

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

SOLOMON JOHNSON

, Complainant

vs.

SADIE MAE JOHNSON

, 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

SOLOMON JOHNSON

is forever divorced from the

said SADIE MAE JOHNSON 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 payment of the cost of this suit.

It is further ordered that Solomon Johnson the Complainant pay the cost herein to be taxed, for which executed may issue.

This 16<sup>th</sup> day of January 19 58

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. 4202 Page 22

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

SOLOMON JOHNSON

Complainant

vs.

SADIE MAE JOHNSON

Respondent

**DIVORCE DECREE**

FILED  
JAN 26 1953  
ALICE J. DUCK, Registrar

THE STATE OF ALABAMA, {

BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)SOLOMON JOHNSON

COMPLAINANT

vs.

SADIE MAE JOHNSON

RESPONDENT

I, Betty Clark

as Register and Commissioner

have called and caused to come before me Solomon Johnson and Maggie Richardson

witness es named in the requirement for Oral Examination, on the 15th day of January,  
1958, at the office of Ernest M. Bailey, Attorney at Law,  
in Fairhope, Alabama, and having first sworn said witness es to speak the  
truth, the whole truth, and nothing but the truth, the said Solomon Johnson

and Maggie Richardson doth depose and say as follows:

## Testimony of Solomon Johnson:

My name is Solomon Johnson. I am the Complainant in the above styled cause. I am a bona fide resident of Baldwin County, Alabama and am over the age of twenty-one years.

The Respondent and I were married in Fairhope, Alabama in August, 1950 and lived together as husband and wife until April, 1956. At that time the Respondent voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time. The Respondent has abandoned my home on numerous other occasions prior to that time.

Solomon Johnson  
SOLOMON JOHNSON

## Testimony of Maggie Richardson:

My name is Maggie Richardson. I am over the age of twenty-one years. I have known the Complainant in the above cause during the period of his marriage to the Respondent and I know of my own personal knowledge that the Respondent abandoned the bed and board of the Complainant in April, 1956 and has remained away since that time.

Maggie Richardson  
MAGGIE RICHARDSON

I, Betty Clark as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witnesses es and read over to them and they signed the same in the presence of myself and Ernest M. Bailey at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof 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 15th day of January, 1958.

Betty Clark (L. S.)

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THE STATE OF ALABAMA, BALDWIN COUNTY			
IN CIRCUIT COURT, IN EQUITY			
COMPLAINANT		vs.	
RESPONDENT			
ORAL DEPOSITION			
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THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO: Betty Clark

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, as such time and place as you may appoint, to call before you and examine Solomon Johnson and Maggie Richardson

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Solomon Johnson

and Sadie Mae Johnson, Complainant

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

Witness 14th day of January, 1958

W. J. Clark  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 4202

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

SOLOMON JOHNSON

Complainant

VS.

Complainant

SADIE MAE JOHNSON,

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Betty Clark

WITNESSES:

Solomon Johnson

Maggie Richardson

SOLOMON JOHNSONComplainant

vs.

SADIE MAE JOHNSONRespondent

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, \_\_\_\_\_  
and Oral Testimony \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

and in behalf of Defendant upon Answer and Waiver  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Lawrence M. Sanders*  
ATTORNEY FOR COMPLAINANT*Alfred Drake*  
Register.

No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

**SOLOMON JOHNSON**

**Complainant**

**versus**

**vs.**

**SADIE MAE JOHNSON,**

**Respondent**

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of ..... , 194

**FILED**  
JAN 16 1958

**ALICE J. DUCK, Register**

**Register.**

Printed by the Baldwin Times



SOLOMAN JOHNSON,  
Complainant  
vs.  
SADIE MAE JOHNSON,  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ANSWER AND WAIVER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and to each and every paragraph thereof separately and severally, says:

1. Respondent admits the allegations of the first paragraph of the Bill of Complaint.
2. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.
3. Respondent admits the allegations of the third paragraph of the Bill of Complaint.

Respondent hereby accepts service of a copy of the Summons and Complaint in this cause and waives further service of the same. The Respondent also waives notice of taking of testimony in this cause and notice of submission of said cause and agrees that the testimony may be taken and the cause submitted without further notice to the Respondent.

Sadie Mae Johnson  
SADIE MAE JOHNSON

WITNESSES FOR RESPONDENT:

Lora Richardson

Mattie Richardson

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ANSWER AND WAIVER

SOLOMON JOHNSON,  
Complainant

versus

SADIE MAE JOHNSON,  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED  
JAN 16 1958  
ALICE J. DUCK, Register

1. Respondent admits the allegations of the third paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

2. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

3. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

4. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

5. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

6. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

7. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

8. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

9. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

10. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and the date of separation but denies all other allegations of the second paragraph and demands strict proof thereof.

DEED OF RECORD

WITNESSES FOR RESPONDENT:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

STATE OF ALABAMA )  
BALDWIN COUNTY )

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

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Sadie Mae Johnson to appear and plead, answer or demur, within thirty days from the services hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by Solomon Johnson, as Complainant, against Sadie Mae Johnson, as Respondent.

Witness my hand this the \_\_\_\_ day of January, 1958.

REGISTER

SOLOMON JOHNSON,  
Complainant  
versus

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

SADIE MAE JOHNSON,  
Respondent

Comes your Complainant, Solomon Johnson, and files this his Bill of Complaint for divorce against Sadie Mae Johnson, and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years and that your Complainant is a resident of Baldwin County, Alabama for more than one year next preceding the filing of this Bill of Complaint, residing in Fairhope, and the residence of the Respondent is in Mobile County, Alabama.

SECOND:

That the Complainant and the Respondent were married on, heretofore, to-wit, August, 1950, in Fairhope, Alabama and lived together as husband and wife until on , to-wit, April, 1956, at which time Respondent voluntarily abandoned the bed and board of the Complainant

and has remained away voluntarily since that time and the Complainant and Respondent have not lived together nor in anyway recognized each other as husband and wife.

THIRD:

That there were no children born of this marriage between your Complainant and the Respondent.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Sadie Mae Johnson be made a party defendant to this cause by the usual writ or process of this Honorable Court requiring her to appear and 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. That upon a final hearing of this Cause Your Honor will grant unto the Complainant an absolute divorce from said Respondent and that Your Honor will also decree that the Complainant be allowed to remarry if he sees fit. Your Complainant further prays for such other, further and different relief to which he may be entitled and as in duty bound he will ever pray.

  
SOLICITOR FOR COMPLAINANT

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SUMMONS AND BILL OF COMPLAINT

SOLOMON JOHNSON,  
COMPLAINANT  
VERSUS  
SADIE MAE JOHNSON,  
RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED  
JAN 16 1958  
ALICE J. DUCK, Register