

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Laura Mae CooperCross-, Complainant

vs.

John B. CooperCross-, 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 Laura Mae Cooper is forever divorced from the said John B. Cooper for and on account of

Cruelty

It is further ordered, adjudged and decreed by the Court that Laura Mae Cooper shall have the care, custody and control of the infant daughter, Barbara Eileen Cooper.

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 John B. Cooper the _____ pay the cost herein to be taxed, for which execution may issue.

This 14th day of July, 1949---

Isfair J. Mallbury Jr.
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. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

JUL 15 1949

ARTHUR J. DUCK, Register

JOHN B. COOPER

COMPLAINANT

VS.

LAURA MAY COOPER

RESPONDENT

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IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. _____

This cause coming on to be heard was submitted upon the Complainant's bill of complaint for an annulment of the marriage between the Complainant and the Respondent on January 8th, 1949, and the pleadings and testimony as noted by the Register.

The Court after understanding and considering the matter is of the opinion that the marriage between the Complainant and the Respondent was void, and that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court, that the marriage between the Complainant and the Respondent be and the same is hereby annulled and that the Complainant is forever released and discharged from any and all obligations and duties arising from said marriage.

IT IS FURTHER ORDERED that the Complainant pay the cost herein for which execution may issue.

Dated this the ____ day of July, 1949.

Judge

JOHN B. COOPER

COMPLAINANT

VS.

LAURA MAY COOPER

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. _____

Now comes the Complainant-cross Respondent; and for answer to the Respondent's cross-bill, says:

1.

He admits the allegations as to ages, residences, and marriage.

2.

He denies all allegations as to cruelty, and demands strict proof of the same.

3.

He denies all other allegations contained in the cross-bill, and demands strict proof of the same.

The Complainant, cross-Respondent waives notice of the time of taking testimony on behalf of the Respondent; the right to cross examine Complainant's witnesses; and agrees that this cause be submitted forthwith for final decree without notice.


Solicitor for the Complainant-Cross Respondent

THE STATE OF ALABAMA, }
BALDWIN COUNTY. }

Circuit Court

TO: NITA ANN HALL

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do auth orize you, at such time and place as you may appoint, to call before you and examine Laura Mae Cooper and
Celeste White

as witnesses in behalf of Laura Mae Cooper in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein John B. Cooper

_____, Complainant
and Laura Mae Cooper

_____, Respondent

on oath, to be by you administered, upon Nita Ann Hall
to take and certify the deposition of the witnesss and return the same to our Court, with all
convenient speed, under your hand.

Witness 14 day of July, 194 9

Wm. J. Leuck
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JOHN B. COOPER

Complainant

VS.

LAURA MAE COOPER

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

NITA ANN HALL

WITNESSES:

CELESTE WHITE

JOHN B. COOPER

vs.

LAURA MAE COOPER

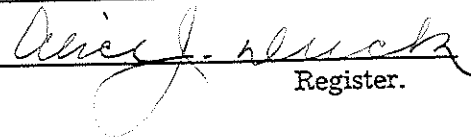
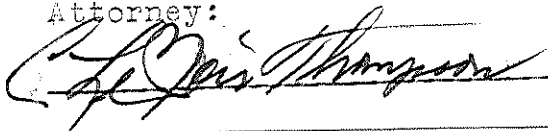
THE STATE OF ALABAMA
Baldwin CountyIN EQUITY
Circuit Court of Baldwin County

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

Testimony of Complainant

_____and in behalf of Defendant upon Answer and Waiver

Attorney:


Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

JOHN B. COOPER

vs.

LAURA MAE COOPER

NOTE OF TESTIMONY

Filed in Open Court this 14th

day of July, 1949

W. J. L. L. L.

Register.

Printed By The Baldwin Times

JOHN B. COOPER
COMPLAINANT

VS.

LAURA MAY COOPER
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. _____

This cause coming on to be heard was submitted upon the Complainant's bill of complaint for an annulment of the marriage between the Complainant and the Respondent on January 8th, 1949, and the pleadings and testimony as noted by the Register.

The Court after understanding and considering the matter and the opinion that the marriage between the Complainant and the Respondent was void, and that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court, that the marriage between the Complainant and the Respondent be and the same is hereby annulled and that the Complainant is forever released and discharged from any and all obligations and duties arising from said marriage.

IT IS FURTHER ORDERED that the Complainant pay the cost herein for which execution may issue.

Dated this the _____ day of July, 1949.

Judge

STATE OF ALABAMA
BALDWIN COUNTY

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that the foregoing is a full, true, correct and complete copy of the decree in the matter of John B. Cooper Complainant, vs. Laura May Cooper, Respondent, as the same appears on file in my office.

Witness my hand and seal of office on this the _____ day of July, 1949.

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 JOHN E. COOPER

as witnesses in behalf of JOHN E. COOPER in a cause pending in our Circuit Court in Baldwin County, of said State, wherein JOHN E. COOPER

, Complainant
and LAURA MAY COOPER

Respondent

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

Witness 9 day of July, 1949

Alice J. Duck
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

JOHN B. COOPER

Complainant

VS.

LAURA MAY COOPER

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

John B. COOPER

Complainant

VS.

Laura Mae COOPER

Respondent

I, NITA ANN HALL

as Register and Commissioner

have called and caused to come before me LAURA MAE COOPER AND

witness S named in the Requirement for Oral Examination, on the 14 day of July 1949, at the office of C. LeNoir Thompson in Bay Minette, Alabama, and having first sworn said Witness S to speak the truth, the whole truth, and nothing but the truth, the said Laura Mae Cooper and doth depose and say as follows:

That my name is Laura Mae Cooper, I am a bona fide resident of Baldwin County, Alabama and am seventeen years of age.

Cross-

The Respondent, John B. Cooper, is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama.

Cross-

The Respondent and I married at Bay Minette, Alabama on the 8th day of January, 1949. The Respondent and I immediately after our marriage learned that we could never live together as husband and wife. The Respondent threatened and abused me and threatened to do actual violence to my person which would necessarily endanger my life and health. The conduct of the Respondent was such as to give me every reasonable apprehension to believe and I did actually believe that if I continued to live with him he would carry out his threats and do actual violence to my person which would necessarily endanger my life and health.

Cross

I know the conditions are such that the Respondent and I can never live together as husband and wife.

Cross

The Respondent and I have one child, Barbara Eileen Cooper, now five months old, who is with me and I am the suitable, fit and proper person to have its care, custody and control.

Laura Mae Cooper

Cross

My name is Celeste White. I am the mother of the Complainant in the above cause. My daughter is now living in the home with me, I have known the Respondent for many years. I know that my daughter and the Respondent can never live together as husband and wife. I have on various occasions discussed the matter of a divorce with my husband, the father of the Complainant, and we have concluded that it is to the best interest of the Complainant that she be granted a divorce.

I know that the Complainant and the Respondent can never live together as husband and wife.

Celeste White

ORAL EXAMINATION.

I, Nita Ann Hall, 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 s 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 s or had proom made before me of the identity of said witness s; 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 14 day of July, 194 9

Nita Ann Hall (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

JOHN B. COOPER
vs. Complainant

LAURA MAE COOPER
Respondent.

Oral Deposition

Filed _____, 194

Recorded in _____, Register.

Vol. _____ Page _____
Record _____, Register.

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

JOHN B. COOPER

Complainant

VS.

LAURA MAY COOPER

Respondent

I, Louise Morris

as Register and Commissioner

have called and caused to come before me

John B. Cooper and Elizabeth Cooper

witness named in the Requirement for Oral Examination, on the 22 day of July 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 John B. Cooper and Elizabeth Cooper doth depose and say as follows:

My name is Elizabeth Cooper. I am a resident of Baldwin County, Alabama. The Complainant John B. Cooper, is a bona fide resident of Baldwin County, and has been all of his life; he is twenty-three years old.

The Respondent Laura May Cooper, has been a resident of Baldwin County, Alabama, all of her life, until just a short time ago, when she moved to Mobile County, with her folks.

The Complainant and the Respondent went through a marriage ceremony, at Bay Minette, in Baldwin County, Alabama, on January 8, 1949. The Respondent at the time of the marriage was pregnant, and had accused the Complainant of being the father of said child. She at that time complained that her child would be born sometime in April. The child was born on February 10. The Complainant was not or is not the father of the child. When the Complainant was brought into court he was advised that unless he married the Respondent he would be tried for carnal knowledge and sent to the penitentiary. The Respondent at that time represented her age as being under sixteen. We have since that time checked the census record for the year 1940, and find that the Respondent was born on March 5, 1932, and therefore was over sixteen years of age, at the time it was alleged that the Complainant had intercourse with her, and therefore the Complainant could not have been prosecuted for carnal knowledge of a girl under sixteen. The Complainant has repeatedly denied being the father of the said child. He being forced to marry her against his will the marriage was wholly void. The Complainant and the Respondent have not ever lived together.

The Respondent instituted a proceeding before the Probate Judge of Baldwin County, Alabama, to force the Complainant to support the child of which he is not the father.

The parties since the birth of the child at an earlier time, and was expected have decided that it is to the best interest of all parties concerning that the marriage or the attempted marriage by annulled.

Elizabeth Cooper

ORAL EXAMINATION.

I, Louise Morris, 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—and read over to them and they signed the same in the presence of myself H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness—or had proom 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 9 day of July, 194 9.

Louise Morris (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed _____, 194 _____

, Register.

Recorded in

Record

Vol. _____

Page _____

, Register.

My name is John B. Cooper. I am the Complainant in the above cause. I am a bona fide resident of Baldwin County, Alabama, and have been all of my life. I am over twenty-one years of age.

The Respondent Laura May Cooper is a bona fide resident of Baldwin County, Alabama, and has been all of her life until just recently, when she moved to Mobile County.

The Respondent Laura May Cooper and I went through a form of marriage ceremony, in Bay Minette, Alabama, on January 8, 1949. We did not live together any at all either before or after our divorce. At the time of the so called marriage the Respondent had made an affidavit before a Justice of the Peace, charging me with carnal knowledge. Just before our marriage I was brought into court and was advised that unless I went through a marriage ceremony, I would be convicted and necessarily have to serve in the penitentiary from two to 10 years. It was represented to me that the Respondent at that time was under sixteen years of age. I have since learned that the statement as to her age was false, and made for the purpose of inducing me to marry her. I find according to the 1940 census record that she was born on March 5, 1932. I was also advised and the fact was used against me to force me to marry her, that she was pregnant with a child, and that the child would be born sometime in April. The child was born on February 10, rather than in April as they had represented to me. I was forced to marry the Respondent against my will. I am not the father of the child. I know that the Respondent and I can never live together as husband and wife. Neither the Respondent nor I have accepted each other as husband or wife, since the appointed marriage ceremony.

John B Cooper

JOHN B. COOPER	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA
VS.	Ø	IN EQUITY
LAURA MAE COOPER	Ø	
RESPONDENT	Ø	

TO HONORABLE TELFAIR J. MASHEURN JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, JOHN B. COOPER, humbly complaining against the Respondent LAURA MAE COOPER, respectfully represents and shows unto your Honor, and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama.

2.

That the Respondent is a bona fide resident of Baldwin County, Alabama, seventeen years old.

4.

That your Complainant and the Respondant married at Bay Minette, in Baldwin County, Alabama, on January 8th, 1949.

5.

That the Respondent at the time of the marriage was pregnant; that the Complainant is not the father of the child; that your Complainant was against his will, forced to marry the Respondent; that he has refused to and has never lived with the Respondent; that he has not condoned the conduct of the Respondent; that a child was born to the Respondent on February 10, 1949.

6.

That the Respondent has instituted a proceeding before the Probate Judge of Baldwin County, Alabama, as Juvenile Judge to force him to support the said child, of which he is not the father.

7.

That the marriage between your Complainant and the Respondent is wholly void.

WHEREFORE the premises considered your Complainant prays that your Honor will by proper process make the said Laura Mae Cooper, party respondent to this bill of complaint, requiring her 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.

Your Complainant further prays that upon a final hearing hereof, a decree be made annulling and voiding the said marriage between your Complainant and the Respondent; that the complainant be released from any responsibility toward the Respondent of her child.

That your Honor will give and grant to your Complainant such other further, different or general relief as he may be in equity and good conscience entitled to receive.

John B. Cooper
Complainant

John Hall
Solicitor for Complainant

STATE OF ALABAMA }
BALDWIN COUNTY }

Before me the undersigned authority in and for said County, in said State, personally appeared, John B. Cooper, who is known to me, and who having been by me first duly sworn deposes and says, that the facts contained in the foregoing bill of complaint are true.

John B. Cooper

Sworn to and subscribed before me on this the 12th day of March, 1949.

John Hall
Notary Public, Baldwin County, Alabama.

SUMMONS AND COMPLAINT

THE STATE OF ALABAMA, }
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No. 2252

TERM, 194

TO ANY SHERIFF OF THE STATE OF ALABAMA :

You Are Hereby Commanded to Summon Laura Mae Cooper

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

Laura Mae Cooper, Defendant

by

John B. Cooper, Plaintiff

Witness my hand this 14th day of March 1949

Alvin J. French, Clerk.

No. 2252

Page _____

THE STATE of ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT

JOHN B. COOPER

Plaintiffs

vs.

LAURA MAE COOPER

Defendants

SUMMONS and COMPLAINT

Filed 3-14-49, 1949

Alice J. Leach ^{By} Clerk

Plaintiff's Attorney.

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

3-15, 1949

Taylor Williams, Sheriff

I have executed this summons

this 3-16, 1949

by leaving a copy with

Laura Mae Cooper

Taylor Williams Sheriff

V. F. Hall Deputy Sheriff

JOHN B. COOPER

COMPLAINANT

VS.

LAURA MAY COOPER

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. _____

This cause coming on to be heard was submitted upon the Complainant's bill of complaint for an annulment of the marriage between the Complainant and the Respondent on January 8th, 1949, and the pleadings and testimony as noted by the Register.

The Court after understanding and considering the matter is of the opinion that the marriage between the Complainant and the Respondent was void, and that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court, that the marriage between the Complainant and the Respondent be and the same is hereby annulled and that the Complainant is forever released and discharged from any and all obligations and duties arising from said marriage.

IT IS FURTHER ORDERED that the Complainant pay the cost herein for which execution may issue.

Dated this the ____ day of July, 1949.

Judge

STATE OF ALABAMA
BALDWIN COUNTY

I, Alice J. Duck, Register of the Circuit Court of Baldwin County, Alabama, hereby certify that the foregoing is a full, true, correct and complete copy of the decree in the matter of John B. Cooper Complainant, vs. Laura May Cooper, Respondent, as the same appears on file in my office.

Witness my hand and seal of office on this the ____ day of July, 1949.

Register

ANSWER AND CROSS BILL

JOHN B. COOPER	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY
LAURA MAE COOPER	Ø	
RESPONDENT	Ø	

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

Comes the Respondent in the above styled cause and
for answer to the Bill of Complaint heretofore filed in this
cause Respondent says:

1.

That she admits the allegations of counts numbered
1, 2, and 4.

2.

Your Respondent further admits that your Complainant
is over the age of 21 years and that the Respondent is under
the age of 21 years.

3.

Your Respondent neither admits nor denies the alle-
gations of counts 5 and 6.

4.

Your Respondent denies the allegations of count 7.

5.

Your Respondent further alleges that proceedings
charging nonsupport were instituted before the Judge of the
Juvenile Court of Baldwin County, to-wit: Honorable W.R. Stuart
and such action is pending.

AND NOW HAVING ANSWERED the Allegations of the Bill
filed in this cause by John B. Cooper, the Respondent prays
this her answer be made and taken as a cross bill, and she avers:

1.

Your Respondent further shows unto this Honorable Court that she was pregnant and that such pregnancy was the result of intercourse with the Complainant in this cause upon the urging and solicitation by this Complainant, together with the promise of marriage if such pregnancy did occur and in any event as soon as said Complainant could find a suitable place in which the parties to this cause might reside or inhabit, and that your Respondent was under the age of 16 years at the time the first intercourse took place.

2.

Your Respondent further shows that the Complainant, in compliance with his promise to marry your Respondent, did so. That he expressed his desire to enter into a marriage agreement on the day of their marriage before members of your Respondent's family and certain other individuals unrelated to either party.

3.

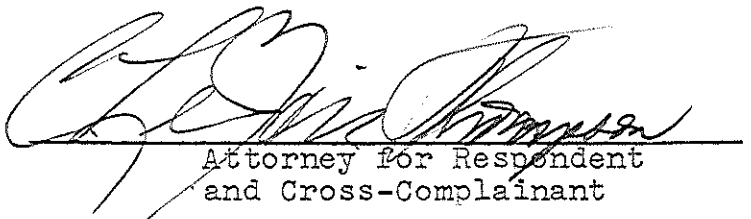
That the Complainant sought the special permission of the Judge of Probate of Baldwin County, for a license to be issued, that such license was issued by said Judge and that the ceremony was preformed by said Judge at the request of your Complainant.

4.

Your Respondent further shows unto this Honorable Court that said Complainant admitted publicly, the intercourse, aforesaid, acknowledging same before one, T.C. Hand, Justice of Peace, and before said Judge of Probate. That subsequent to said marriage there was born on February 10, 1949, unto the parties to this suit an infant child, named Barbara Eileen Cooper.

The Respondent further prays that the court may take this answer as her cross bill and your cross-complainant make as party respondent to this cross bill of complaint

the said John B. Cooper. Your cross-complaint shows unto the Court that this separation is without fault on her part, that she has at all times been ready, willing and able to preform her duties as wife and as a mother to their child; that she is still ready, able and willing to resume their marital relationship and to make a home for the cross-respondent and for their child, and that she still hopes that the cross-respondent may become reconciled and agree to join with the cross-complainant in rearing and educating their child. She denies that any just cause for divorce exists. If he should persist in such separation the cross-complainant prays the Court will order maintenance and support for the infant child, in the amount of \$40.00 per month and further prays for custody and control of said child. She shows unto the Court, however, that he is a fit and suitable person to be entrusted with the custody, care, maintenance and education of the said child, and that it is to the best interest of said child that it's custody be vested in this cross-respondent to visit and see it at all reasonable times and places. If the cross-Respondent should persist in remaining separated from the cross-complainant then she prays that the Court may make such orders as to the custody, care, maintenance and support of said child, and specifically prays that it's custody and care be entrusted to her, the cross-respondent and that Your Honor will give and grant to your Complainant such other further, different and general relief as she in equity and good conscience be entitled to receive.


Attorney for Respondent
and Cross-Complainant

JOHN B. COOPER

vs.

LAURA MAY COOPER

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, _____

Original bill of complaint, answer and waiver of Respondent and Testimony
of Elizabeth Cooper and John B. Cooper.

and in behalf of Defendant upon _____

H. M. HALL

Becky J. Hatcher
Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

JOHN B. COOPER

vs.

LAURA MAY COOPER

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194.....

Register.

FILED

Printed By The Baldwin Times

JUL 12 1949

ALICE J. DUCK, Register

AMENDED ANSWER

JOHN B. COOPER

COMPLAINANT

VS:

LAURA MAE COOPER

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

TO HONORABLE TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT
COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

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

The Respondent admits allegations as to ages, residence and
as to time and place of marriage, 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 notice.

Laura Mae Cooper
Respondent

Attorney for Respondent

STATE OF ALABAMA
BALDWIN COUNTY

I, E. C. Steedley, a Notary Public in and for said County in said
State, hereby certify that Laura Mae Cooper, whose name is signed to the
foregoing instrument, and who being known to me, acknowledged before me
on this day, that, being informed of the contents of said instrument
she executed the same voluntarily on the day same bears date.

Given under my hand and seal, on this, the 25th day of June, 1949

Notary Public
NOTARY PUBLIC

'AMENDED ANSWER AND CROSS BILL'

JOHN B. COOPER	§	
COMPLAINANT	§	IN THE CIRCUIT COURT OF
VS	§	BALDWIN COUNTY, ALABAMA
LAURA MAE COOPER	§	IN EQUITY
RESPONDENT	§	

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

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint heretofore filed in this cause Respondent says;

1.

That she admits the allegations of counts numbered 1,2, and 4.

2.

Your Respondent further admits that your Complainant is over the age of 21 years and that the Respondent is under the age of 21 years.

3.

Your Respondent neither admits nor denies the allegations of counts 5 and 6.

4.

Your Respondent denies the allegations of count 7.

5.

Your Respondent further alleges that proceedings charging nonsupport were instituted before the Judge of the Juvenile Court of Baldwin County, to-wit: Honorable W.R. Stuart and such action is pending.

AND NOW HAVING ANSWERED the Allegations of the Bill filed in this cause by John B. Cooper, the Respondent prays this her answer be made and taken as a cross bill, and she avers:

1.

Your Respondent further shows unto this Honorable Court that she was pregnant and that such pregnancy was the result of intercourse with the Complainant in this cause upon the urging and solicitation by this Complainant, together with the promise of marriage if such pregnancy did occur and in any event as soon as said Complainant could find a suitable place in which the parties to this cause might reside or inhabit, and that your Respondent was under the age of 16 years at the time the first intercourse took place.

2.

Your Respondent further shows that the Complainant, in compliance with his promise to marry your Respondent, did so. That he expressed his desire to enter into a marriage agreement on the day of their marriage before members of your Respondent's family and certain other individuals unrelated to either party.

3.

That the Complainant sought the special permission of the Judge of Probate of Baldwin County, for a license to be issued, that such license was issued by said Judge and that the ceremony was performed by said Judge at the request of your Complainant.

4.

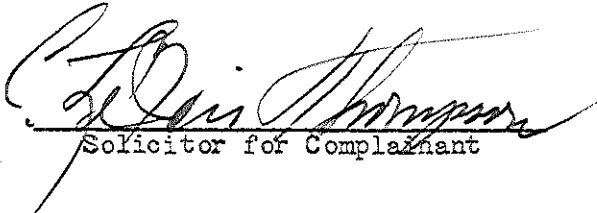
Your Respondent further shows unto this Honorable Court that said Complainant admitted publicly, the intercourse, aforesaid, acknowledging same before one, T. C. Hand, Justice of Peace, and before said Judge of Probate. That subsequent to said marriage there was born on February 10, 1949, unto the parties to this suit an infant child, named Barbara Eileen Cooper.

5.

That the Complainant and cross Respondent threatened your Respondent and cross Complainant, abused her and threatened to do actual violence to her person which would necessarily endanger her life and health. On to-wit January 8th following the marriage of said parties the conduct of the said Complainant and cross Respondent was such to create every reasonable apprehension in your Respondent and cross Complainant so that she would believe and did believe actually that if she continued to live with him he would carry out

such threats doing actual violence to her person necessarily endangering her life and health.

The Respondent further prays that the court may take this answer as her cross bill and your cross-complainant make as party Respondent to this cross bill of Complainant the said John B. Cooper. Your cross-complainant shown unto the Court that this separation is without fault on her part and that on final hearing of this cause that your Honor will grant unto her an absolute divorce, forever dissolving the bonds of matrimony existing between your Complainant and the Respondent and at the time of rendering this decree your Honor will grant unto your Complainant the care, control and custody of the child, Barbara Eileen Cooper. She further shows unto the Court that she is a fit and suitable person to be entrusted with the custody, care, maintenance and education of the said Barbara Eileen Cooper and specifically prays that it's custody and care be entrusted to her. Should your Complainant be mistaken in the relief prayed for, that there be granted unto her such other, different and general relief to which she may be entitled and as in duty bound she will ever pray.


Solicitor for Complainant

IN ACCOUNT WITH
FARMERS & MERCHANTS BANK
FOLEY, ALA.

Name Helen B. Coe.
E. F. Sanders, Administrator
Address Foley, Ala.

DEC 27 1948

Statement of your Account to close of business.

PLEASE EXAMINE AT ONCE. IF NO ERROR IS REPORTED IN TEN DAYS THE ACCOUNT WILL BE CONSIDERED CORRECT.

INGTON RAND INC.

20M 15-47 B4B 620-4423-B0

DATE	CHECKS IN DETAIL	DATE	DEPOSITS	DATE	NEW BALANCE
	BALANCE BROUGHT FORWARD	MAY 2 1948	548.78 *		
2/48	5.76 -	JUN 22 1948		JUN 22 1948	543.02 *
8/48	2.76 -	JUN 28 1948		JUN 28 1948	540.26 *
6/48	3.50 -	JUL 5 1948		JUL 6 1948	536.76 *
		JUL 10 1948	175.50	JUL 10 1948	712.26 *
0/48	4.20 -	JUL 10 1948		JUL 10 1948	708.06 *
3/48	32.00 -	JUL 13 1948		JUL 13 1948	676.06 *
1/48		JUL 31 1948	611.50	JUL 31 1948	1,287.56 *
			175.50	OCT 2 1948 5	1,463.06 *
353.00 -				DEC 8 1948 6	1,110.06 *
			4.60	DEC 15 1948 6	1,114.66 *
102.00 -				DEC 18 1948 7	1,012.66 *

THE LAST AMOUNT IN THIS
COLUMN IS YOUR BALANCE.

BALANCE

This statement is furnished you instead of balancing your pass book. It saves you the trouble of bringing your pass book to the bank and waiting for it to be balanced. These statements will be found very convenient to check up and file. All items are credited subject to final payment.
USE YOUR PASS BOOK ONLY AS A RECEIPT BOOK WHEN MAKING DEPOSITS.

W.C. Halme - 353.00-
 Hieggren Martin 102.00-
 Anne O'Fathery 658-
 J.B. Blaschke - atty 1100.00
 J. B. Blaschke - atty 1.90
 John D. Baird (Gen. Tull) 2500-
 J. M. Baird - Broker 3.60

Bal - 2373.88

Bal - 676.06
 Due Bal E. 94.50
 ✓ ✓ ✓ 94.50
 ✓ ✓ ✓ 94.50
 ✓ ✓ ✓ 94.50
 ✓ annu 81.00
 ✓ ✓ 81.00
 ✓ ✓ 81.00
 ✓ 61-29 ✓ 460
 Refund auto Dp. 100.00
 Cash in Box - 351.00
 Sale of Dp. - 260.50
 Sale of Sav Bank - 63.00
 Sale of Irish A.C.R. 1778.80
 Sale of 10 shares 161.00

6200

6721.08

184

6905

46

184

IN ACCOUNT WITH
FARMERS & MERCHANTS BANK
FOLEY, ALA.

Name Helen B. Coe Estate
E F. Sanders- Administrator.
 Address Foley, Ala.

Statement of your Account to close of business FEB 24 1950

PLEASE EXAMINE AT ONCE. IF NO ERROR IS REPORTED IN TEN DAYS THE ACCOUNT WILL BE CONSIDERED CORRECT.

REMINGTON RAND INC.															
DATE		CHECKS IN DETAIL				DATE		DEPOSITS		DATE		NEW BALANCE			
BALANCE BROUGHT FORWARD						SEP 15 '49	SEP 15 '49				2,373.88 *				
							42.00	OCT 1 '49			2,415.88 *				
750.00 -								NOV 1 '49	1			1,665.88 *			
834.38 -						228 -			NOV 2 '49	3			829.22 *		
102.79 -									NOV 9 '49	4			726.43 *		
6.54 -									DEC 1 '49	5			719.89 *		
719.88 -									JAN 16 '50	6			.01 *		
														THE LAST AMOUNT IN THIS COLUMN IS YOUR BALANCE.	
BALANCE															