

(2869)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County  
CIRCUIT COURT, IN EQUITY

LETHA JONES, Complainant  
vs.

THADDEUS JONES, 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 Letha Jones is forever divorced from the said Thaddeus Jones for and on account of Cruelty

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, by the court, that the Complainant be and she is hereby permitted resume her former name, Letha Parsons

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

This 19<sup>th</sup> day of August, 1952.

Jelfair J. Markberry  
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. 2869 Page \_\_\_\_\_

The State of Alabama  
Baldwin County

In Circuit Court, In Equity

Letha Jones

Complainant

vs.

Thaddeus Jones

Respondent

**DIVORCE DECREE**

**FILED**  
AUG 19 1952

ALICE J. DUCK, Register

Letha Jones

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

vs.

Thaddeus Jones

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

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, \_\_\_\_\_

Answer and waiver of the Respondent and testimony of Letha Jones and

Ethel Catrett

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

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

\_\_\_\_\_

*[Handwritten Signature]*  
\_\_\_\_\_  
*[Handwritten Signature]*  
\_\_\_\_\_

*[Handwritten Signature]*  
\_\_\_\_\_  
Register.

No. ....

A

THE STATE OF ALABAMA  
Baldwin County

IN EQUITY  
Circuit Court of Baldwin County

Letha Jones

vs.

Thaddous Jones

NOTE OF TESTIMONY

Filed in Open Court this .....

day of ....., 194.....

FILED

Register.

AUG 19 1954  
Printed by the Baldwin Times

ALICE J. DUCK, Register

Letha Jones,  
Complainant,

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

VS

IN REPLY

Thaddeus Jones,  
Respondent

Now comes the Respondent in his own proper person and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, residences and marriage, but denies all other allegation and demands strict proof of the same.

The Respondent waives notice of the time of taking testimony of the Complainant; the right to cross examine the Complainant's witnesses, and agrees that this cause be submitted without further notice for final decree.

Thaddeus Jones

STATE OF ALABAMA  
BALDWIN COUNTY

I, Shirley, A notary Public, in and for said County, in said state, hereby certify that Thaddeus Jones, 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 16<sup>th</sup> day of August, 1952.

Shirley  
Notary Public, Baldwin County, Alabama

2869

RECORDED

\*\*\*

LETHA JONES

COMPLAINANT

VS

THADDEUS JONES

RESPONDENT

ANSWER AND WAIVER

FILED

AUG 19 1952

ALICE J. BUCK, Register

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons THADDEUS 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 LETHA JONES, as Complainant and against Thaddeus Jones, as Respondent.

WITNESS my hand this the \_\_\_\_\_ day of August, 1952.

REGISTER

-----

LETHA JONES		
COMPLAINANT		IN THE CIRCUIT COURT OF
VS		BALDWIN COUNTY, ALABAMA,
THADDEUS JONES		IN EQUITY
RESPONDENT		

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

Your Complainant, Letha 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 over twenty-one years of age; that the Respondent is a resident of the State of Alabama, and over twenty-one years of age.

2.

That your Complainant and the Respondent married at Lucedale, Mississippi, on December 4, 1951 and lived together as husband and wife, in Baldwin County, Alabama, until in April 1952.

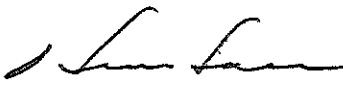
3.

That the Respondent drank to excess and while under the influence of liquor he often threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health; that on several occasions the Respondent committed actual violence to the Complainant by striking her which necessarily endangered her life and health; that the conduct of the Respondent was such as to give her every reasonable apprehension to believe and she did actually believe that

if she continued to live with him he would carry out his threats and do further violence to her person which would necessarily endanger her life and health.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Thaddeus Jones, party respondent to this cause of action, 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 prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her 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.

  
Solicitor for the Complainant



#2869

**RECORDED**

LETHA JONES

COMPLAINANT

VS

THADDEUS JONES

RESPONDENT

BILL OF COMPLAINT

**FILED**

AUG 19 1952

ALICE J. BUCK, Register

**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Letha Jones

Complainant

VS.

Thaddeus Jones

Respondent

I, Evelyn Watts

as Registrar and Commissioner

have called and caused to come before me Letha Jones and Ethel Catrett

witness ES named in the Requirement for Oral Examination, on the 16 day of August  
19452, at the office of Hubert M. Hall

in Bay Minette, Alabama, and having first sworn said Witness ES to speak the  
truth, the whole truth, and nothing but the truth, the said Letha Jones and Ethel Catrett  
doth depose and say as follows:

My name is Letha Jones. I am over twenty-one years of age, and a bona fide resident of 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, Thaddeus Jones, is over twenty-one years of age, and a resident of the State of Alabama.

The Respondent and I were married at Lucedale, Mississippi, on December 4, 1951. We lived together as husband and wife, in Baldwin County, Alabama, until in April 1952, when, for reason of the conduct of the Respondent, I was forced to cease living with him.

The Respondent drinks to excess and while under the influence of liquor he often threatened and abused me and threatened to do actual violence to my person which would necessarily endanger my life and health; that on several occasions he committed actual violence to my person by striking me which of necessity endangered my life and health. 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 to live with him he would carry out his threats and do further violence to my person which would necessarily endanger my life and health. The conduct of the Respondent was such as to render it absolutely impossible for the Respondent and me to live together as husband and wife. My name was Letha Pannone before my marriage to the Respondent. The Respondent and I have no children, however, I have a son by a former marriage and wish that my former name, Letha Pannone, be restored to me. I am a nurse by profession and have made use of my former name and therefore sincerely wish that it can be restored to me.

Letha Jones

My name is Ethel Catrett. I am a resident of Stockton in Baldwin County, Alabama. I am the mother of the Complainant in this cause and during the time she lived with the Respondent I had occasion to see her from time to time. I know that the conduct of the Respondent was such as to render it absolutely impossible for her to live with him. I know it is to the best interest of all parties concerned that a divorce be granted. The Respondent threatened and abused the Complainant. His treatment of the Complainant was such as to render it absolutely impossible for them to live together.

Ethel Catrett

ORAL EXAMINATION.

I, Evelyn Watts, 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 Hubert H. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proom 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 16 day of August, 1945

Evelyn Watts (L. S.)

NO. 2869 PAGE

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Letha Jones

vs. Complainant

Thaddeus Jones

Respondent.

Oral Deposition

Filed \_\_\_\_\_, 1945

Register.

Recorded in

Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.

FILED

AUG 19 1945

ALICE J. ONCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Evelyn Watts

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 Lotha Jones and Ethel Catrett

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Lotha Jones

\_\_\_\_\_ , Complainant  
and Thaddeus Jones

\_\_\_\_\_ Respondent

on oath, to be by you administered, upon Lotha Jones and Ethel Catrett  
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 66 day of August, 1942

Amey J. Church  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_

No. 2869

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Letha Jones

Complainant

vs.

Thaddeus Jones

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Wesley Tabbs

WITNESSES:

Letha Jones

Wheeler Cottrell

FILED

APR 19 1952

ALICE J. DUCK, Register

*[Faint, mostly illegible text and markings, possibly bleed-through from the reverse side of the page.]*