

2292

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 A. A. DRISKELL.

as witnesses in behalf of A. A. DRISKELL in a cause pending in our Circuit Court in Baldwin County, of said State, wherein A. A. DRISKELL

Complainant  
and HATTIE DRISKELL

Respondent

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

Witness 14<sup>th</sup> day of May, 1949

*Reid J. Church*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 2292

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

A. A. DRISKELL

Complainant

VS.

HATTIE DRISKELL

Defendant

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

LOUISE MORRIS  
WITNESSES:

THE STATE OF ALABAMA }  
Baldwin County }

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

A. A. DRISKELL COMPLAINANT

vs.

HATTIE DRISKELL RESPONDENT

I, LOUISE MORRIS

as Register and Commissioner

have called and caused to come before me A. A. DRISKELL

witness named in the requirement for Oral Examination, on the 11 day of May

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 A. A. Driskell

doth depose and say as follows:

My name is A. A. Driskell. I am over twenty-one years of age, and a bona fide resident of the State of Alabama, and have been continuously for more than ten years.

The Respondent Hattie Driskell is over twenty-one years of age, and a bona fide resident of the State of Alabama, and has been for more than ten years continuously.

The Respondent and I married at Lucedale, Mississippi, on April 19, 1947. We lived together as husband and wife, within the State of Alabama, until July 14, 1947, when the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time.

The Respondent and I both have been married before, and each of use have families. It was learned soon after our marriage that we could never live together as husband and wife in harmony.

The Respondent of her own free will and accord voluntarily abandoned me. I know that it is absolutely impossible for us to ever live together as husband and wife.

X A A Driskell

## ORAL EXAMINATION

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 him and he signed the same in the presence of myself and H. H. 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 14 day of May 1949.

Louise Morris (L. S.)

No. 2292

Page \_\_\_\_\_

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

A. A. DRISKELL

COMPLAINANT

VS.

HATTIE DRISKELL

RESPONDENT

ORAL DEPOSITION

Filed \_\_\_\_\_, 194\_\_\_\_\_

FILED

MAY 20 1949

RECORDED IN  
ALICE J. DUCK, Register

\_\_\_\_\_, Register.

\_\_\_\_\_, Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

\_\_\_\_\_, Register

A. A. DRISKELL

vs.

HATTIE DRISKELL

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

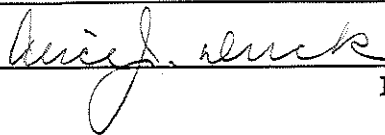
Circuit Court of Baldwin County

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



Register.

No. 2222.....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

A. A. DRISKELL

vs.

HATTIE DRISKELL

**NOTE OF TESTIMONY**

Filed in Open Court this .....  
day of **FILED** ....., 194.....

**MAY 20 1949**

**ALICE L. DICK** Register.

Printed By The Baldwin Times

STATE OF ALABAMA §  
BALDWIN COUNTY §

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon HATTIE DRISKELL, 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 A. A. DRISKELL as Complainant and against HATTIE DRISKELL, as Respondent.

WITNESS my hand this 20<sup>th</sup> day of May, 1949.

W. J. M. M. M.  
Register

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A. A. DRISKELL	§	IN THE CIRCUIT COURT OF
COMPLAINANT	§	BALDWIN COUNTY, ALABAMA
VS.	§	IN EQUITY
HATTIE DRISKELL	§	
RESPONDENT	§	

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

Your Complainant, A. A. DRISKELL, respectfully represents and shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on April 19, 1947; that they lived together as husband and wife, within the State of Alabama, until July 14, 1947.

3.

That the Respondent on July 14, 1947, voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

That there was born to the marriage between your Complainant and the Respondent no children.

WHEREFORE the premises considered your Complainant prays that your Honor will by proper process make the said Hattie Driskell, 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.

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 he be granted such other, further, different or general relief as he may be in equity and good conscience entitled to receive.

Solicitor for Complainant.

X A A Driskell  
Complainant



no 2292

A. A. DRISKELL

COMPLAINANT

VS.

HATTIE DRISKELL

RESPONDENT

SUMMONS AND COMPLAINT

In the law office of  
H. M. Hall.

FILED

MAY 20 1949

ALICE J. DUCK, Register

2d

A. A. DRISKELL  
COMPLAINANT  
VS.  
HATTIE DRISKELL  
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 that she and the Respondent are husband and wife; that they married at Lucedale, Mississippi, on April 19, 1947; that they are over twenty-one years of age and residents of Atmore in Escambia County, Alabama.

That Respondent denies the allegation as to voluntarily abandonment 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.

Mrs Hattie Driskell

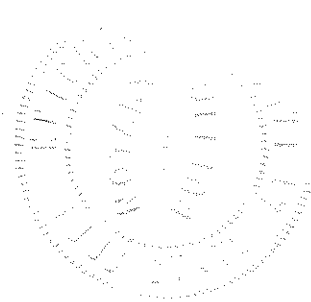
STATE OF GEORGIA  
COUNTY OF DECATUR

I, Orval Houghton, a Notary Public, in and for said County, in said State, hereby certify that Hattie Driskell, 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, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 29 day of April, 1949

Orval Houghton Notary Public, Decatur County, Georgia

My Commission Expires  
Dec. 17 - 1952



W 2292

ANSWER AND WAIVER

A. A. DRISKELL

COMPLAINANT

VS.

HATTIE DRISKELL

RESPONDENT

FILED  
MAY 20 1949  
ALICE J. DUCK, Register

# The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

A. A. DRISKELL, Complainant

vs.

HATTIE DRISKELL, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Answer and Waiver~~ 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 A. A. Driskell is forever divorced from the said Hattie Driskell for and on account of \_\_\_\_\_

Voluntarily 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 the payment of the cost of this suit.

It is further ordered that A. A. Driskell

the Complainant pay the cost herein to be taxed, for which execution may issue.

This 20<sup>th</sup> day of May, 1949.

Jeffrey G. Mansberry 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. 2292 Page \_\_\_\_\_

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

A. A. DRISKELL

Complainant

vs.

HATTIE DRISKELL

Respondent

DIVORCE DECREE

FILED

MAY 20 1949

ALICE J. DUCK, Clerk *ADA*