

(3439)

DIVORCE DECREE

PRINTED BY MOORE FIG. CO.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

----- Katherine Lambert -----, Complainant

vs.

----- J.B. Lambert -----, 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 ----- Katherine Lambert ----- is forever divorced from the said ----- J.B. Lambert ----- for and on account of ----- Cruelty -----

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 ----- Katherine Lambert ----- the ----- Complainant ----- pay the cost herein to be taxed, for which executed may issue.

This ----- 11<sup>th</sup> ----- day of ----- January -----, 1955.

*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.

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

**DIVORCE DECREE**

THE STATE OF ALABAMA  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Katherine Lambert

Complainant

VS.

J. E. Lambert

Respondent

I, Grady P. Gilbert, Jr.

as Register and Commissioner

have called and caused to come before me Katherine Lambert and

witnesses named in the Requirement for Oral Examination, on the 10th day of January  
1955, at the office of James A. Hendrix  
in Robertsedale, Alabama, and having first sworn said Witness to speak the  
truth, the whole truth, and nothing but the truth, the said Katherine Lambert and  
doth depose and say as follows:

My name is Katherine Lambert. I am over twenty-one years old and have lived in Baldwin County for more than the past two years. J. E. Lambert is over twenty-one years old and lives in Robertsedale, Alabama. We were married March 25, 1949, at Pascagoula, Mississippi. On January 4, 1955, J. E. Lambert hit me so hard on my face that he left the print of his hand there and several times before this he had beat and hit me; he has made numerous threats of doing me physical harm and judging from his manner and conduct toward me, I am convinced that he will commit violence upon me that will endanger my life and health if I continue to live with him. As I said the last of these threats and assaults occurred about January 4, 1955, and since that time we have not lived together as husband and wife. We did not have any children.

Katherine Lambert

My name is Mae Kolar. I am over twenty-one years old and have lived in Baldwin County for many years. I am the mother of Katherine Lambert; she is over twenty-one and has lived in Baldwin County for more than the past two years. J. E. Lambert is over twenty-one years old and lives in Robertsedale, Alabama. They were married March 25, 1949, at Pascagoula, Mississippi. I was present when J. E. hit Katherine on the 4th day of January, 1955, so hard that he left the whole print of his hand on her face. This was not the first time that I had seen him hit her, he has made threats of doing her harm many times and I am convinced that if she continues to live with him, her life and health might be endangered; since January 4th when he hit her and threatened her they have not lived together as husband and wife. She has been living with me and he has been living with his brother. They did not have any children.

Mae Kolar

**ORAL EXAMINATION.**

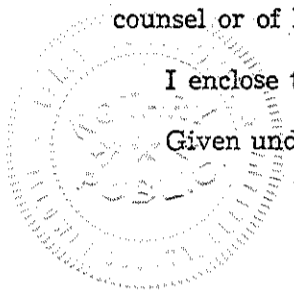
I, Grady P. Gilbert, Jr., as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself Grady P. Gilbert, Jr.

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 20th day of January, 1945

Grady P. Gilbert, Jr. (L. S.)  
Notary Public, Baldwin Co., Ala.



NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Katherine Lambert

vs. Complainant

J. R. Lambert

Respondent.

**Oral Deposition**

Filed \_\_\_\_\_, 194

**FILED**  
JAN 20 1945  
Register.

Grady P. Gilbert, Jr. Register  
Vol. \_\_\_\_\_ Page \_\_\_\_\_  
Record \_\_\_\_\_  
Register.

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Grady P. Gilbert, Jr.

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 Katherine Lambert and Mae Kolar

a witnesses in behalf of Katherine Lambert in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Katherine Lambert is

Complainant  
and J.B. Lambert is

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

Witness 4 day of January, 1955.

Alice J. Smith  
Register.

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

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

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

**THE STATE OF ALABAMA**  
**Baldwin County**

**CIRCUIT COURT**

Complainant \_\_\_\_\_

VS.

Defendant \_\_\_\_\_

**COMMISSION TO TAKE DEPOSITION**

COMMISSIONER:

WITNESSES:

*[Faint, mirrored text from the reverse side of the page is visible through the paper. The text is largely illegible but appears to contain legal proceedings or deposition testimony.]*

KATHERINE LAMBERT,		
Complainant,		IN THE CIRCUIT COURT OF
vs.		BALDWIN COUNTY, ALABAMA
J. B. LAMBERT,		IN EQUITY.
Respondent.		

ANSWER AND WAIVER

Comes now the Respondent, J. B. Lambert, and for answer to the Bill of Complaint heretofore filed against him in said cause, says as follows:

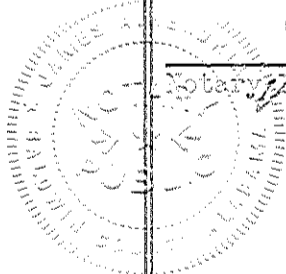
1. That he denies each and every allegation of the said Bill of Complaint and demands strict proof thereof.

And for further answer to the said Bill of Complaint the Respondent hereby accepts service of a copy and notice of the filing of the said Complaint and hereby waives any further notice to him of the day set for hearing, the taking of testimony or the submission for final decree of the above styled cause and does here consent that the same may be submitted and testimony taken without further notice to him.

*J. B. Lambert*  
\_\_\_\_\_  
J. B. Lambert

Sworn to and subscribed before me on this 10 day of January, 1955.

*James G. Hendrix*  
\_\_\_\_\_  
Notary Public, Baldwin County, Alabama.



FILED

1-11-55

ALICE I. ...

Katherine Lambert,  
 Complainant  
 vs.  
 J. B. Lambert,  
 Respondent

THE STATE OF ALABAMA  
 Baldwin County  
 IN EQUITY  
 Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,  
 answer and waiver, and the testimony of Katherine Lambert and  
 as set out in the oral deposition

and in behalf of Defendant upon

*James A. Hendrix*

*Wesley Johnson*  
 Register.



No. ....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

Katherine Lambert,

Complainant

vs.

J. N. Lamber,

Respondent

**NOTE OF TESTIMONY**

Filed in Open Court this .....

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

**FILED**  
**JAN 11 1955**

**ALICE J. DUCK, Register**  
Register.  
Printed By The Baldwin Times

STATE OF ALABAMA, BALDWIN COUNTY

KATHERINE LAMBERT,		
Complainant,		IN THE CIRCUIT COURT OF
vs.		BALDWIN COUNTY, ALABAMA
J. E. LAMBERT,		IN EQUITY.
Respondent.		

To the Honorable Judge of the Circuit Court of Baldwin County,

Sitting in Equity:

Comes now the Complainant, KATHERINE LAMBERT, humbly complaining of the Respondent, J. E. LAMBERT, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, KATHERINE LAMBERT, is over the age of twenty one years and is a resident of Baldwin County, Alabama, and has been a bona fide resident of said State for more than two years next preceding the filing of this Bill of Complaint; that respondent is over 21 years and lives in Robertsdale, Ala.

SECOND: That your complainant and respondent were lawfully married on or about, to-wit: March 25, 1949, at Pascagoula, Mississippi.

THIRD: Your complainant avers and charges that the said respondent did on or about the 4th day of January, 1955, and many times subsequent thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health; that the last of said assaults and threats did occur on about the 4th day of January, 1955, since which said time complainant and respondent have not lived together as husband and wife.

PRAKER FOR PROCESS

Wherefore the premises considered the complainant prays that the said J. E. Lambert be made party respondent to this her Bill of Complaint and that a summons be issued and served upon him as required by law and the rules of this

Honorable Court, and that he be required to plead, answer or demur to the within Bill of Complaint within the time and under the penalties prescribed by law and the rules of this Honorable Court.

PRAYER FOR FINAL RELIEF

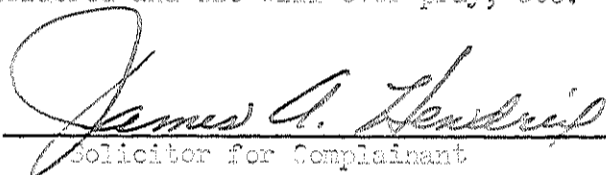
The premises considered the Complainant prays that on a final hearing of this cause Your Honor will make and enter a decree forever dissolving the bonds of matrimony heretofore existing between the Complainant and Respondent, and will grant to the Complainant a full and absolute divorce from the Respondent and that in and by virtue of the said decree the Complainant will be granted the right to again contract marriage.

Complainant prays all other further and general relief to which she may be entitled, the premises considered and she will ever pray, etc.

FILED

1-11-55

ALICE J. DUCK, Register

  
Solicitor for Complainant

BOOK 016 PAGE 200