

No. 3357 Page -----

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Hortense Travis

Complainant

vs.

Jack Travis

Respondent

DIVORCE DECREE

FILED

OCT. 20 1954

ALICE J. DUCK, Register

The State of Alabama, } Circuit Court of Baldwin County, Alabama
Baldwin County. } (In Equity)

Hortense Travis Complainant

VS.

Jack Travis Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Hortense Travis and Frankie Nell Sprinkle

witnesses named in the Requirement for Oral Examination, on the 18 day of October
1954, at the office of Walters & Brantley
in Bay Minette, Alabama, and having first sworn said Witnesses to speak the
truth, the whole truth, and nothing but the truth, the said Hortense Travis and Frankie Nell
Sprinkle doth depose and say as follows:

My name is Hortense Travis. I am the Complainant in the above styled cause. Both the Respondent and I are over the age of twenty-one years and are bona fide resident citizens of Baldwin County, Alabama, and have so been for the past 12 months. We were married on May 30, 1947, in Lucedale, Mississippi. On June 30, 1954, my husband, the Respondent in this cause, did slap and strike me about my face and body and threatened to do me further bodily harm. From his actions I was reasonably convinced that he would do me harm which would endanger my life and health. I have not lived with him as man and wife since that date.

Hortense Travis

My name is Frankie Nell Sprinkle. On the night of June 30, 1954, I saw Hortense Travis and Jack Travis in Mack's place, Baldwin County, Alabama. I saw Jack strike Hortense several times about her face and body. In my opinion, if this continues it will do her great bodily harm.

Frankie Nell Sprinkle

ORAL EXAMINATION

I, Evelyn Watts, as ~~Register and~~ Commissioner hereby certify that the foregoing deposition S 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 Tolbert M. Braatley

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 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 18 day of October, 1954.

Evelyn Watts (L.S.)

No. 3387 Page _____

The State of Alabama
Baldwin County.

In Circuit Court, In Equity

Hortense Travis

vs. Complainant

Jack Travis

Respondent

Oral Deposition

Filed _____ 19__

FILED

Recorded in

NOV 1 1954, Register
Record

Vol. _____ Page _____, 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 Hortense Travis and Frankie Nell Sprinkle

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Hortense Travis is

Complainant
and Jack Travis is

Respondent
on oath, to be by you administered, upon Hortense Travis and Frankie Nell Sprinkle

to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 18 day of Oct, 1954

David J. ...
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 3389

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Hortense Travis

Complainant—

VS.

Jack Travis

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Evelyn Watts

WITNESSES:

Hortense Travis

Frankie Nell Sprinkle

Hortense Travis

Jack Travis

vs.

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 Hortense Travis and Frankie Nell Sprinkle, agreement

and in behalf of Defendant upon _____ answer and waiver, and agreement

*Walter D. Bailey
vs. J. J. Walker*

Leslie H. Hester
Register.

No. 3387

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Hortense Travis

vs.

Jack Travis

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194

FILED

OCT 18 1954

Register.

Printed by the Baldwin Times

ALICE J. JOCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons JACK TRAVIS 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 HORTENSE TRAVIS as Complainant and against Jack Travis as Respondent.

WITNESS my hand this the _____ day of October, 1954.

Register

HORTENSE TRAVIS

COMPLAINANT

VS

JACK TRAVIS

RESPONDENT

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

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

Your Complainant, Hortense Travis, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent are both bona fide resident-citizens of Baldwin County, Alabama, and have been for the past 12 months, and over the age of twenty-one years.

2.

That Your Complainant and the Respondent married in Lucedale Mississippi, on May 30, 1947, and lived together as husband and wife until on to-wit, June 30, 1954.

3.

That on, to-wit, June 30th, 1954, the Respondent committed actual violence to your Complainant by striking her and doing other violence to her person which necessarily endangered 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 him he would do further violence to her person which would necessarily endanger her life and health.

BOOK 016 PAGE 03

4.

There was born to our union two children, Patsy Regina Travis, age 5 and Janice Delorse Travis, age 2. That the Complainant and Respondent entered into a written agreement as to the custody, control and support of these children on October 6, 1954. This agreement is attached hereto and marked Exhibit "A" for the Complainant and made a part of this complaint as if herein fully set out.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Jack Travis 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; Your Complainant further prays that Your Honor will award the custody of Patsy Regina Travis and Janice Delorse Travis in the manner provided for in her agreement with the Respondent; said agreement being dated October 6, 1954, and attached to this bill of complaint; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

FILED

10-18-54

ALICE I. DUCK, Clerk

Walters & Brantley

BY: *E. J. Walters*
Solicitors for the Complainant

3387

HORTENSE TRAVIS
COMPLAINANT
VS
JACK TRAVYS
RESPONDENT

BILL OF COMPLAINT

FILED
18 1954
JACK L. BUCK, Register

WALTER S. BROWN

[Handwritten signature]

HORTENSE TRAVIS

COMPLAINANT

VS

JACK TRAVIS

RESPONDENT

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

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 and marriage, but denies all other allegations contained therein 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 the Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Jack D. Travis

STATE OF ALABAMA
BALDWIN COUNTY

I, TOLBERT M. BRANTLEY, a Notary Public, in and for said County, in said State, hereby certify that Jack Travis, 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 the instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 18th day of October, 1954.

FILED

10-18-54

ALICE J. DUCK, Clerk

Tolbert M. Brantley
Notary Public, Baldwin County, Alabama

3387

HORTENSE TRAVIS
COMPLAINANT
VS
JACK TRAVIS
RESPONDENT

ANSWER AND WAIVER

FILED

OCT 18 1954

ALICE J. BOCK, Register

STATE OF ALABAMA, 0
 0
 COUNTY OF BALDWIN. 0

THIS AGREEMENT made and entered into on this the 6th day of October, 1954, by and between JACK D. TRAVIS, hereinafter referred to as the party of the first part, and HORTENSE P. TRAVIS, hereinafter referred to as the party of the second part, WITNESSETH:

WHEREAS, the parties hereto are husband and wife, having inter-married at Lucedale, Mississippi, on May 30, 1947; and,

WHEREAS, the parties hereto, as a result of this marriage, have two children, PATSY REGINA TRAVIS, age five and JANICE DELORSE TRAVIS, age two; and,

WHEREAS, said parties have definitely concluded that under conditions now existing it is impracticable for them to live together as man and wife now, therefore, in consideration of the foregoing, and of the mutual agreement hereinafter made, they have mutually agreed to a complete separation under the following terms and conditions:

1. The said parties shall entirely and completely separate as man and wife, live separate and apart, and neither party hereafter shall in any way harass, threaten, intimidate, or otherwise act in any way so as to embarrass or humiliate the other party.

2. The party of the first part shall have the custody, control and support of the minor child, JANICE DELORSE TRAVIS, and the party of the second part shall have the custody, control and support of the minor child, PATSY REGINA TRAVIS. Each party hereto shall be entirely responsible for the support of the child of which he is given custody and control. It is understood and agreed, however, that the other party shall have the right at convenient times of access and visitation of the child, such access and visitation to be exercised in a proper and reasonable manner and at such times as may be convenient to and consented to by the party who has the custody, control and support of said child.

It is further understood and agreed that ^{if} the exigencies of education and other factors in the best interest of the child make it desirable that the times for the custody, control and support as herein agreed to be changed or modified, this agreement is subject to such modification or change by the joint consent of the parties hereto. It is further understood and agreed that neither ~~party~~ ^{child} shall be removed for any permanent period or permanent residence from the state of Alabama without the written consent of the other party.

This agreement has been made and executed by the parties hereto on the day and date hereinabove first set forth, in good faith, with full understanding of all of its provisions, and with the mutual promise on the part of each to comply therewith faithfully and completely.

Jack D. Travis
Hortense D. Travis

Executed in the presence of:

Julian J. Middlebury, Jr.

FILED
10-18-54
ALICE J. DUCK, Clerk

3387

STATE OF ALABAMA,
COUNTY OF BALDWIN.

SEPARATION AGREEMENT.

FILED
OCT 18 1954

ALICE J. DUCK, Register

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