

2735

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

Circuit Court, In Equity

Ruby Lee Heathcock Sullivan

, Complainant

vs.

Kenneth Sullivan

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Registered Mail 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 Ruby Lee Heathcock Sullivan is forever divorced from the said Kenneth Sullivan 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 Ruby Lee Heathcock Sullivan the Complainant pay the cost herein to be taxed, for which execution may issue.

This 27th day of November, 1951.

J. J. Madison
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

Ruby Lee Heathcock

Sullivan

Complainant

vs.

Kenneth Sullivan

Respondent

DIVORCE DECREE

FILED
NOV 27 1951
ALICE J. DUCK, Register

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama

(In Equity)

Ruby Lee Heathcock Sullivan

Complainant

VS.

Kenneth Sullivan

Respondent

I, Retha Smith

as Register and Commissioner

have called and caused to come before me Ruby Lee Heathcock Sullivanand Mrs. Allean Hadley

witnesses named in the Requirement for Oral Examination, on the 24th day of November
1951, at the office of Reuben F. McKinley

in Bay Minette, Alabama, and having first sworn said Witnesses to speak the
truth, the whole truth, and nothing but the truth, the said Ruby Lee Heathcock Sullivan
and Mrs. Allean Hadley doth depose and say as follows:

That my name is Ruby Lee Heathcock Sullivan. That I am over the
age of 19 years, a resident of Baldwin County, Alabama, and have been
for more than two years next preceeding. The Respondent is over the
age of 21 and is a resident of Washington County, Alabama. We were
married on to-wit, February 14, 1950 at Pascagoula, Mississippi and
lived together as husband and wife until the day of our separation
shich was on to-wit, May 15, 1951.

On to-wit May 15, 1951 and on several occasions prior there to, the
Respondent threatened and abusēd me, threatened to do violence to my
person and actually did do violence to my person which would necessarily
endanger my life and health. The conduct of the Respondent was such
that he gave me every reasonable apprehension to believe that if I
continued to live with him that he would carry out his threats and do
worse violence to my person. I do not know of any reason I gave him
for his abuse and mistreatment of me. There are no children, fruits of
this marriage, no property to be divided and I do not ask for alimony.

Ruby Lee Heathcock Sullivan

That my name is Mrs. Allean Hadley. I know both parties to this
cause. I know that the Complainant is over the age of 19 years and
that the Respondent is over the age of 21. I know that the Complainant
has been a resident of Baldwin County for more than two years next
preceeding. The Complainant and Respondent were married on to-wit
February 14, 1950 at Pascagoula, Mississippi and that the Complainant
and Respondent separated on to-wit May 15, 1951. I know of no cause
she gave him for the separation. I know that the Respondent threatened
and abusēd the Complainant before their separation and as far as I know
they have not lived together as husband and wife since May 15, 1951.
There are no children as fruits of this marriage.

Mrs. Allean Hadley

ORAL EXAMINATION.

I, Retha Smith, as Register and Commissioner hereby certify that the foregoing depositions on Oral Examination was taken down by me in writing in the words of the witnesses and read over to them and they signed the same in the presence of myself and Reuben F. McKinley

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 witnesses; 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 24th day of November, 1951

Retha Smith (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Ruby Lee Heathcock Sullivan

vs. Complainant

Kenneth Sullivan

Respondent.

Oral Deposition

Filed 11-26, 1951

Chris Heathcock, Register.

Recorded in

Record

Vol. _____ Page _____

Register.

Ruby Lee Heathcock Sullivan

Complainant

vs.

Kenneth Sullivan

Respondent

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, Note
of Testimony, Oral Depositions, Motion for Decree Pro Confesso,
and Decree Pro Confesso on Personal Service.

and in behalf of Defendant upon

Robert F. McQuiley
Solicitor for the Complainant

Wm. J. Duncanson

Register.

No. 2949.....

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

Ruby Lee Heathcock Sullivan

vs.

Kenneth Sullivan

NOTE OF TESTIMONY

Filed in Open Court this 26th.....

day of Nov....., 1947

W. J. [Signature]
Register.

Printed By The Baldwin Times

TO ANY SHERIFF OF THE STATE OF ALABAMA:

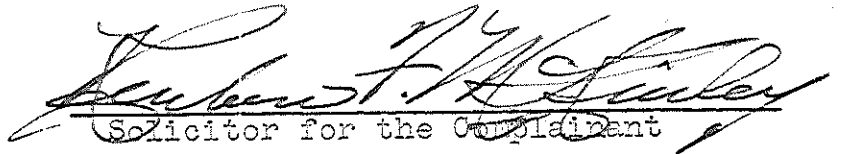
WITNESS my hand this the 16th day of Oct, 1951.

Register

That the Complainant and the Respondent have no children as fruits of this marriage, and there is no property to be divided.

WHEREOF, the premises considered, the Complainant prays that your Honor will by proper process make the said Kenneth Sullivan, party Respondent to this cause of action, 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.

The Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her 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 the Complainant

No 2233

RECORDED

Received in Sheriff's Office
this 16 day of Oct, 1951
TAYLOR WILKINS, Sheriff

Ruby Lee Heathcock Sullivan

Complainant

VS

Kenneth Sullivan

Respondent

Summons and Complaint

Bar 81
Hagar, Ala.

From the Law Office Of
Reuben F. McKinley
Attorney At Law
Bay Minette, Alabama

FILED

OCT 16 1951

ALICE J. DUCK, Register

RECEIVED IN OFFICE
This 17 day of Oct 1951
L. L. ARMSTRONG, Sheriff
Washington County, Ala.
EXECUTED
This day of Oct 1951
by serving a copy of the
within on
L. L. ARMSTRONG, Sheriff
Washington County, Ala.
1951

CIRCUIT COURT COMPLAINT

Printed by the Baldwin Times, Bay Minette, Alabama.

RUBY LEE HEATHCOCK SULLIVAN
Complainant,
Vs.
KENNETH SULLIVAN
Respondent.

In the Circuit Court.
In Equity No. _____.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent _____

KENNETH SULLIVAN

by the Sheriff of Washington County, on the 18th day of October,
194 51.

And it further appears to the Register, that that the said KENNETH SULLIVAN

_____ the Respondent, having to the date hereof,
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,
on motion of Reuben McKinley Solicitors
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,
and it hereby is, in all things taken as confessed against the said _____

KENNETH SULLIVAN

This 20th day of November, 19451.

W. J. Nelson
Register.

THE STATE OF ALABAMA,
BALDWIN COUNTY

No. _____ Circuit Court, In Equity.

RUBY LEE HEATHCOCK SULLIVAN

Complainant

Vs.

KENNETH SULLIVAN

Defendant

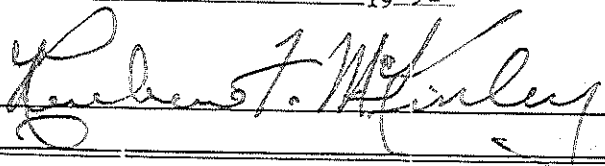
Motion is hereby made for a Decree Pro Confesso against

KENNETH SULLIVAN

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant; and that said summons was duly served according to law, and that said Defendant has failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 20th day of November 19 51

 Solicitor.

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: Retha Smith

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 Ruby Lee Heathcock Sullivan and Mrs. Allean Hadley

as witnesses in behalf of Ruby Lee Heathcock Sullivan in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Ruby Lee Heathcock Sullivan

is, Complainant and Kenneth Sullivan

is Respondent

on oath, to be by you administered, upon Retha Smith to take and certify the deposition s of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 24th day of Nov, 1951

Archie J. French
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Ruby Lee Heathcock Sullivan

vs. Complainant—

Kenneth Sullivan

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Retha Smith

WITNESSES:

Ruby Lee Heathcock Sullivan

Mrs. Aileen Hadley

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