

1244

THE STATE OF ALABAMA, BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

SCHUYLER JACOBS

Complainant

VS.

DOROTHY JACOBS

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Conesso~~

on Answer & Waiver of the Respondent 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 Schuyler Jacobs is forever divorced from the said Dorothy Jacobs

for and on account of 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 Schuyler Jacobs the Complainant pay the cost herein to be taxed, for which execution may issue.

This ~~16th~~ ^{17th} day of December, 1944

J. W. Harrell
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. 1244 Page _____

The State of Alabama
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

vs. Complainant

Respondent

DIVORCE DECREE

Filed this _____ day of

_____, 194_____

Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA - - GREETINGS:

WE COMMAND YOU, that you summon DOROTHY JACOBS to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty days after the service of summons, and there to plead, answer or demur without oath to a bill of complaint lately exhibited by Schuyler Jacobs, against the said Dorothy Jacobs, and further to do and perform what the said Judge shall order and direct in that behalf, and this the Respondent shall in no wise omit under penalty of the law. And we further command that you return this writ with your execution thereon to our said Court, immediately upon the execution thereof.

WITNESS, R. S. DUCK, Register of said Court this the 20th day of December, 1944.

R. S. Duck
Register

SCHUYLER JACOBS)
COMPLAINANT)
VS.)
DOROTHY JACOBS)
RESPONDENT)

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY:

Now comes your Complainant, Schuyler Jacobs, and humbly complain-
ing against the Respondent, Dorothy Jacobs, respectfully represents and
shows unto your Honor and this Honorable Court as follows:

1.

That he is a bona fide resident of Baldwin County, Alabama, and
over twenty-one years of age, and has been such a resident for more than
three years next preceding the filing of the bill of complaint in this
cause; that the Respondent is a non resident of the State of Alabama, her
address being Charleston, South Carolina; that she is over twenty-one years
of age;

2.

That your Complainant and the Respondent were married at Rockhill,
South Carolina, on June 20, 1942, and lived together as husband and wife
until December 19, 1943;

3.

That on December 19, 1943, the Respondent voluntarily abandoned the bed and board of the Complainant and has remained away voluntarily and continuously since that time.

WHEREFORE, the premises considered, your Complainant prays that your Honor will, by proper process, make the said Dorothy Jacobs party Respondent to this cause of action, 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 your Honor will, upon the final hearing hereof, enter an order and decree granting to the Complainant an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; that your Honor will give and grant to him such other, further, different or general relief as he may be in equity and good conscience entitled to receive, and as in duty bound he will ever pray.

BEEBE & HALL

BY: 

Solicitors for the Complainant

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Filed

12-20-44

P.S. Luck
Key

SCHUYLER JACOBS
COMPLAINANT
VS.
DOROTHEA JACOBS
RESPONDENT

SUMMONS & COMPLAINT

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

SCHUYLER JACOBS Complainant

VS.

DOROTHY JACOBS Respondent

I, Lillian Patterson

as Register and Commissioner

have called and caused to come before me Schuyler Jacobs and Louise Jacobs

witnesses named in the Requirement for Oral Examination, on the 16 day of December 1944, at the office of Beebe & Hall in Bay Minette, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Schuyler Jacobs doth depose and say as follows:

My name is Schuyler Jacobs, I am over twenty-one years of age and a bona fide resident of Bay Minette, in Baldwin County, Alabama, and have been for more than three years next preceding the filing of the bill of complaint in this cause.

The Respondent is over twenty-one years of age and a non resident of the State of Alabama, her address being Charleston, South Carolina.

The Respondent and I married in Rock Hill, South Carolina, on June 20th, 1942. We lived together as husband and wife until December, 19, 1943, when the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time.

The Respondent absolutely refuses to ever live with me again.

Schuyler Jacobs

Louise Jacobs a witness for the Complainant being first duly sworn, deposes and says:

My name is Louise Jacobs. I live at Bay Minette in Baldwin County, Alabama.

The Complainant Schuyler Jacobs, is my brother.

I know that my Brother Schuyler Jacobs and the Respondent Dorothy Jacobs have not lived together as husband and wife since December 1, 1943, when the Respondent voluntarily abandoned the Complainant.

Louise Jacobs

ORAL EXAMINATION.

I, Lillian Patterson, 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^{es} and read over to them and they signed the same in the presence of myself and H. M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness^{es} or had proom 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 16th day of December, 1944.

Lillian Patterson (L. S.)

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THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

vs. Complainant

Respondent.

Oral Deposition

Filed 12-20, 1944

R.S. Woods Register.

Recorded in

Record

Vol. _____ Page _____

_____, Register.

1244

Filed

12-20-44

R.S. Duck
Reg
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STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 194_____

SCHUYLER JACOBS _____, Complainant

Vs.

DOROTHY JACOBS _____, Defendant

To R. S. DUCK _____, Register

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Beebe & Hall

_____ Solicitors of record, now files with the Register of this

Court this written request to deliver the papers in this cause to the Judge for final decree in vaca-

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The State of Alabama,

Baldwin County

CIRCUIT COURT, IN EQUITY

Vs.

**REQUEST FOR DECREE IN
VACATION**

Filed 12-20, 1944

R.S. Duck
Register.

Recorded in _____ Record

Vol. _____ Page _____

Register.

THE STATE OF ALABAMA, }
Baldwin County }

CIRCUIT COURT

TO Lillian Patterson

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 Schuyler Jacobs and Louise Jacobs

as witnesses in behalf of The Complainant in a cause pending in our Circuit Court of Baldwin County, of said State, wherein Schuyler Jacobs

Complainant

and Dorothy Jacobs

Defendant,

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

Witness 16th day of December, 1944.

RS Duck

REGISTER

Commissioner's Fee \$ _____

Witness' Fees, \$ _____

NO. 1244

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Complainant

VS.

Defendant

Commission To Take Deposition

COMMISSIONER:

Witnesses:

Schuyler Jacobs

Complainant

VS.

Dorothy Jacobs

Respondent

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
Answer and Waiver of the Respondent and testimony of Schuyler Jacobs
and Louise Jacobs.

and in behalf of Defendant upon

R.S. Duck

Register.

No. 1244

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

VS.

NOTE OF TESTIMONY

Filed in Open Court this 20

day of Dec 1934

R. S. Duck

REGISTER