin
County, Alabama, as man and wife until in January, 1948, when the
Respondent voluntarily abandoned your Complainant and has failed and
refused to live with her since that time; that your Complainant and
Respondent have not lived together as man and wife for more than one
year next immediately preceding the filing of this Bill of
Complainant.

PRAYER FOR PROCESS AND RELIEF.

The premises considered your Complainant prays that the above named Roosevelt Ankum be made a Defendant to this Bill of Complaint by the usual Writ or process of this Honorable Court, requiring him to plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided; that upon a final hearing of this cause your Honor will grant unto your Complainant an absolute divorce from said Respondent and that your Honor will order and decree that your Complainant be allowed to remarry if she sees fit. Should your Complainant be mistaken in the relief prayed for that there be granted to her such other, further, different and general relief to which she may be entitled and as in duty bound she will ever pray.

Esse Unkern Complainant.

Hybart, Chason & Stone Attorneys for Complainant.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

	SIE ANKUM	, Complainant
	vs.	
	OSEVELT ANKUM	, Respondent
		ed upon Bill of Complaint, Decree Pro Conf
		estimony as noted by the Register, and u
It is therefore ordered	, adjudged and decreed by	the Court that the bonds of matrimony h
		nt be, and the same are hereby, dissolved,
that the said <u>Essie A</u>	nkum	is forever divorced from
said Roosevelt Ankur	<u>m</u>	for and on account of
abandonment		
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