

The State of Alabama, Baldwin County

Circuit Court, In Equity

MAGGIE LEE BROWN, Complainant

vs.

JAMES BROWN, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ 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 MAGGIE LEE BROWN is forever divorced from the said JAMES BROWN for and on account of Abandonment

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Complainant be and she is hereby authorized and empowered to resume the use of her maiden name, Maggie Lee Williamson.

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

This 18th day of July

19-50
Telfair J. Mashburn, Jr.
Judge Circuit Court, In Equity.

I, Alice J. Duck 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 July, 19-50.

Register of Circuit Court, In Equity.

RECORDED

No. 2509 Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

MAGGIE LEE BROWN

Complainant

vs.

JAMES BROWN

Respondent

DIVORCE DECREE

FILED
JUL 18 1950

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

MAGGIE BROWN
Complainant

CIRCUIT COURT

vs.

BALDWIN COUNTY, ALABAMA

JAMES BROWN
Respondent

IN EQUITY

No. _____

ORAL DEPOSITION

I, Clara Staimpel as Register and Commissioner in the above style cause have called and caused to come before me Maggie Brown and Dolly Coat witnesses named in the Requirement for Oral Examination, on the 17th day of July 1950, at the office of Clara Staimpel in Foley, Alabama, and have first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Maggie Brown and Dolly Coat doth depose and say as follows:

My name is Maggie Brown. I am twenty-eight years of age. I have lived here and have been a resident of Magnolia Springs, Alabama for the last twelve years. James Brown is forty-eight years old and lives in Myrtle Grove, Florida now. James Brown and I were married at Magnolia Springs, Alabama on July 18, 1936. James and I have no children.

A year ago last Easter this woman Mamie Wright came to live with us. She was sick and didn't have anybody to look after her or any place to live. She was a friend of James's. I didn't think anything about it. I took care of her as much as she needed it. I cooked her breakfast and served it to her in bed before I went to work at the laundry and never suspected nothing. The next thing I knew James and Mamie had picked up and gone to Myrtle Grove, Florida to live, while I was at work. That was around the last of May last year. They have been living together over there ever since. He's been telling folks that they is married, and that me and him is divorced.

I didn't do nothing to run him off. He just up and left with Mamie. He ain't give me nothing to live off of or no money any-time since they left, and he ain't paid none of my bills. He don't even pay his own.

Maggie Brown

My name is Dolly Coats. I am 38 years old. I live next door to Maggie Lee Brown and lived next to her when her husband James Brown run off with the woman to Florida. That was a year ago last May. I seen James a couple of times since and he said that he had a divorce from Maggie and that he and Mamie Wright was married and he wanted people to quit talking about him. I know he hasn't lived with Maggie since he left and I know he hasn't give her any money or supported her because he didn't do that before.

Dolly Coats

ORAL EXAMINATION:

I, Clara Staimpel, 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 Clara Staimpel at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses or had proof 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 17th day of July, 1950.

Clara Staimpel (I.S.)

No. 2509

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CIRCUIT COURT IN EQUITY

BALDWIN COUNTY, ALA.

MAGGIE BROWN
Complainant

vs.

JAMES BROWN
Respondent

ORAL DEPOSITION

FILED

JUL 18 1950

ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: CLARA STAMPFL

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 _____

MAGGIE LEE BROWN

and

DOLLY COATS

as witnesses in behalf of MAGGIE LEE BROWN in a cause pending in our Circuit Court in Baldwin County, of said State, wherein _____

MAGGIE LEE BROWN

_____, Complainant
and _____

JAMES BROWN

_____, Respondent

on oath, to be by you administered, upon July 17, 1950
to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 17th day of July, 194 50.

Alvin J. [Signature]

Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. 2509

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

MAGGIE LEE BROWN

Complainant

vs.

JAMES BROWN

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

CLARA STAMPEL

WITNESSES:

MAGGIE LEE BROWN

DOLLY COATS

ARTHUR C. EPPSON
ATTORNEY AT LAW
FOLEY, ALABAMA

FILED

18/1950

Register

MAGGIE BROWN :
Complainant :
vs. :
JAMES BROWN :
Respondent :

CIRCUIT COURT
BALDWIN COUNTY, ALABAMA
IN EQUITY

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

Comes your complainant, Maggie Brown, and respectfully represents and shows to your Honor:

1. That she is over the age of twenty-eight and is a bona fide resident of Baldwin County, Alabama; that the Respondent James Brown, is over the age of forty-eight and presently resides in Escambia County, Florida, That your Complainant and Respondent have been bona fide residents of the State of Alabama for more than two years next preceding the filing of this Bill of Complaint.
2. That your Complainant and Respondent were lawfully married on or about to-wit, the eighteen th day of July 1936 at Magnolia Springs, Alabama, and that they do not have any children.
3. That the said Respondent voluntarily and without fault on the part of the Complainant, abandoned the bed and board of the Complainant for more than one year next preceding the filing of this Bill of Complaint, since which time the Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.

The premises considered, your Complainant makes the said James Brown a party Respondent to this Bill of Complaint, and in order that the Complainant may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpoena to be issued, directed to the said James Brown commanding him to answer, plead, or demur to this Bill of Complaint, in the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your Complainant from the said Respondent,,granting the Complainant the right to remarry, and granting the Complainant the right to resume her maiden name, Maggie Lee Williamson, and that your Honor will grant such other, further and different relief as unto your Honor may seem just and proper, and your Complainant will ever pray.


SOLICITOR FOR COMPLAINANT

No. 25 **RECORDED**

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CIRCUIT COURT IN EQUITY

BALDWIN COUNTY, ALA.

MAGGIE BROWN
Complainant

vs.

JAMES BROWN
Respondent

BILL OF COMPLAINT

FILED

JUL 13 1950

ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

MAGGIE BROWN :
Complainant :

vs. :

JAMES BROWN :
Respondent :

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

This cause being submitted for final decree in behalf of the
Complainant, the Complainant offers the following testimony, to-
wit:

1. Bill of Complainant
2. Answer and Waiver of Respondent
3. Commission to take testimony
4. Oral depositions of Complainants Witnesses.

Arthur C. Eason

Solicitor for Complainant

Alice J. Eason
Register

RECORDED

No 2509

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CIRCUIT COURT IN EQUITY
BALDWIN COUNTY, ALA.

MAGGIE BROWN
Complainant

vs.

JAMES BROWN
Respondent

NOTE OF SUBMISSION

FILED

JUL 18 1950

ALICE J. DUCK, *Register*

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

MAGGIE BROWN
Complainant

vs.

JAMES BROWN
Respondent

CIRCUIT COURT IN EQUITY

BALDWIN COUNTY

ALABAMA

Now comes the Respondent, James Brown, and for answer to the bill of complaint herein says as follows:

1. He denies each and every material allegation contained in said bill of complaint and demands strict proof of same.

2. The respondent hereby waives notice of taking of testimony in this cause, notice of submitting said cause for final decree, and such other, further, or different notice to which might be otherwise entitled.

James Brown
RESPONDENT

Violet M. Dicks
Witness

C. L. Stimpert
Witness.

RECORDED

Case No. 2509 Page

CIRCUIT COURT IN EQUITY
BALDWIN COUNTY, ALA.

MAGGIE BROWN
Complainant

vs.

JAMES BROWN
Respondent

ANSWER AND WAIVER

FILED
JUL 18 1950
ALICE J. DUCK, Register

ARTHUR C. EPPERSON
ATTORNEY AT LAW
FOLEY, ALABAMA

2509