DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

4211

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BETTY JEAN COPELAND, Complainant

vs.

JAMES C. COPELAND, 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 BETTY JEAN COPELAND is forever divorced from the said JAMES C. COPELAND for and on account of CRUELTY

IT IS FURTHER ORDERED ADJUDGED AND DECREED That the Complainant have the care custody and control of the minor children, Winnie Ellen Copeland and James C. Copeland Jr., with the right of the Respondent to visit them at reasonable times.

IT IS FURTHER ORDERED ADJUDGED AND DECREED ~~That the Respondent James C. Copeland pay to the Complainant, Betty Jean Copeland, the sum of TWENTY DOLLARS~~ ($20.00) Per week for the support of the said minor children.

It is futher 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 futher 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 futher ordered that James C. Copeland the Respondent pay the cost herein to be taxed, for which executed may issue.

This 23 day of January, 1958

Hubert M. Hall

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.

©GOES 115

LITHO IN U.S.A.

No._____ Page_____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

B ETTY JEAN COPELAND
Complainant

vs.

JAMES C. COPELAND

Respondent

DIVORCE DECREE

FILED
JAN 23 1958
ALICE J. BECK, Register

BETTY JEAN COPELAND	)	
COMPLAINANT	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
JAMES C. COPELAND	)	IN EQUITY
RESPONDENT	)	

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Betty Jean Copeland, respectfully shows unto your Honor and this Honorable Court as follows:

1.

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

2.

That the Complainant and the Respondent married at Orange, Texas on the 20th day of August, 1956, and lived together as husband and wife until on to-wit: July 17th, 1957.

3.

That on to-wit, July 17th, 1957, and on various occasions prior thereto, the Respondent cursed, threatened and abused your Complainant and threatened to do actual violence to her person, which would necessarily endanger her life and health; that the conduct of the Respondent was such as to give your Complainant every reasonable apprehension to believe and she did actually believe that if she continued to live with the Respondent he would do actual violence to her person, which would necessarily endanger her life and health.

4.

That there were born as fruits of this marriage two minor children, Winnie Ellen Copeland and James C. Copeland, Jr., who are now living with the Complainant in this cause; that the Complainant is a fit and proper person to have the care, custody, and control of the said minor children; That the Respondent is an able bodied man and is well able to support the said minor children.

PRAYER FOR PROCESS AND RELIEF

WHEREFORE, THE PREMISES CONSIDERED, Your Complainant prays that your Honor will by proper process make the said James C. Copeland, party Respondent to this Bill of Complaint requiring him 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 further prays that upon a final hearing hereof, your Honor will enter a decree forever barring the bonds of matrimony now existing between the Complainant and the Respondent; that the Complainant be awarded the care, custody and control of the heretofore mentioned minor children; That the Respondent be required to pay a suitable amount as support for the minor children; and that your Complainant be allowed the right to remarry should she so desire.

Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Betty Jean Copeland
Complainant

John V. Duck
Solicitor for Complainant

No. 4211

BETTY JEAN COPELAND

COMPLAINANT

VS.

JAMES C. COPELAND

RESPONDENT

BILL OF COMPLAINT

FILED

JAN 28 1958

ALICE J. BUCK, Register

386 Fairhope Ave. WA 8-8960

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.

August 2, 1960

Mrs. Alice J. Duck
Post Office Box 239
Bay Minette, Ala.

Dear Miss Alice,

Enclosed you will find a petition to modify custody in the above styled. You will note that you are to serve the copy on Complainant, Betty Jean Copeland Bramlett. Her address is 8141 Shore Drive, Lot 576, Norfolk, 3, Va.

Sincerely yours,

John V. Duck

JVD:ems

Sent
Cert. mail
8-4-60

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

FAIRHOPE
MAY 17
2 PM
1962
ALA.

POSTMARK OF DELIVERING OFFICE

INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

RETURN TO

REGISTERED NO.	NAME OF SENDER Alice J. Duck, Register
CERTIFIED NO. 379426	STREET AND NO. OR P. O. BOX Box 239
INSURED NO.	CITY, ZONE AND STATE Bay Minette, Alabama

POD Form 3811 Jan. 1958

C55—16—71548-4

Eq. . . . 4211

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Deliver *ONLY* to addressee ☐ Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE *(must always be filled in)*

James C. Copeland

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED: 5-17-62

ADDRESS WHERE DELIVERED *(only if requested in item #1)*

FILED
MAY 17 1962
ALICE L. QUINN
CLERK
REGISTER

C55—16—75548-4 GPO

BETTY JEAN COPELAND BRAMLETT	I	
Complainant	I	IN THE CIRCUIT COURT OF
VS	I	BALDWIN COUNTY, ALABAMA
JAMES C. COPELAND	I	IN EQUITY
Respondent	I	

PETITION TO MODIFY CUSTODY

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

Comes now the Respondent, James C. Copeland, in the above styled cause, respectifully shows unto your Honor in this Honorable Court as follows:

ONE: That your Respondent is a resident of Baldwin County, Alabama, and over the age of twenty-one years; that the complainant is a non-resident of the State of Alabama, and whose address is 8141 Shore Drive, Lot 576, Norfolk 3, Virginia, and who is over the age of twenty-one years.

TWO: That your Respondent and the Complainant were permenantly divorded from the bonds of matrimony by decree granted by the Circuit Court of Baldwin County, Alabama, on the 23rd day of January, 1958; and that under the said divorce decree the Complainant was awarded the permenant care, custody and control of the two minor children, Winnie Ellen Copeland, and James C. Copeland Jr.

THREE: That subsequent to the time of issuing of the said final decree of divorce in this cause, the complainant Betty Jean Copeland has married and that her married name is now Betty Jean Copeland Bramlett; and that subsequent to the time of the final decree of divorce being granted, this Honorable Court, the Complainant has removed the said children from the State of Alabama, but that the respondent now has posession of the said children.

FOUR: That the Complainant, Betty Jean Copeland Bramlett, has become addicted to the habitual use of alcohol, and is not a fit and proper person to have the care, custody and control of the heretofore mentioned minor children; in that she leaves the said minor children for long period s of time unattended, she beats them unmercifully, that they are not properly fed, clothed, nor do they have proper medical attention.

FIVE: Your Respondent further alleges that he verily believes that the Complainant, Betty Jean Copeland Bramlett, also uses narcotics and that the said children are in constant fear when in the posession of the Complainant.

PRAYER FOR RELIEF

WHEREFORE, the premises considered, your Respondent prays that your Honor will by proper process make the said Betty Jean Copeland Bramlett a proper party to this cause of action, requiring her to appear and plead, answer or demur to the same within the time and under the penalties perscribed by law and the practice of this Honorable Court.

Your Petitioner further prays that upon a final hearing hereof, your Honor will award the permenant care, custody, and control of the said minor children Winnie Ellen Copeland, and James C. Copeland Jr., to the respondent and not require your respondent to pay any further sum to the Complainant under the final decree of divorce.

Your Respondent further prays that your Honor will enter an order requiring the said heretofore mentioned minor children to remain within the jurisdiction of this court, until a final hearing hereof.

Your Respondent prays for such other further or different relief as in the premises he may be entitled to receive.

Respectfully submitted,

James C. Copeland

John V. Duck
Solicitor for Respondent

FILED
AUG 4 1960
ALICE J. DUCK, Registe

SUMMONS AND COMPLAINT

Moore Ptg. Co.

The State of Alabama,
Baldwin County.

Circuit Court, Baldwin County

No._____

_____TERM, 19____

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Betty Jean Copeland Bramlett

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against Betty Jean Copeland Bramlett, Defendant

by James C. Copeland, Plaintiff

Witness my hand this 1 day of Aug. 1960

Alice J. Luck, Clerk

No. 4211 Page

The State of Alabama
Baldwin County

CIRCUIT COURT

James C. Copeland

Plaintiffs

vs.

Betty Jean Copeland Bramlett

Defendants

Summons and Complaint

FILED

Filed AUG 4 1960 19

ALICE J. DUCK, Register Clerk

John V. Duck

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at
8141 Shore Drive
Lot 576, Norfolk, Va.

Received In Office

19

, Sheriff

I have executed this summons

this 19

by leaving a copy with

Sheriff

Deputy Sheriff

4211

#1-INSTRUCTIONS TO DELIVERING EMPLOYEE

☐ Deliver *ONLY* to addressee ☐ Show address where delivered

(Additional charges required for these services)

RETURN RECEIPT

Received the numbered article described on other side.

SIGNATURE OR NAME OF ADDRESSEE *(must always be filled in)*

Betty J. Bramlette

SIGNATURE OF ADDRESSEE'S AGENT, IF ANY

DATE DELIVERED

8-8-60

ADDRESS WHERE DELIVERED *(only if requested in item #1)*

AUG 10 1960

CLERK

CSS—16—71548-4 GPO

POST OFFICE DEPARTMENT
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

POSTMARK OF DELIVERING OFFICE

NORFOLK
AUG 8
3 30PM
6 1960
VA.

PRAY
FOR
PEACE

INSTRUCTIONS: Fill in items below and complete #1 on other side, when applicable. Moisten gummed ends and attach to back of article. Print on front of article RETURN RECEIPT REQUESTED.

RETURN TO

REGISTERED NO.	NAME OF SENDER Alice J. Duck, Register
CERTIFIED NO. 659205	STREET AND NO. OR P. O. BOX P.O. Box 239
INSURED NO.	CITY, ZONE AND STATE Bay Minette, Alabama

C55—16—71548-4

POD Form 3811 Jan. 1958

BETTY JEAN COPELAND BRAMLETT, Complainant	)	IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA
VS	)	IN EQUITY
JAMES C. COPELAND, Respondent	)	No. 4211

PETITION

TO THE HONORABLE HUBERT M. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY SITTING:

ONE: Comes now the Respondent, James C. Copeland, in the above styled cause, respectfully shows unto your Honor, and this Honorable court as follows:

ONE: That your Respondent is a resident of Baldwin County, Alabama, and over the age of twenty-one years; that the Complainant is a non-resident of the State of Alabama, and whose address is 8141 Shore Drive, Lot 576, Norfolk 3, Virginia, and whi is over the age of twenty-one years.

TWO: That your Respondent and the Complainant were permenantly divorced from the bonds of matrimony by decree granted by the Circuit Court of Baldwin County, Alabama, on the 23rd day of January, 1958; that under the said divorce decree, the complainant was awarded the permenant care, custody and control of the two minor children; Winnie Ellen Copeland, and JAmes C. Copeland, JR.

THREE: That subsequent to the time of issuing of thesaid final decree of divorce in this cause, the complainant, Betty Jean Copeland has married and that her married name is now Betty Jean Copeland Bramlett; and that subsequent to the time of the final decree of divorce being granted, this Honorable Court, the complainant has removed the said children from the State of Ala= bama, but that the respondent now has possession of the said chil= dren.

FOur; That subsequent to the filing of this petition, your petitioner filed in this court a petition to modify custody of the said minor children, Winnie Ellen Copeland and James C. Copeland, Jr., and that your respondent and the complainant entered into an agreement on the 1st day of December, 1960 concerning the

custody of said children.

FIVE: That in and by the terms of said agreement, the respondent was to have custody of the children during the school months of each year and the complainant was to have custody during the summer months; that the two minor children Winnie Ellen Copeland and James C. Copeland, Jr., who is now 13 years of age and who will be 14 years of age on the 1st day of October, 1962 and James C. Copeland, Jr., who is now eleven years of age, have refused to return to the complainant's home in Norfolk, Va., and that the said minor child, Winnie Ellen Copeland alleges that the living conditions in the complainant's home are not suitable for a child of her age and refuses to return to the complainant's home.

WHEREFORE, the premises considered, your respondent prays that your honor, will by proper process make the said Betty Jean Copeland Bramlett a proper party to this petition, requiring her to appear and 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 petitioner furtherprays that upon a hearing hereof, your honor will enter an order or decree allowing the two minor children to remain in the respondent's home during both the summer and winter months.

Your respondent further prays that your honor will enter an order requring the said heretofore mentioned minor children to remain within the jurisdiction of this court, until a final hearing is had in this court.

Your respondent further prays for such other different relief as in the premises he may be entitled to receive.

Respectfully submitted.

James C. Copeland

Solicitor for Complainant

STATE OF ALABAMA

BALDWIN COUNTY

Personally appeared before me the undersigned authority, James C. Copeland, who being by me first duly and legally sworn doth depose and sayd:

The matters and facts alleged in the foregoing petition are true and correct.

James C. Copeland

James C. Copeland

Sworn to and subscribed before me on this the 7th day of May, 1962.

Gab Ma Smith

Notary Public

FILED

MAY 10 1962

ALICE J. BUCK, CLERK REGISTER

4211

BETTY JEAN COPELAND BRAMLETT, Complainant	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
VS	)	IN EQUITY
	)	No. 4211
JAMES C. COPELAND, Respondent	)	
	)	

ORDER

This matter coming on to be heard upon the sworn petition of the respondent in said cause, and it appearing to the court from such petition that under the agreement of the parties, Complainant shall have the right to remove the minor children from the jurisdiction of the court; and it further appearing to the court thatneither party shall have the right to remove such children from the jurisdiction of the court until a hearing is had on the said petition, it is, therefore

ORDERED, ADJUDGED and DECREED by the Circuit Court of Baldwin County, Alabama, in equity, that the complainant is hereby enjoined and restrained from removing the minor children of the parties of Baldwin County, Alabama, until a final hearing is held on said petition; that pending a final hearing in this cause, the respondent shall keep the custody of the minor children in his possession in Baldwin County, Alabama.

The court hereby retains jurisdiction of this cause for such other and further orders and decrees as may be rendered in the premises.

It is further ordered that a copy of this order shall be served on the complainant by registered mail at: 8141 ~~Ka~~ Shore Drive, Lot 576, Norfolk 3, Va..

Done this the 10 day of May, 1962.

Hubert M. Hare

Judge of the Circuit Court of
Baldwin County, Alabama

FILED
MAY 10 1962
ALICE L. DUCK, CLERK
REGISTER

BETTY JEAN COPELAND	)	
COMPLAINANT	)	IN THE CIRCUIT COURT OF
VS.	)	BALDWIN COUNTY, ALABAMA
JAMES C. COPELAND	)	IN EQUITY
RESPONDENT	)	

ANSWER AND WAIVER

Now comes the Respondent, in his own proper person, and admits the allegations contained in the Bill of Complaint filed in the above styled cause as to ages, residence, marriage and children, but denies all other allegations therein contained and demands 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.

James C. Copeland
Respondent

STATE OF ALABAMA

BALDWIN COUNTY

I, _____, a Notary Public, in and for said County, in said State, hereby certify that James C. Copeland, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day, that, being informed of the contents of said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 22 day of Jan, 1958.

Notary Public

4211

PETTY JEAN COPELAND

COMPLAINANT

VS.

JAMES C. DOPELAND

RESPONDENT

ANSWER AND WAIVER

FILED
JAN 23 1958
ALICE J. BUCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Ophelia J. Quinley

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 Betty Jean Copeland and Lois Williams

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

Betty Jean Copeland, Complainant

and

James C. Copeland Respondent

on oath, to be by you administered, upon Betty Jean Copeland and Lois Williams to take and certify the deposition of the witness es and return the same to our Court, with all convenient speed, under your hand.

Witness 23 day of June, 1958.

Alice J. Hinck
Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

BETTY JEAN COPELAND

Complainant

VS.

JAMES C. COPELAND

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

ORAL DEPOSITION

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

BETTY JEAN COPELAND Complainant

VS.

JAMES C. COPELAND Respondent

I, Ophelia Quinley

as Register and Commissioner

have called and caused to come before me Betty Jean Copeland and Lois Williams

witness es named in the Requirement for Oral Examination, on the 22 day of January 1958, at the office of John V. Duck in Fairhpe, Alabama, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Betty Jean Copeland and Lois Williams doth depose and say as follows:

My names is Betty Jean Copeland. I am the Complainant in the above styled cause and over the age of 21 years and I am a bona fide resident of Baldwin County, Alabama; The Respondent, James C. Copeland is over the age of 21 years and is a resident of Baldwin County, Alabama.

The Respondent and I were married at Orange Texas, on the 20th day of August, 1956, and lived together as husband and wife until on to-wit; July 17th, 1957.

On July 17, 1957, and on various occassions prior thereto the Respondent threatened and abused me and threatened to do actual violence to my person which would necesarrily endanger my life and health; that the conduct of the Respondent was such as to give me every reasonable apprehension to believe and I did actually believe that if I continued living with the Respondent, he would do actual violence to my person which would necessarily endanger my life and health; We have two minor children, Winnie Ellen Copeland and James C. Copeland Jr., who are now living with me and have been every since the Respondent and I separated. That I am a suitable and proper person to have their care custody and control. That the Respondent is an able bodied man, and is capable of supporting said minor children.

Betty Jean Copeland
Betty Jean Copeland

Testimony of Lois Williams.

My name is Lois Williams. I have known the Complainant and the Respondent throughout their married life. They have had trouble from the beginning of their marriage. I believe that the Complainant would be a suitable and proper person to have the care custody and control of their minor children. I belive that it would be to the best interest of all concerned that this divorce be granted.

Lois Williams
Lois Williams

ORAL EXAMINATION.

I, Ophelia Quinley, 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 John V. Duck 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 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 22 day of January, 195 8.

Ophelia Quinley (L. S.)

NO. 4211 PAGE

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

BETTY JEAN COPELAND
vs. Complainant

JAMES C. COPELAND
Respondent.

Oral Deposition

Filed, 195

FILED
JAN 8 1958
ALICE J. DUCK, Register

Recorded in
Vol. Page Record

, Register

8581—NOTE OF TESTIMONY

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

BETTY JEAN COPELAND

vs.

JAMES C. COPELAND

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, Testimony of Betty Jean Copeland and Lois Williams

and in behalf of Defendant upon answer and waiver

Register.

No. 421

THE STATE OF ALABAMA
Baldwin County

IN EQUITY

Circuit Court of Baldwin County

VS.

Note of Testimony

Filed in Open Court this _____

day of _____ FILED _____, 19____

JAN 23 1958

Register.

LEE L. PARK, Register

MOORE PRINTING CO., BAY MINETTE, ALA.