

4194

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

NETTIE L. JONES, Complainant

vs.

WALTER J. JONES Jr., Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, 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 Nettie L. Jones is forever divorced from the said Walter J. Jones Jr. for and on account of Abandonment.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, That the Complainant, Nettie L. Jones, shall have the permanent care, custody and control of the minor child, Karen Cecile Jones, age about four years.

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 Nettie L. Jones the Complainant pay the cost herein to be taxed, for which executed may issue.

This 24 day of October 1958

[Signature]

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.----- Page-----

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

NETTIE L. JONES

Complainant

vs.

WALTER J. JONES Jr.

Respondent

DIVORCE DECREE

NETTIE L. JONES

vs.

WALTER J. JONES Jr.

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 Nettie L. Jones and Ralph S. Carpenter

and in behalf of Defendant upon Answer and Waiver

*C. L. Davis Thompson*

*Alice J. Luck*  
Register.

No. ....

**THE STATE OF ALABAMA**

**Baldwin County**

**IN EQUITY**

**Circuit Court of Baldwin County**

NETTIE L. JONES

vs.

WALTER J. JONES Jr.

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of **FILED**, 194

OCT 17 1958

ALICE J. DUCK, Register

Register.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

NETTIE L. JONES COMPLAINANT

vs.

WALTER J. JONES Jr. RESPONDENT

I, Lois Wilson

as Register and Commissioner

have called and caused to come before me Nettie L. Jones and Ralph S. Carpenter

witness<sup>es</sup> named in the requirement for Oral Examination, on the 17th day of October 19 58, at the office of C. LeNoir Thompson

in Bay Minette, Alabama, and having first sworn said witness<sup>es</sup> to speak the

truth, the whole truth, and nothing but the truth, the said Nettie L. Jones and Ralph S.

Carpenter doth depose and say as follows:

That my name is Nettie L. Jones, I am over the age of 21 and have been a resident of Alabama all my life. The Respondent is also over the age of 21 and resides in Baldwin County, Alabama. We were married on February 4, 1954 at Lucedale, Mississippi and lived together as husband and wife until on or about July 13, 1957 at that time the respondent abandoned me without fault on my part and we have not lived together since that date as husband and wife and I do not believe we will ever live together again. There was one child born as fruits of this marriage, Karen Cecile Jones, age about 4 years. Your Complainant respectfully shows that she has had the care, custody and control of this child since birth and the child is presently in her care, custody and control and she respectfully requests the permanent care, custody and control of this child. Your Complainant respectfully asks that she be granted a divorce in this cause and that the decree provide for her to have the permanent care, custody and control of said child.

*Nettie L. Jones*

That my name is Ralph S. Carpenter, I know both parties to this cause, they are both over the age of 21 and have been residents of Alabama more than two years next preceding. They were married on or about February 4, 1954 in Lucedale, Mississippi and lived together until their separation occurred about the middle of July, 1957 at which time the respondent abandoned the complainant without fault on her part. One child Karen Cecile Jones, age about 4 years, was born of this marriage and the complainant has had the care, custody and control of this child since her birth. I respectfully recommend that the complainant is a fit, suitable and proper person to have the permanent care, custody and control of this child and I do not believe the parties to this cause will ever live together again as husband and wife.

*Ralph S. Carpenter*

I, Lois Wilson 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 witness es and read over to them and they signed the same in the presence of myself and C. LeNoir Thompson

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 17th day of October, 1958.

Lois Wilson (L. S.)

No. \_\_\_\_\_ Page \_\_\_\_\_

**THE STATE OF ALABAMA**  
BALDWIN COUNTY

**IN CIRCUIT COURT, IN EQUITY**

NETTIE L. JONES

COMPLAINANT

WALTER J. JONES JR.

vs.

RESPONDENT

**ORAL DEPOSITION**

**FILED**

Filed OCT 17 1958, 1958

ALICE J. DUCK, Register  
RECORDED IN \_\_\_\_\_

Record

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

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County



Circuit Court

TO: LOIS WILSON

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 Nettie L. Jones and Ralph S. Carpenter

a witness in behalf of Nettie L. Jones in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein Nettie L. Jones

, Complainant

and Walter J. Jones Jr.

Respondent

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

Witness 17 day of Oct.

, 1958

*Alice J. Luck*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

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THE STATE OF ALABAMA  
Baldwin County

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CIRCUIT COURT

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NETTIE L. JONES

Complainant

VS.

WALTER J. JONES Jr.

Defendant

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COMMISSION TO TAKE DEPOSITION

---

COMMISSIONER:

LOIS WILSON

FILED

OCT 17 1958

WITNESSES: RICE J. DUCK, Register

NETTIE L. JONES

RALPH S. CARPENTER



NETTIE L. JONES  
COMPLAINANT

VS

WALTER J. JONES Jr.  
RESPONDENT

\* IN THE CIRCUIT COURT OF  
\*  
\* BALDWIN COUNTY, ALABAMA  
\*\*  
\* IN EQUITY.  
\*  
\* CASE NO. \_\_\_\_\_  
\*  
\*  
\*

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

The Respondent admits the allegations as the ages, marriage and residence, but denies all other allegations contained in the bill of complaint, 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.

Walter J. Jones Jr

STATE OF ALABAMA  
BALDWIN COUNTY

I, C. Davis Thompson, a Notary Public, in and for said County, in said State, hereby certify that Walter J. 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 on this the 17th day of October, 1958.

C. Davis Thompson  
Notary Public, Baldwin County, Alabama.

NETTIE L. JONES  
COMPLAINANT  
VS  
WALTER J. JONES Jr.  
RESPONDENT

*Handwritten notes and signatures in the right margin.*

\* \* \* \* \*

ANSWER AND WAIVER

\* \* \* \* \*

FILED  
OCT 17 1958  
ALICE J. DUCK, Register

STATE OF ALABAMA  
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon WALTER J. JONES, <sup>(Jr.)</sup> 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 NETTIE L. JONES as Complainant and against WALTER J. JONES, as Respondent.

WITNESS my hand this the 9 day of January, 1958.

Deice J. Welch  
Register.

\*\*\*\*\*

NETTIE L. JONES	*	IN THE CIRCUIT COURT OF
	*	
COMPLAINANT	*	BALDWIN COUNTY, ALABAMA
	*	
VS	*	IN EQUITY.
	*	
WALTER J. JONES (Jr.)	*	CASE NO. _____
	*	
RESPONDENT	*	
	*	

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

Your Complainant, Nettie L. Jones, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and a resident of the State of Alabama and has been more than two years next preceding; The Respondent is over the age of 21 and may be presently found at Sharon Cab Stand or Union Cab Stand, Conception Street at the Square.

2.

That your Complainant and the Respondent married at George County, Mississippi on February 4, 1954 and lived together as husband and wife in Baldwin County, Alabama until July 13, 1957.

3.

That on July 13, 1957, and on several occasions prior thereto the Respondent threatened and abused the Complainant and threatened to do actual violence to her person which would necessarily endanger her life and health. The conduct of the Respondent was such as to give the Complainant 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 actual violence to her persons, which would necessarily endanger her life and health.

4.

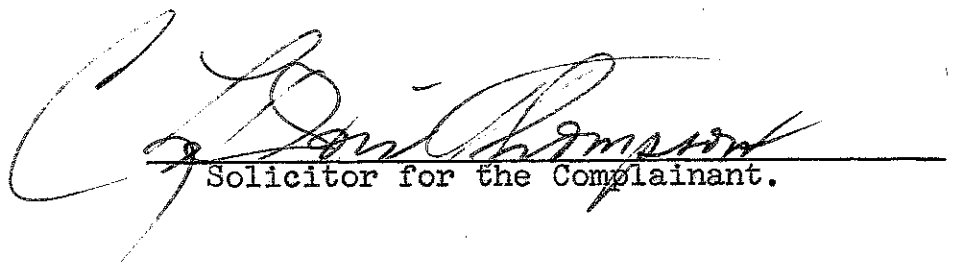
Your Complainant further avers and alleges that the said Respondent has, since her said marriage with him, become addicted to habitual drunkenness, and that said habit has continued to the filing of this bill.

5.

There was born as fruits of this marriage between the Complainant and the Respondent one child, Karen Cecile Jones, age about three years, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Walter J. Jones, <sup>(Jr)</sup> 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 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; that a decree be made awarding to the Complainant the care, custody and control of the minor child, Karen Cecile Jones, age about three years; Your 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.

8820  
R  
4194 235  
Baldwin

Nettie L. Jones  
vs.

Walter J. Jones Jr.  
JK  
ad

EXECUTED

This 7 day of Feb., 1958  
by serving a copy of the within on  
Walter J. Jones Jr.  
SHERIFF  
By J. Adams D.S.

800 N. Joachim

Shawnee, Okla. 74150  
Union, Okla. 74150  
Conceptone St.,  
The Hill, Okla.

Filed 1-9-58  
Russ J. Ulrich  
Register

AMENDED COMPLAINT

NETTIE L. JONES	)	IN THE CIRCUIT COURT OF
COMPLAINANT	)	BALDWIN COUNTY, ALABAMA.
VS	)	IN EQUITY.
WALTER J. JONES JR.	)	CASE NO. _____
RESPONDENT	)	

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

Your Complainant, Nettie L. Jones, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant is over the age of 21 and a resident of the State of Alabama and has been more than two years next preceding; The Respondent is over the age of 21 and may be presently found at Sharon Cab Stand or Union Cab Stand, Conception Street at the Square.

2.

That your Complainant and the Respondent married at George County, Mississippi on February 4, 1954 and lived together as husband and wife in Baldwin County, Alabama until July 13, 1957.

3.

That on to-wit July 13, 1957, while your Complainant and the Respondent were living together as husband and wife in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

There was born as fruits of this marriage between the Complainant and the Respondent one child, Karen Cecile Jones, age about three years, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Walter J. Jones, Jr., 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 hearing hereof, your Honor will enter an order and decree granting to her an absolute decree granting to her an absolute decree of divorce,

4194

NETTIE L. JONES

COMPLAINANT

VS

WALTER J. JONES, JR.,

RESPONDENT

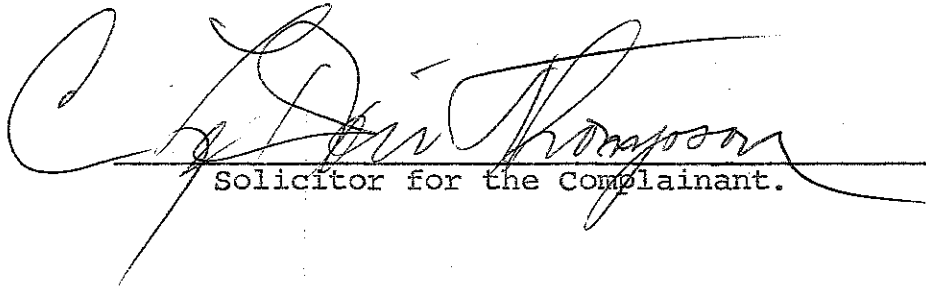
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AMENDED BILL OF COMPLAINT

\* \* \* \* \*

**FILED**  
OCT 22 1958  
ALICE J. DUCK, Register

forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to the Complainant the care, custody and control of the minor child, Karen Cecile Jones, age about three years; Your 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.