

4307

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ETHEL MAE YOUNG

Complainant

vs.

JOE EDWARD YOUNG

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 ETHEL MAE YOUNG is forever divorced from the said JOE EDWARD YOUNG for and on account of Voluntary abandonment, and the Complainant given custody of the minor children born to this marriage.

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 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 further ordered that ETHEL MAE YOUNG the Complainant pay the cost herein to be taxed, for which executed may issue.

This 30 day of June 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.

No. ----- Page -----

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

ETHEL MAE YOUNG

Complainant

vs.

JOE EDWARD YOUNG

Respondent

DIVORCE DECREE

E. G. RICKARBY,
Attorney for
Complainant.

FILED

JUL 3 1958

ALICE J. DICK, Register

ETHEL MAE YOUNG,	¶	IN THE CIRCUIT COURT OF
Complainant,	¶	
-VS-	¶	BALDWIN COUNTY, ALABAMA,
JOE EDWARD YOUNG,	¶	IN EQUITY.
Respondent.	¶	

ANSWER AND WAIVER

Comes the Respondent, JOE EDWARD YOUNG, in the above styled cause and for answer to the bill of complaint heretofore filed in said cause, and to each and every paragraph thereof, says:

He denies each and every allegation contained therein and demands strict proof thereof.

Respondent hereby submits himself to the jurisdiction of this Honorable Court and waives notice of the time and place for taking testimony in said cause, waives the issuance of a formal commissioner to take testimony in said cause and consents that testimony may be taken without further notice to him and further waives notice of the time and place of submission of said cause and consents that said cause may be submitted for final decree at any time or place without further notice to him of such submission.

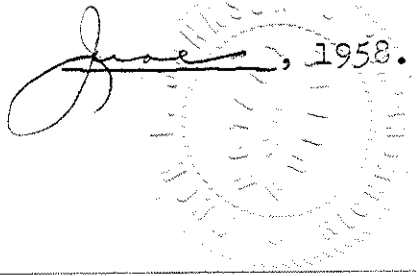
Joe Edward Young
JOE EDWARD YOUNG

(alias) *Eston Reynolds*

STATE OF VIRGINIA,
City of Richmond
COUNTY OF Richmond.

I, *Hugh L. Johnson*, a Notary Public in and for said State and County, hereby certify that JOE EDWARD YOUNG, (ALIAS) *Eston Reynolds*, whose name is signed to the foregoing instrument and who is known to me to be the respondent above named, acknowledged before me on this day that he executed the same voluntarily with knowledge of its contents.

Witness my hand and official seal this the 14 day of June, 1958.



Hugh L. Johnson
Notary Public
my Comm. Expires 8-16-60

ETHEL MAE YOUNG,

Complainant

-VS-

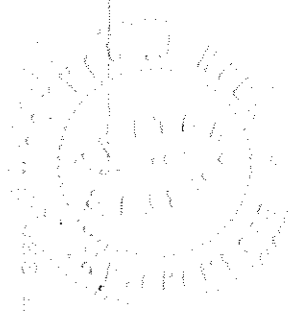
JOE EDWARD YOUNG,

Respondent

ANSWER AND WAIVER

*Filed 1-25-58
Alice French
Algeria*

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



I, TILLIE K. STEPHENS, Commissioner, acting under stipulation of the parties in the divorce suit of ETHEL MAE YOUNG Vs. JOE EDWARD YOUNG, pending in the Equity side of the Circuit Court of Baldwin County, Alabama, hereby certify that I have caused the witnesses in this cause, namely ETHEL MAE YOUNG, DELLA HARRIS and IRENE STANTON, who were made known to me and known to be the identical witnesses called by the parties, to come to my office in the Bank Building in the City of Fairhope, Baldwin County, Alabama, where said witnesses, after being first duly sworn by me, upon examination of E. G. Rickarby, Esquire, Solicitor for the Complainant, did testify as shown by the attached testimony, and that their testimony was, by me, reduced to writing as given by them as near as might be in their identical language and, after being so reduced to writing, was read over by the said witnesses who assented to and signed the same in my presence.

I further certify that I am not of counsel or kin to either of the parties to the cause, nor anywise interested in the results thereof.

IN WITNESS, I hereunto set my hand as Commissioner on this the 25th day of June, 1958.


COMMISSIONER

Cont'd:
Testimony, Ethel Mae Young

Subscribed and sworn to before me this the 25th
day of June, 1958.

Lillis K. Stephens
COMMISSIONER

ETHEL MAE YOUNG,

Complainant,

-VS-

JOE EDWARD YOUNG,

Respondent.

TESTIMONY

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

ETHEL MAE YOUNG,

¶

Complainant, ¶

IN THE CIRCUIT COURT OF

-VS-

¶

BALDWIN COUNTY, ALABAMA,

JOE EDWARD YOUNG,

¶

IN EQUITY.

Respondent. ¶

¶

TESTIMONY OF IRENE STANTON, A WITNESS ON BEHALF OF COMPLAINANT:

IRENE STANTON, being duly sworn, testified as follows:

My name is IRENE STANTON, and I am the aunt of
ETHEL MAE YOUNG. I know that she is a resident of Baldwin
County, Alabama, and that she is over the age of twenty-one,
and that her husband is not here, and that he is over the age
of twenty-one years, and that she is taking care of the children
and that she is the proper person to take care of the children.

Irene Stanton
IRENE STANTON

subscribed and sworn to before me on this the 25th day of June,
1958.

Lillian K. Stephens
COMMISSIONER

ETHEL MAE YOUNG, ¶
 Complainant, ¶
 - VS - ¶
JOE EDWARD YOUNG, ¶
 Respondent. ¶

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

TESTIMONY OF DELLA HARRIS, A WITNESS ON BEHALF OF COMPLAINANT:

DELLA HARRIS, being duly sworn, testified as follows:

My name is DELLA HARRIS and I live in Daphne, Baldwin County, Alabama. I have known ETHEL MAE YOUNG all of my life as she is my sister, and know that she is over the age of twenty-one years, and has been a resident of Baldwin County, Alabama, for the last eight years and she is still a resident of Daphne, Baldwin County, Alabama.

I know that she married JOE EDWARD YOUNG back in 1943. I know this because I married in 1944 and she was married before I was, and I know that they have been separated since somewhere around four months and a half before James Junior, their son, was born, and he has done nothing for her during this time and has not even seen his baby, and has made no effort to support her.

I have heard that he is in the penitentiary but do not know that. ETHEL MAE is taking care of the children and the children are well taken care of by ETHEL MAE who is filing suit for this divorce.


DELLA HARRIS

Subscribed and sworn to before me this 25th day of June, 1958.


COMMISSIONER

FILED

JUN 30 1958

ALICE I. BECK, Register

E. G. RICKARBY

BANK BUILDING
FAIRHOPE, ALABAMA

June 27, 1958

Mrs. Alice Duck
Clerk of the Circuit Court
Bay Minette, Alabama

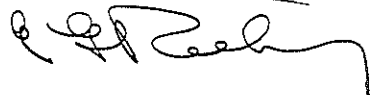
Dear Mrs. Duck:

Inre: Young vs. Young
Our File: 4464

With this we are handing you Divorce Decree,
Answer and Waiver, Note of Evidence and testi-
monies of Complainant and her two witnesses,
the bill of complaint and costs, having already
been sent you.

Please process, and oblige.

Yours very truly,



ts
encl.

E. G. RICKARBY

BANK BUILDING
FAIRHOPE, ALABAMA

June 11, 1958

Mrs. Alice Duck
Clerk of Circuit Court
Bay Minette, Alabama

Inre: Young Vs. Young
Our File: 4464

Dear Mrs. Duck:

With this we are sending you a divorce case
Young versus Young, together with deposit
for costs in the sum of \$15.00.

I have sent off for a waiver in this case. The
Defendant is in the penitentiary, and he may
sign it or he may not. He is trying to go
before the pardon board saying that he has a wife
and three children to support so he may not sign
it. In ten days I will let you know whether to
run the publication.

Yours very truly,

E. G. Rickarby

EGR/sl
Enclosure
6/21/58

*Please try to get
service by registered mail
if not a I don't get waiver
I will advertise,*

EGR

BETHEL MAE YOUNG,
Complainant,

-VS-

JOE EDWARD YOUNG,
Respondent.

I IN THE CIRCUIT COURT OF
I BALDWIN COUNTY, ALABAMA,
I
I IN EQUITY
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BILL OF COMPLAINT

TO THE HONORABLE E. H. HALL, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY.

Comes the complainant, BETHEL MAE YOUNG, and brings this bill against JOE EDWARD YOUNG, respondent, and respectively shows:

FIRST: Complainant is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama, living in Daphne, Alabama, and has been such for three years next preceding the filing of this her Bill of Complaint.

SECOND: The Respondent, JOE EDWARD YOUNG, is over the age of twenty-one years and is now residing as a convict in the Virginia State Penitentiary, 500 Spring Street, Richmond, Virginia and this is his mailing address.

THIRD: That the Complainant and Defendant were lawfully married on the 6th day of March, 1943, at Mobile, Alabama, and lived together as husband and wife until the 16th of December, 1947, at Monroeville, Alabama, at which time the Defendant voluntarily abandoned the bed and board of his wife and said abandonment has been continuous since that time, and the Complainant has received no support from the Respondent since that time, which time is more than one year next preceding this her filing of her Bill of Complaint.

FOURTH: To this marriage there has been born three children, namely, Elizabeth Young, a Daughter, age fourteen years; Charles Edward Young, a Son, age twelve years; and James Junior Young, a Son, age ten years and said children are now residing with this Complainant who is supporting said children and it is to the best interest of said children to be under the care, custody, and control of their mother, this complainant.

PREMISES CONSIDERED, Complainant prays that the court will make the said JOE EDWARD YOUNG, a party respondent to this Bill of Complaint by appropriate process requiring him to please answer or demur within the time prescribed by law.

The Complainant further prays the court, ^{on a hearing on this cause,} will award her the custody of said minor children and will render a decree forever divorcing her from the bonds of matrimony from said defendant and for such other different and further relief as to equity may seem proper.


E. C. Rickaby,
Attorney for Complainant

ETHEL MAE YOUNG
Complainant

-Vs-

JOE EDWARD YOUNG,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

AFFIDAVIT FOR PUBLICATION

State of Alabama
Baldwin County

Before me, Tillie K. Stephens, a notary public, personally appeared ETHEL MAE YOUNG, who being duly sworn deposes and says:

JOE EDWARD YOUNG, the respondent, in this cause is a non resident of the State of Alabama and that his last known address is, "Virginia State Penitentiary, 500 Spring Street, Richmond, Virginia," and that a better address cannot be ascertained after reasonable effort.

Affiant further states that she believes JOE EDWARD YOUNG is over the age of twenty-one years.

Ethel Mae Young
Affiant

Subscribed and sworn to
before me this the 11th
day of June, 1958.

Tillie K. Stephens
Notary Public

720.4307

after copy



FILED

JUN 10 1958

ALICE J. BUCK, Register

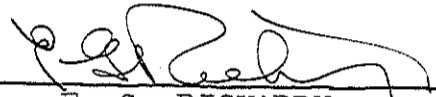
ETHEL MAE YOUNG,
Complainant,
-VS-
JOE EDWARD YOUNG,
Respondent.

Y
Y
Y
Y

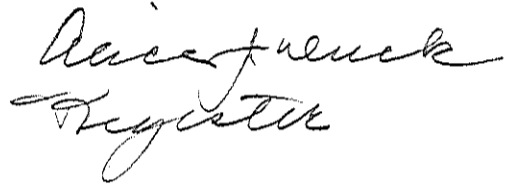
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

NOTE OF EVIDENCE

This cause is submitted for final decree on Complainant's bill, answer and waiver filed by Respondent, and depositions of Complainant and Della Harris and Irene Stanton.



E. G. RICKABY,
Solicitor for Complainant.



Alice French
Register

ETHEL MAE YOUNG,

Complainant,

-VS-

JOE EDWARD YOUNG,

Respondent.

NOTE OF EVIDENCE

FILED
JUN 30 1938
ALICE J. DUCK, Register

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

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 Comanded to Summon Joe Edward Young

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

..... Joe Edward Young, Defendant

by Ethel Mae Young


....., Plaintiff

Witness my hand this 16th day of June 1958

Beice J. Smith, Clerk

PREMISES CONSIDERED, Complainant prays that the court will make the said JOE EDWARD YOUNG, a party respondent to this Bill of Complaint by appropriate process requiring him to please answer or demur within the time prescribed by law.

The Complainant further prays the court, on a hearing on this cause, will award her the custody of said minor children and will render a decree forever divorcing her from the bonds of matrimony from said defendant and for such other different and further relief as to equity may seem proper.



E. G. Rickarby,
Attorney for Complainant

70.4307

ETHEL MAE YOUNG,
Complainant

-VS-

JOE EDWARD YOUNG,
Respondent.

BILL OF COMPLAINT

FILED

JUN 16 1958

ALICE J. BUCK, Register

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

ALICE J. DUCK, Circuit Clerk

Baldwin County

BAY MINETTE, ALA.

CERTIFIED MAIL
No. 134282

Certified

For Delivery Only To Person
To Whom Addressed

Return Receipt Requested

4307



REASON
Unclaimed
Unknown
For better address
Moved, left no address

CHECKED
RELEASED

not found
5815

Joe Edward Young,
c/o State Penitentiary,
500 Spring Street,
Richmond, Virginia

NOT IN DIRECTORY



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:

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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

Joe Edward Young, Defendant

by Ethel Mae Young

....., Plaintiff

Witness my hand this 16th day of June 1938

Carrie J. [Signature], Clerk

ETHEL MAE YOUNG,
Complainant,

-VS-

JOE EDWARD YOUNG,
Respondent.

I
I
I
I
I

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

BILL OF COMPLAINT

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

Comes the complainant, ETHEL MAE YOUNG, and brings this bill against JOE EDWARD YOUNG, respondent, and respectively shows:

FIRST: Complainant is over the age of twenty-one years and is a bona fide resident of Baldwin County, Alabama, living in Daphne, Alabama, and has been such for three years next preceding the filing of this her Bill of Complaint.


SECOND: The Respondent, JOE EDWARD YOUNG, is over the age of twenty-one years and is now residing as a convict in the Virginia State Penitentiary, 500 Spring Street, Richmond, Virginia and this is his mailing address.

THIRD: That the Complainant and Defendant were lawfully married on the 6th day of March, 1943, at Mobile, Alabama, and lived together as husband and wife until the 16th of December, 1947, at Monroeville, Alabama, at which time the Defendant voluntarily abandoned the bed and board of his wife and said abandonment has been continuous since that time, and the Complainant has received no support from the Respondent since that time, which time is more than one year next preceding this her filing of her Bill of Complaint.

FOURTH: To this marriage there has been born three children, namely, Elizabeth Young, a Daughter, age fourteen years; Charles Edward Young, a Son, age twelve years; and James Junior Young, a Son, age ten years and said children are now residing with this Complainant who is supporting said children and it is to the best interest of said children to be under the care, custody, and control of their mother, this complainant.

PREMISES CONSIDERED, Complainant prays that the court will make the said JOE EDWARD YOUNG, a party respondent to this Bill of Complaint by appropriate process requiring him to please answer or demur within the time prescribed by law.

The Complainant further prays the court, on a hearing on this cause, will award her the custody of said minor children and will render a decree forever divorcing her from the bonds of matrimony from said defendant and for such other different and further relief as to equity may seem proper.


E. G. Rickarby,
Attorney for Complainant

no. 43 67

ETHEL MAE YOUNG
Complainant

- VS -

JOE EDWARD YOUNG,
Respondent.

BILL OF COMPLAINT

FILED

JUN 16 1958

ALICE J. DOCK, Register

IN THE CIRCUIT COURT
OF BALDWIN COUNTY, ALABAMA
IN EQUITY