The State of Alabama, Baldwin County

Circuit Court, In Equity

			LEUGENE JONES		,	Complainant
			vs.			
	<u> </u>	ALICE E.	. CRAWFORD JONES		······································	Respondent
	swer and	Waiver	and Tes	timony as no	oted by the	, Decree Pro Confesso of Register, and upon cor to the relief prayed for i
,	It is there		and Defendant be, ar		are hereby	ls of matrimony heretofor, dissolved, and that the
aid——					1S	forever divorced from th
aid.—	ALLO	E. Crawford	Jones			for and or account o
					And the second s	
3000		Net Little Steel Co.			The state of the state of	
	Tt is familia	r ordered adjud	and and degreed that	noither nort	er to this suit	chall again marry excen
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o each ays, n gain c	other until neither party It is further contract man	sixty days after y shall again man r ordered that t riage upon the p	the rendition of this ry except to each other complainant and ayment of the cost of	s decree, an her during th d Responder this suit.	d that if app	eal is taken within sixt
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No.2746 Page The State of Alabama BALDWIN COUNTY In Circuit Court, In Equity

MARSHALL EUGENE JONES

Complainant

vs

ALICE E. CRAWFORD JONES

Respondent

DIVORCE DECREE

FILED

Pose 71 15

ALICE J. DUCK, Register

STATE OF ALABAMA BALLWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAJA:

You are hereby commanded to summons ALICE E. CRAWFORD JONES 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 MARSHALL EUGENE JONES as Complainant and against ALICE E. CRAWFORD JONES as Respondent.

WITNESS my hand this the 24 the day of More 1951.

Acrost-reuch

MARSHALL EUGENE JONES

COMPLAINANT

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VS

ATTICE E. CRAWFORD JONES

RESPONDENT

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

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

Your Complainant, Marshall Eugene Jones, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and is over the age of twenty-one; that the Respondent is a bona fide resident of Baldwin County, Alabama, and over the age of eighteen.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on July 30, 1951, and lived together as husband and wife in Baldwin County, Alabama until September 9, 1951.

3.

That the said Respondent was pregnant at the time of the marriage without the knowledge, agency or consent of the Complainant.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Alice E. Crawford Jones 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.

Your Complainant prays that upon a hearing hereof, Your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Marshal Eugere Jourso
Complainant

Solicitor for Complainant.

RECORDED

MARSHALL EUGENE JONES

COMPLAINANT

VS

ALICE E. CRAWFORD JONES

RESPONDENT

SUMMONS AND COMPLAINT

From the law offices of C. LeNoir Thompson Bay Minette, Alabama

> FILED NOV 24 1951

ALICE J. DUCK, Register

MARSHALL EUGENE JONES

COMPLA INANT

VS

ALICE E. CRAWFORD JONES

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 the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demand 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 further notice.

Alie E. Crawford Jones

STATE OF ALABAMA

BALDWIN COUNTY

said County, in said State; hereby certify that Alice E. Crawford Jones, 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, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal or this the / day of September, 1951.

Notary Public, Baldwin County, Alabama.

RECORDED

Answer

FILED NOV 24 1951

ALIEE J. DUCK, Register

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

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as Register	and Commis	sioner									
have called					Bugene	Jones	and				
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19 <u>X 51</u> , at										1. 77.1.	
in Bay M	inette		Alabama	, and hav	ing first	sworn :				-	the
truth, the w	hole truth, a	and nothing	but the	truth, th	e said	Marsna.	LL Hu	gene	Jon	es and	
John :	E. Jones	d	oth depo	se and sa	v as follo	ows:					

That my name is Marshall Eugene Jones, I am over the age of 21 and a resident of Baldwin County, Alabama and have been more than two years next preceding. The Respondent, Alice E. Crawford Jones is over the age of 18 and a resident of Baldwin Jounty, Alabama. We were married at Lucedale, Mississippi on July 30, 1951 and lived together as husband and wife in Baldwin County, Alabama until September 9, 1951 at which time I learned that the Respondent was pregnant at the time of the marriage without myknowledge, agency or consent.

makolal Ergenfurer

That my name is John E. Jones, I know both parties to this cause, I know they were married in Lucedale, Mississippi, July 30, 1951 and lived together as husband and wife until September 9, 1951 at which time they separated. The cause of the separation was a statement by the Respondent that she was pregnant by someone else than her husband at the time of their marriage. From what I have learned he did not know anything about it at the time of the marriage and it did not happen with his knowledge or consent.

John, 6. Janls

THE STATE OF ALABAMA Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

	MARSSALL BUGGING OUNDO	Complainant
	vs.	
	ALICE E. CRAWFORD JCHES	Respondent
I, Lois Paul		Agricultural Company
as Register and Comm	issioner	
have called and caused	to come before me Marshall Eugene	Jones and John E. Jones
	the Requirement for Oral Examination, of C. LeNoir Thompson	on the ll day of September
truth, the whole truth,	, and nothing but the truth, the saiddoth depose and say as follo	Marshall Eugene Jones and
That my na	ame is Marshall Eugenc Jones, I a	im over the age of 21 and

That my name is Marshall Eugenc Jones, I am over the age of 21 and a resident of Baldwin County, Alabama and have been more than two years next preceding. The Respondent, Alice E. Crawford Jones is over the age of 18 and a resident of Baldwin County, Alabama. We were married at Lucedale, Mississippi on July 30, 1951 and lived together as husband and wife in Baldwin County, Alabama until September 9, 1951 at which time I learned that the Respondent was pregnant at the time of the marriage without myknowledge, agency or consent.

makstal Ergen June

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John E. Gonls

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Ι, .	Lois	Paul			as R	egister	and Co	mmiss	sioner	hereby	certif	y that	Č
the for	egoing	deposition_S	on_Oral	Examination	was	taken	down b	y me	in w	riting i	ı the	words	
of the	witness	esand_re	ead over	to them	and	they	signe	d the	same	in the	prese	nce of	f
myself	and	C. LeNoir I	hompso:	n	<u> </u>			.13.11.	at it.	<u>. 19 a.s.</u>		11. 7 <u>4</u> 1.	-

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witnesses 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 lith day of September , 19% 51

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

VS. Complainant

Alice B. Crawford Jones

Alice B. Crawford Jones

Alice B. Crawford Jones

Respondent.

Respondent.

Recorded in

Re

STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons ALICE E. CRAWFORD JONES to appear and plead, answer or demur within thirty days from the service hereof, to the bill of complaint fixed in the Circuit Court of Ballwin County, Alabama, in Equity, by MARSHALL EUGENE JONES as Complainant and against ALICE E. CRAWFORD JONES as Respondent.

WITNESS my hand this the 24th day of Nov. 1951.

/s/ Alice J. Duck Register

MARSHALL EUGENE JONES

COMPELINANT

VS

ALICE E. CRAWFORD JONES

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

IN EQUITY

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

That your Complainant is a bona fide resident of Baldwin County,
Alabama, and is over the age of twenty-one; that the Respondent is a bona
fide resident of Baldwin County, Alabama, and over the age of eighteen.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on July 30, 1951, and lived together as nusband and wife in Baldwin County, Alabama until September 9, 1951.

3.

That the said Respondent was pregnant at the time of the marriage without the knowledge, agency or consent of the Complainant.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Alice E. Crawford Jones 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.

Your Complainant prays that upon a hearing hereof, Your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

/s/ Marshal Eugene Jones
Complainant
/s/ C. LeNoir Thompson
Solicitor for Complainant.

	MARSHALL EU	GENE JONES		Q			
		COMPLAINANT		Q	IN THE C	DIRCUIT COURT O	F
Spri	VS	· · · · · · · · · · · · · · · · · · ·		Q	BALDWIN	COUNTY, ALABAM	A
	ALICE E. CR.	AWFORD JONES	·	Ž.	IN	EQUITY	
		RESPONDENT	!	Ŏ		· ·	

Now comes the Respondent and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demand 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 grees that this cause be submitted for final decree without further notice.

/s/ Alice E. Crawford Jones

STATE OF ALABAMA

BALDWIN COUNTY

I, C. LeNoir Thompson, a Notary Public, in and for said County, in said State, hereby certify that Alice E. Crawford Jones, 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, se executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 14 day of September, 1951.

/s/ C. LeNoir Thompson
Notary Public,
Baldwin County, Alabama

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Witness' Fees, \$_

THE STATE OF ALABAMA Baldwin County

Circuit Court

KNOW YE: that we, having full faith in your prudence and competency, have appointed your ommissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examine Karshall Eugene Jones and John E. Jones witnesses in behalf of Complainant in a cause pending in our ircuit Court in Baldwin County, of said State, wherein Karshall Eugene Jones Alice B. Grawford Jones Respondent oath, to be by you administered, upon Karshall Eugene Jones and John E. Jones Respondent to ath, to be by you administered, upon Karshall Eugene Jones and John E. Jones take and certify the deposition of the witness and return the same to our Court, with all take and certify the deposition.	KNOW YE: that we, having full faith in your prudence and competency, have appoint ommissioner, and by these presents do authorize you, at such time and place as you may a call before you and examine Marshall Eugene Jones and John E. Jones witnesses in behalf of Complainant in a cause pending ircuit Court in Baldwin County, of said State, wherein Marshall Eugene Jones , Complainant , Complain	
KNOW YE: that we, having full faith in your prudence and competency, have appointed your ommissioner, and by these presents do authorize you, at such time and place as you may appoint call before you and examine Marshall Eugene Jones and John E. Jones withesses in behalf of Complainant in a cause pending in our cruit Court in Baldwin County, of said State, wherein Karshall Eugene Jones Alice E. Crawford Jones Respondent to oath, to be by you administered, upon Marshall Eugene Jones and John E. Jones take and certify the deposition of the witness and return the same to our Court, with all invenient speed, under your hand. Witness day of 194.	KNOW YE: that we, having full faith in your prudence and competency, have appoint ommissioner, and by these presents do authorize you, at such time and place as you may a call before you and examineMarshall Eugene Jones and John E. Jones	· · · · · · · · · · · · · · · · · · ·
KNOW YE: that we, having full faith in your prudence and competency, have appointed your commissioner, and by these presents do authorize you, at such time and place as you may appoint to call before you and examine	KNOW YE: that we, having full faith in your prudence and competency, have appoint commissioner, and by these presents do authorize you, at such time and place as you may a call before you and examineMarshall Eugene Jones and John E. Jones	i !
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 examineWarshall Eugene Jones and John E. Jones	KNOW YE: that we, having full faith in your prudence and competency, have appoint commissioner, and by these presents do authorize you, at such time and place as you may a call before you and examine Marshall Eugene Jones and John E. Jones switnesses in behalf of Complainant in a cause pending circuit Court in Baldwin County, of said State, wherein Marshall Eugene Jones	:
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Respondent noath, to be by you administered, upon Marshall Eugene Jones and John E. Jones take and certify the depositions of the witness and return the same to our Court, with all onvenient speed, under your hand. Witness day of, 194	Eircuit Court in Baldwin County, of said State, wherein Marshall Eugene Jones , Compla	***************************************
Respondent noath, to be by you administered, upon Marshall Eugene Jones and John E. Jones take and certify the depositions of the witness and return the same to our Court, with all onvenient speed, under your hand. Witness day of, 194	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 Marshall Eugene Jones and John E. Jones s witnesses in behalf of Complainant in a cause pending in our Courtin Baldwin County, of said State, wherein Marshall Eugene Jones Alice E. Crawford Jones Respondent on eath, to be by you administered, upon Marshall Eugene Jones and John E. Jones on take and certify the deposition of the witness and return the same to our Court, with all other and certify the deposition of the witness and return the same to our Court, with all other and certify the deposition of the witness.	
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n oath, to be by you administered, upon <u>Marshall Eugene Jones and John E. Jones</u> o take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand. Witness day of	nd Alice B. Grawford Jones	
n oath, to be by you administered, upon <u>Marshall Eugene Jones and John E. Jones</u> of take and certify the deposition of the witness and return the same to our Court, with all onvenient speed, under your hand. Witness day of		
n oath, to be by you administered, upon <u>Marshall Eugene Jones and John E. Jones</u> of take and certify the deposition of the witness and return the same to our Court, with all onvenient speed, under your hand. Witness day of		
n oath, to be by you administered, upon <u>Marshall Eugene Jones and John E. Jones</u> of take and certify the deposition of the witness and return the same to our Court, with all onvenient speed, under your hand. Witness day of	Respon	ndent
o take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand. Witness day of	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 ** **Brishall Eugene Jones and John E. Jones** as witnesses in behalf of ** Complainant** in a cause pending in our Circuit Court in Baldwin County, of said State, wherein ** Barshall Eugene Jones** ** Respondent** and ** Alice E. Crawford Jones** ** Respondent** on oath, to be by you administered, upon ** **Barshall Eugene Jones** and John E. Jones** to take and certify the deposition** of the witness** and return the same to our Court, with all convenient speed, under your hand. ** Witness** day of ** 194**.	
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and the second s	onvenient speed, under your hand.	
	Witness day of	
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No.	
THE STATE OF AL. Baldwin Cour	
CIRCUIT CO	URT
MARSHALL EUGENE JONES	
vs.	Complainant
ALTON E. CREWBORD JONES	
	Defendant
COMMISSION TO TAKE I	PEPOSITION
COMMISSIONEI LOIS PAUL	R:
WITNESSES:	
MARSHALL EUGENE JONES	Management of the state of the
JOHN E. JONES	<u> </u>

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THE MEMBERS OF THE PROPERTY OF

Register.

Marshall Eugene J	ones	
	:	_ THE STATE OF ALABAMA
	· · · · · · · · · · · · · · · · · · ·	- Baldwin County
vs.		
Alice E. Crawford	Jones	
		IN EQUITY
		- Circuit Court of Baldwin Count
		- Circuit Coart of Baidwin Count
		aint upon the original Bill of Complaint,
nd in behalf of Defendant	upon	
nd in behalf of Defendant	upon	
nd in behalf of Defendant	upon	·
nd in behalf of Defendant	upon	

No		· :	0)		
	TATE OF Baldwin Co		MA		
	IN EQUI		ounty		
Мал	shallEugene	Jones			
•			: 	The state of the s	(B
	vs.				
Ali	ce E.Crawfor	d Jones			
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day of	Mec.		19 4 7		
<i>\</i>	with the	Regis	ster.		

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