

2351

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA: EQUITY SIDE

TO

ALTON BRYANT POPE

You are hereby notified to appear and plead, answer or demur within thirty days of the receipt hereof to the Bill of Complaint filed in this Court at Bay Minette, Alabama, against you as Defendant by BETTY JEAN POPE, as Complainant.

WITNESS my hand this the day of September, 1949.

Register, Circuit Court

TO THE

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

Comes BETTY JEAN POPE and by this her Bill of Complaint, presented against ALTON BRYANT POPE, respectfully shows:

FIRST: That Complainant is fifteen years of age and Defendant twenty-one years; that both are now and have been all of their lives bona fide residents of the State of Alabama.

SECOND: That Complainant and Defendant were married in the State of Mississippi on June 25, 1949, returning at once to Robertsdale, Alabama, where they lived together as man and wife for about two weeks when Complainant was compelled to leave her husband because of his treatment.

THIRD: That within a few days after the marriage, Complainant discovered that the habits and attitude of her husband were such that she could not continue to live with him. She then found that he was a drinking man, being intoxicated the larger part of the time. His attitude toward her showed no affection and when drinking he was quarrelsome, threatening and dangerous, and though in the short time of their married life, he struck her only one time, his threats and attitude when intoxicated gave her reasonable apprehension to fear that should she continue to live with him it would be but a question of a short time before his cruelty to her would endanger her health or life; whereupon she left him and returned to her mother's home, where she has

remained since, separate and apart from her husband, to whom she fears to return because of his intemperate habits and fear of cruelty when in a drunken rage.

THE PREMISES CONSIDERED, Complainant prays that ALTON BRYANT POPE be made party defendant to this cause, and by proper process required to answer this Bill within the time prescribed by Law.

Complainant further prays that upon the hearing of this cause, a decree be rendered forever divorcing her from said ALTON BRYANT POPE, granting her the right to resume her maiden name; the right to marry again should she so desire, and to have such other, further or different relief as to equity may seem meet.

den name; the right to
such other, by the original
COMPLAINANT OF BIRTH
DEFENDANT
VICTIM BEHAVIOR BOARD
AG
COMPLAINANT OF BIRTH
BELLX TEVA BOARD

Solicitors for Complainant

BETTY JEAN POPE

Complainant,

Vs.

ALTON BRYANT POPE,

Respondent,

No.
E Q U I T Y

CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Comes ALTON BRYANT POPE, Respondent in the above styled cause, and for answer to the bill of complaint says he denies each allegation of same.

Respondent hereby waives notice of demand for oral examination of Complainant's witnesses; of the issue of commission to take testimony; of the time and place set for taking same and of the right to introduce evidence in his own behalf. He further agrees that this cause may be submitted for final decree at any time on the pleading and Complainant's evidence as noted by the Register.

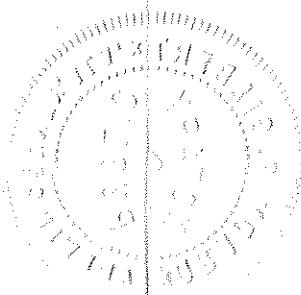
Alton Bryant Pope
Respondent

Before me, the undersigned Notary, personally appeared Alton Bryant Pope, who is known to me to be the Respondent above named and who acknowledged that he executed the foregoing answer voluntarily with knowledge of its contents.

Witness my hand and official seal this the 9th day of September, 1949.

Grady D. Gilbert
Notary Public, Baldwin County, Alabama.





Special Agent in Charge, Federal Bureau of Investigation

Handwritten signature

Handwritten signature

Dear Sir: I am writing to you regarding the case of the missing person.

Before we begin, I want to state that I am not a lawyer and I am not providing legal advice. I am only providing information that I have received from the police.

Handwritten signature
Special Agent in Charge

Respectfully,

Very truly yours,

Special Agent in Charge

Answer & Waiver

Filed 9-10-49
Deice French
Registrar

Enclosure

Very truly yours,

Special Agent in Charge

cc

Enclosure

Very truly yours,

cc

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA: EQUITY SIDE

TO

ALTON BRYANT POPE

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WITNESS my hand this the day of September, 1949.

Register, Circuit Court

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Risely & Risely

Solicitors for Complainant

100-200
ALTON BRYANT POPE
AS
DEFENDANT
JANUARY 1910
COURT OF
COMMON PLEAS
IN AND FOR
THE COUNTY OF
HAMILTON
ON

FILED
JAN 10 1910
CLERK OF COURT

Alton Bryant Pope

702351

BETTY JEAN POPE,
Complainant

VS

ALTON BRYANT POPE,
Defendant

BILL
OF
COMPLAINT

FILED

SEP 9 1949

ALICE J. DUCK, Register

Richarby & Richarby

Collection for Complaint

Bill of Complaint

There was no other relief as to the

interest in the property, and the right to the property

was not the right to the property, and the right to the property

was not the right to the property, and the right to the property

Complaint for the right to the property, and the right to the property

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Complaint for the right to the property, and the right to the property

LAW OFFICES

ELLIOTT G. RICKARBY

RICKARBY & RICKARBY
FAIRHOPE, ALABAMA

E. G. RICKARBY, JR.

September 8, 1949.

Mrs. Alice J. Duck, Register,
Bay Minette,
Alabama.

Dear Mrs. Duck:

POPE VS POPE: With this find Bill in
this case, with check for costs and decrees for
signature and certification. The answer and waiver
and testimony should be in your hands by Saturday.

Sincerely,

Elliott G. Rickarby
for
RICKARBY & RICKARBY

EGR:HB
Encs - 5
2947

THE STATE OF ALABAMA }
Baldwin County }

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

BETTY JEAN POPE

COMPLAINANT

vs.

ALTON BRYANT POPE

RESPONDENT

I, GRADY P. GILBERT

as Register and Commissioner

by agreement

have called and caused to come before me

BETTY JEAN POPE and MRS. ALMA McLAIN

witness ~~es~~ named in the requirement for Oral Examination, on the 9th day of September

1949, at the office of GRADY P. GILBERT

in Robertsdale, Alabama, and having first sworn said witness ~~es~~ to speak the

truth, the whole truth, and nothing but the truth, the said BETTY JEAN POPE and

MRS. ALMA McLAIN

doth depose and say as follows:

BETTY JEAN POPE

I am the Complainant in this cause and a lifelong resident of Robertsdale, Alabama, and fifteen years of age. On June 25, 1949, I Married Alton Bryant Pope, also a resident of Robertsdale, Alabama and twenty-one years of age. We went to Mississippi for the marriage but returned at once to Robertsdale where we went to live with my husband's parents in a family of eleven. Our marriage was not a success. After a few days my husband commenced drinking, which I did not know prior to my marriage, was his habit, and was intoxicated a large part of the time, some two or three days a week. He became indifferent to me and when drinking was quarrelsome and threatening. While he only struck me once, which he did without cause, he was constantly threatening me while intoxicated and I never knew at what moment he might carry his threats into effect and do me serious injury. After enduring his mistreatment for two weeks, I left him because of my fear that he would do me serious harm and returned to my mother's home where I have lived since. I have lost all affection for him because of his treatment and am afraid to go back and live with him.

Betty Jean Pope

MRS. ALMA McLAIN

I am the mother of Betty Jean Pope who has been living with me since the early part of July. She married Alton Bryant Pope and although he had promised to give her a home of her own, he took her at once to live with his people where her life was unhappy. She is a drinking man and while I never saw him mistreat my daughter, I know from what she told me that he has abused and threatened her and that she is afraid to live with him lest he should do her serious bodily harm. Although he persuaded her to marry him, since their marriage, he seems to have lost all affection for her and I know she is justified in fearing to return to live with him.

Mrs. Alma McLain

I, GRADY P. GILBERT 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 es and read over to them and they signed the same in the presence of myself and Grady P. Gilbert Jr. at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; 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 9th day of September 1949
Grady P. Gilbert (L. S.)
Commissioner

No. _____ Page _____
THE STATE OF ALABAMA,
BALDWIN COUNTY
IN CIRCUIT COURT, IN EQUITY
BETTY JEAN POPE
COMPLAINANT
vs.
ALTON BRYANT POPE
RESPONDENT
ORAL DEPOSITION
Filed 9-10, 1949
Alvin J. Luck, Register.
RECORDED IN _____
Record _____
Vol. _____ Page _____
_____, Register

Betty Jean Pope

vs.

Debra Bryant Pope

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, _____

Testimony of Complainant
and Mrs. Debra M. Pope

and in behalf of Defendant upon _____

Answer & Waiver

Alvin J. Smith

Register.

Pickarby

RECORDED

No.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Betty Jean Pope

vs.

Peter Bryant Pope

NOTE OF TESTIMONY

Filed in Open Court this *10th*
day of *Sept*, 194*9*

Archie J. Duck
Register.

Printed by the Baldwin Times

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BETTY JEAN POPE

, Complainant

vs.

ALTON BRYANT POPE

, 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 BETTY JEAN POPE is forever divorced from the said ALTON BRYANT POPE for and on account of

CRUELTY

IT IS FURTHER ORDERED that Complainant has the right to resume her maiden name

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 ALTON BRYANT POPE the Defendant pay the cost herein to be taxed, for which execution may issue.

This 12th day of September, 1949

J. J. J. J. J.
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.

2351

INDEXED

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

BETTY JEAN POPE

Complainant

vs.

ALTON BRYANT POPE

Respondent

DIVORCE DECREE

FILED
SEP 12 1949
ALICE J. DUCK, Register