

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Leon L. Long

vs.

, Complainant

Edith J. Long

, Respondent

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

_____ 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 Leon L. Long _____ is forever divorced from the

said Edith J. Long _____ for and on account of

Voluntarily abandonment.

It is further ordered, adjudged and decreed that the Complainant, Leon

L. Long, is hereby awarded the care, custody and control of Ronald D. Long

and Linda Joyce Long, both minor children of the parties hereto, and that

the said Edith J. Long, the Respondent, shall have the right to visit the

said minor children at reasonable hours and at reasonable intervals.

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 Leon L. Long _____
the Complainant _____ pay the cost herein to be taxed, for which execution may issue.

This 29th day of November, 1951

William J. Washburn 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 29th day
of November, 1951

Alice J. Duck

Register of Circuit Court, In Equity.

No. 2,757 Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

JUL 8 1952

ALICE J. DUCK, Register

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

LEON L. LONG

, Complainant

vs.

EDITH J. LONG

, 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 Leon L. Long

said Edith J. Long for and on account of

A voluntarily abandonment. It is further ordered, adjudged and decreed

that the Complainant, Leon L. Long, is hereby awarded the care, custody and

control of Ronald D. Long and Linda Joyce Long, both minor children of the

parties hereto, and that the said Edith J. Long, the Respondent, shall have the

right to visit the said minor childred at reasonable hours and at reasonable intervals.

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

Leon L. Long

the Complainant

pay the cost herein to be taxed, for which execution may issue.

This 29th day of November, 1951

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 6th day of March, 1953

Register of Circuit Court, In Equity.

No. _____ Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

The State of Alabama, Baldwin County

Circuit Court, In Equity

LEON L. LONG

, Complainant

vs.

EDITH J. LONG

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confession~~ 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 Leon L. Long is forever divorced from the said Edith J. Long for and on account of voluntarily abandonment.

It is further ordered, adjudged and decreed that the Complainant, Leon L. Long, is hereby awarded the care, custody and control of Ronald D. Long and Linda Joyce Long, both minor children of the parties hereto, and that the said Edith J. Long, the Respondent, shall have the right to visit the said minor children at reasonable hours and at reasonable intervals.

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 Leon L. Long the Complainant pay the cost herein to be taxed, for which execution may issue.

This 29th day of November, 1951.

Josiah J. Mosley
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. 2750 Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

LEON L. LONG

Complainant

vs.

EDITH J. LONG

Respondent

DIVORCE DECREE

FILED

NOV 29 1951

ALICE J. DUCK, Register

LEON L. LONG

COMPLAINANT

VS

EDITH J. LONG

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 2750

TO HONORABLE TEMPAIR J. LASHBURN JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, IN EQUITY;

Now comes the Respondent, Edith J. Long, and respectfully represents
and shows unto your Honor and this Honorable Court as follows:

1.

That on November 29, 1951, a decree of divorce was granted by this
court wherein Leon L. Long was Complainant and Edith J. Long Respondent;
that a copy of said divorce is hereto attached marked Exhibit A, and asked
to be taken as a part hereof as though herein fully set out.

2.

~~That in, by and as a part of said decree the two children of the Com-~~
plainant and the Respondent: Ronald D. Long and Linda Joyce Long both minors
were awarded to the Complainant with the right of the Respondent to visit
with the said children at reasonable hours and at reasonable intervals.

3.

That the Complainant Leon L. Long is now in Amarillo, Texas, in the
Air Service; that so far as this Respondent knows this Complainant has not
remarried; that he has left the minor children, Ronald D. Long and Linda
Joyce Long with their maternal Grandfather and Grandmother, Walter Jones
and Irene Jones, in Bay Minette, Alabama.

4.

That the Respondent since the granting of said divorce has remarried
and now has a home in Pensacola, Florida; and that she is fully capable
and financially responsible to care and provide for the said minor children
in the manner in which they should be provided for.

5.

That the said minor children: Ronald D. Long and Linda Joyce Long,
are now four and two years of age respectively.

6.

That due to the tender years of the said minors they are in need of

their mother's care; that their maternal grandfather and grandmother are of mature age and the said children are more or less a burden to them.

7.

That the Respondent and her husband are planning on a vacation leaving Pensacola, Florida, Thursday night next and plan to visit through the North and into Canada the home of the husband of the Respondent; that it would be beneficial to the said children that they be permitted to take the trip with the Respondent, their mother and her husband.

8.

That the Respondent is now married to Charles Dean, who is presently employed with Link Aviation Inc., at Corry Field, near Pensacola, Florida.

WHEREFORE, the premises considered, your Respondent prays that such orders and decrees may be made and entered and notices given as to place the matters herein alleged in issue; that Your Honor will forthwith enter an order and decree permitting the Respondent, Edith J. Long Dean, the custody and control of the said minor children so that she may take them on the vacation trip; that your Respondent further prays that upon a final hearing hereof the decrees heretofore entered in this cause be modified so as to award to this Respondent the permanent care, custody and control of the minor children, Ronald D. Long and Linda Joyce Long, subject to the right of the Complainant, Leon L. Long to visit with them at reasonable hours and at reasonable intervals.

Edith J. Long Dean
Charles Dean
Attorneys

The Complainant's address is: Amarillo Air Force Base, C/o Station Hospital, Amarillo, Texas.

LEON L. LONG

COMPLAINANT

VS

EDITH J. LONG

RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY

NO. 2750

This cause coming on to be heard is submitted upon the petition of the Respondent, Edith J. Long Dean to be awarded the custody of the minor children, Ronald D. Long and Linda Joyce Long, that they may take a vacation trip extending over a period of time ending July 26th or about that date; and

It appearing to the court that the request of the petitioner is reasonable and that it will be to the interest of the said minors that they take the said trip; and

It further appearing to the court that the said minor children are now in the custody of their maternal grandfather and grandmother, Walter Jones and Irene Jones of Bay Minette, Alabama.

It is the opinion of the court that the Respondent, Edith J. Long Dean, is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the court that the said Edith J. Long Dean be awarded the custody of the said minor children for the time ending July 26, 1952, at which time she is to return the said children to their maternal grandfather and grandmother, subject to the further orders of this court.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED by the court that the said Walter Jones and Irene Jones be and they are hereby directed and ordered to surrender the custody of the said minor children to the Respondent, Edith J. Long Dean.

Dated this 6th day of July, 1952.

Julius J. Mashburn, Jr.
JUL 11 1952

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

LEON L. LONG

Complainant

VS.

EDITH J. LONG

Respondent

I, ALICE L. MILLER

as ~~Register and~~ Commissioner heretofore appointed by this Court
have called and caused to come before me Mrs. Walter Jones, a

witness named in the Requirement for Oral Examination, on the 29th day of November
1945, at the office of Chason & Stone, Attorney at Law
in Bay Minette, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Mrs. Walter Jones
doth depose and say as follows:

That her name is Mrs. Walter Jones and that she is over the age of twenty-one years and lives in Bay Minette, Alabama. That Edith J. Long, the Respondent named in this cause, is her daughter and that her daughter married Leon L. Long on October 25, 1946 and they lived together as man and wife until February 9, 1950, when Edith J. Long voluntarily abandoned Leon L. Long without just cause or legal excuse and they have not lived together as man and wife since February of 1950. That Leon L. Long is over the age of twenty-one years of age and is a resident of Bay Minette, Alabama. That he is presently in the Army and is stationed in Amarillo, Texas. That Edith J. Long is now living in Mobile, Alabama. That Leon and Edith had two children, Ronald D. Long who is now 3½ years of age and Linda Joyce Long who is now 1½ years old and both of the children are with Leon in Amarillo, Texas. That Edith Long is not a fit and proper person to have the care, custody and control of Ronald and Linda Joyce because she has repeatedly refused to give them the proper care required or to devote sufficient time to their needs. That Leon L. Long is a fit and proper person to have the care, custody and control of these children.

Mrs. Walter Jones.
Mrs. Walter Jones.

ORAL EXAMINATION.

I, Alice L. Miller, 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—and read over to her and she signed the same in the presence of myself and Norborne C. Stone

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness—or had proof made before me of the identity of said witness—; 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 29th day of November, 1951.

Alice L. Miller (L.S.)

NO 275-8 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

LEON L. LONG

vs. Complainant

EDITH L. LONG

Respondent.

Oral Deposition

Filed November 29, 1951

Alice L. Miller, Register.

Recorded in

Record

Vol. _____ Page _____

, Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT

TO: ALICE L. MILLER, BAY MINETTE, ALABAMA

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 Mrs. Walter Jones and Mrs. Elbert Wood

as witnesses in behalf of Leon L. Long in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Leon L. Long

_____, Complainant
and Edith J. Long

_____, Respondent

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

Witness 29th day of November, 1951

Alice L. Miller
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

vs. Complainant—

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

WITNESSES:

LEON L. LONG,

Complainant,

vs.

EDITH J. LONG,

Respondent.

THE STATE OF ALABAMA
Baldwin CountyIN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
the Answer and Waiver of the Respondent, demand for oral examination,
the oral depositions of Mrs. Walter Jones and Mrs. Elbert Wood

and in behalf of Defendant upon Answer and Waiver

Chason & Stone
By: Marlene P. Stone
Attorneys for Complainant

Alvin J. Hensck

Register.

m

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

LEON L. LONG

Complainant,

vs.

EDITH J. LONG,

Respondent.

NOTE OF TESTIMONY

Filed in Open Court this 29th

day of November, 1945.

Register.

THE STATE OF ALABAMA,
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

LEON L. LONG

Complainant

VS.

EDITH J. LONG

Respondent

I, Alice L. Miller

as ~~Register and~~ Commissioner ~~heretofore appointed by this Court~~
have called and caused to come before me Mrs. Elbert Wood

witness named in the Requirement for Oral Examination, on the 29th day of November
1945, at the office of Chason & Stone, Attorneys at Law
in Bay Minette, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Mrs. Elbert Wood
doth depose and say as follows:

That her name is Mrs. Elbert Wood and that she is over twenty-one years of age and lives in Bay Minette, Baldwin County, Alabama. That she is personally acquainted with Leon L. Long and Edith J. Long his wife and has known them for about five or six years. That both Edith and Leon are over 21 years of age and that Leon is now in the Army and stationed at Amarillo, Texas, and Edith is now in Mobile, Alabama. That Edith and Leon were married in 1946 and they lived together as man and wife until February, 1950, at which time Edith left Leon voluntarily for no good reason and that as far as she knows they have not lived together as man and wife since that time. That Edith and Leon have two children, Ronald who is 3½ years of age and Linda Joyce, who is 1½ years of age and that both of the children are now with Leon in Amarillo, Texas. That she does not believe that Edith is a fit and proper person to have the care and custody of the two children because of her past actions and that Leon is a fit and proper person to have the care and custody of the children because he is a very attentive father. That she is not related to either Leon or Edith in any way.

Mrs. Elbert Wood
Mrs. Elbert Wood.

ORAL EXAMINATION.

I, Alice L. Miller, 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—and read over to _____ and _____ signed the same in the presence of myself and Worborne C. Stone

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness—or had proof made before me of the identity of said witness—; 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 29th day of November, 1951.

Alice L. Miller (L. S.)

NO. 2750 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

LEON L. LONG

vs.

Complainant

EDITH J. LONG

Respondent.

Oral Deposition

Filed November 29, 1951

Alice L. Miller, Register.

Recorded in

Record

Vol. _____ Page _____

_____, Register.

LEON L. LONG
Complainant,
VS.
EDITH J. LONG
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from
Bay Minette....., in the County of Baldwin.....
Alabama, the place of trial of said cause, to-wit: Bay Minette, Alabama.....

2. That said complainant requires an oral examination of said witnesses before a commissioner appointed by the Register of this Court.

CHASON & STONE
BY: Melburn P. Stone
Solicitor for Complainant.

NOTE:

Complainant suggests the name of Alice L. Miller.....
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Melburn P. Stone
Solicitor for Complainant.

DEMAND FOR ORAL EXAMINATION.

.....
Complainant,

Vs.

.....
Respondent.

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

Filed this 29th day of Nov,

1967....

Reigel. Remick
Register.

LEON L. LONG

Complainant,

vs.

EDITH J. LONG,

Respondent.

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

ANSWER AND WAIVER

Comes now the Respondent, Edith J. Long, and for answer to the Bill of Complaint heretofore filed against her in said cause says as follows:

1. That she denies each and every allegation of the said Bill of Complaint and demands strict proof thereof.

And for further answer to said Bill of Complaint the Respondent hereby accepts service of a copy and notice of the filing of the said Complaint and hereby waives any further notice to her of the day set for hearing, the taking of testimony or the submission for final decree of the above styled cause and does hereby consent that the same may be submitted and testimony taken without further notice to her.

Edith J. Long
Edith J. Long

Sworn to and subscribed

before me this 5th

day of November, 1951.

Robert M. Haynes
Notary Public, Baldwin County, Texas.

ROBERT M. HAYNES
Notary

My Commission Expires June 1, 1953

72 275-0

Answer and Waiver

of

Edith J. Long



RECORDED

FILED

NOV 29 1951

ALICE J. DUCK, Register

STATE OF ALABAMA)

BALDWIN COUNTY)

IN THE CIRCUIT COURT - IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Edith J. Long 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 Leon L. Long, as Complainant, against Edith J. Long, as Respondent.

Witness my hand this _____ day of _____, 1951.

Register.

LEON L. LONG,

Complainant,

vs.

EDITH J. LONG,

Respondent.

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

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

Comes your Complainant and files this, his Bill of Complaint for divorce against Edith J. Long and respectfully represents and shows unto your Honor and unto this Court as follows:

FIRST:

That your Complainant is over the age of twenty-one years and a resident citizen of Baldwin County, Alabama, residing at Bay Minette, Alabama, and has been a resident citizen of said State all of his life; that the Respondent is over the age of twenty-one years and is presently residing in Mobile, Mobile County, Alabama, her more particular address being 808 North Carolina Avenue.

SECOND:

That your Complainant and the Respondent were married on heretofore to-wit, October 25, 1946, and they lived together as man and wife until February 9, 1950, when the Respondent voluntarily abandoned your Complainant without just cause or legal excuse and they have not lived together as man and wife since that time.

THIRD:

That two children were born to the Complainant and the Respondent from said marriage and their names and ages are as follows: Ronald D. Long, 3½ years old and Linda Joyce Long, 1½ years old; that both of said children are presently residing with your Complainant in Amarillo, Texas. Your Complainant further alleges that the Respondent is not a fit and proper person to have the care, custody and control of said children and that your Complainant is a fit and proper person to have the care, custody and control of said children.

PRAYER FOR PROCESS

The premises considered your Complainant prays that the Respondent, Edith J. Long, be made a party Respondent to this Bill of Complaint by the usual Writ of Process of this Honorable Court requiring her to plead, answer or demur within the time and under the penalties prescribed by the rules of this court and the Statutes in such cases made and provided.

PRAYER FOR RELIEF

Your Complainant prays that upon a final hearing of this cause that your Honor will grant unto the Complainant an absolute divorce from the said Respondent and that your Complainant, by the terms of said decree, be awarded the care, custody and control of the said minor children named above. Your Complainant further prays that your Honor will also allow your Complainant to remarry if he should see fit to do so. And your Complainant prays for such other, further, different and general relief as in Equity may be meet and proper.

CHASON & STONE

BY


Solicitors for Complainant