

3480

DIVORCE DECREE

PRINTED BY MOORE PPG. CO.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Annie Pearl Yarbrough, Complainant

vs.

Jessie James Yarbrough, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso, on X answer & waiver of defendant 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

Annie Pearl Yarbrough is forever divorced from the said Jessie James Yarbrough for and on account of

CRUELTY

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that the complainant may resume her maiden name of Annie Pearl Crutchfield.

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 Annie Pearl Yarbrough the complainant pay the cost herein to be taxed, for which executed may issue.

This 5 day of March, 1955

Hubert Moore 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. 3480 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

**DIVORCE DECREE**

**FILED**  
MAR 5 1955  
ALICE J. DICK, Register

The State of Alabama,  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

Annie Pearl Yarbrough

Complainant

VS.

Jessie James Yarbrough

Respondent

I, Madeline S. Brvars

as Register and Commissioner

have called and caused to come before me Annie Pearl Yarbrough

witness 2 named in the Requirement for Oral Examination, on the 5th day of March

19 55, at the office of Beebe & Swearingan

in Bay Minette, Alabama, and having first sworn said Witness 2 to speak the

truth, the whole truth, and nothing but the truth, the said Annie Pearl Yarbrough

doth depose and say as follows:

My name is Annie Pearl Yarbrough. I am 19 years of age. I am the wife of Jessie James Yarbrough. He is 31 years old. We are both residents of Bay Minette, Alabama, were we have lived continuously since our marriage in November, 1950. We separated in Bay Minette, Baldwin County, Alabama, August 9, 1954. Jessie is a man of violent and ungovernable temper and has frequently threatened to kill me and ~~but for the intervention of others would have done me~~ bodily harm attendant with danger to my life or health. On the evening of August 9th, 1954, he cursed me and threatened me and drove me away from home. And later came to my mother's house and cursed me and threatened my life and tried to force me to come out of the house. He said that if I came out of the house he would kill me and tried to get my mother to put me out of her house so he could kill me. I left him and because of his threats I am afraid to return to him.

Annie Pearl Yarbrough

ORAL EXAMINATION

I, Madeline S. Bryans, 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 and read over to her and she signed the same in the presence of myself

W. C. Beebe

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 5th day of March, 1955.

Madeline S. Bryans (L. S.)

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

The State of Alabama  
Baldwin County.

In Circuit Court, In Equity

Carrie Paul Gubnow  
vs.  
Francis James Gubnow  
Complainant

Respondent

**Oral Deposition**

Filed \_\_\_\_\_, 19\_\_

Register

Recorded in  
**FILED**  
MAY 5 1955  
Record

Vol. \_\_\_\_\_  
Register

ALICE J. BRACK, Register

THE STATE OF ALABAMA,  
Baldwin County.

CIRCUIT COURT

TO: Madeline S. Boyers

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 Annie Pearl Yarbrough

as witnesses in behalf of Annie Pearl Yarbrough in a cause pending in our  
Circuit Court in Baldwin County, of said State, wherein

Annie Pearl Yarbrough, Complainant  
and

Jessie James Yarbrough Respondent

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

Witness 5th day of March, 1955.

Archie - [Signature]  
Register.

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

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

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

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

**CIRCUIT COURT**

Annie Pearl Yarbrough

Complainant—

**vs.**

Jessie James Yarbrough

Defendant—

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER**

**WITNESSES:**

REQUEST FOR DECREE IN VACATION

Printed by The Baldwin Times

State of Alabama,  
Baldwin County.

} NO. \_\_\_\_\_

\_\_\_\_\_ TERM, 194\_\_\_\_\_

\_\_\_\_\_  
Complainant—.

VS.

\_\_\_\_\_  
Respondent—.

TO R. S. DUCK, REGISTER:

In the above stated cause a ~~answer and waiver~~ \_\_\_\_\_

having been filed by \_\_\_\_\_ the Respondent—,  
and evidence having been taken, and the cause being ready for submission for final decree, and  
no defense having been interposed, the complainant—, by Beebe & Swearingen \_\_\_\_\_,  
Solicitor— of record, now files with the Register of this Court this written request to deliver the  
papers in this cause to the Judge for final decree in vacation.

Beebe & Swearingen  
W. P. Beebe  
Solicitor— for Complainant—.

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

\_\_\_\_\_  
Annie Pearl Yarbrough  
Complainant—

VS.

\_\_\_\_\_  
Jessie James Yarbrough  
\_\_\_\_\_  
Respondent—

**Request For Decree In Vacation**

Filed \_\_\_\_\_, 194—

Register.

**FILED**

**MAR 5 1955**

**ALICE J. DWCK, Register**



Annie Pearl Yarbrough  
Complainant  
vs.  
Jessie James Yarbrough  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

No. ....

### DEMAND FOR ORAL EXAMINATION

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from  
Ray Minetta, in the County of Baldwin  
Alabama, the place of trial of said cause, to-wit: Annie Pearl Yarbrough

2. That said Complainant requires an oral examination of said witnesses before a Commissioner appointed by the Register of this Court.

Beebe & Swearingen

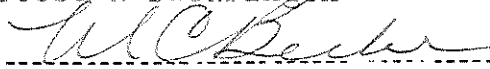


Solicitor for Complainant

NOTE:

Complainant suggests the name of Madeline S. Bryars  
as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Beebe & Swearingen



Solicitor for Complainant.

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DEMAND FOR ORAL EXAMINATION

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Annie Pearl Yarbrough  
Complainant

vs.

Jessie James Yarbrough  
Respondent

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

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Filed this \_\_\_\_\_ day of \_\_\_\_\_

194\_\_\_\_\_

**FILED**  
MAR 5 1955  
ALICE J. BECK, Register

Moore Printing Co. \_\_\_\_\_ Register

Annie Pearl Yarbrough

vs.

Jessie James Yarbrough

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 as noted by the register

and in behalf of Defendant upon answer and waiver

Baker & Swearingen  
by: W. C. Baker

David J. ...  
Register.

No. ....

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

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

Annie Pearl Yarbrough

vs.

Jessie James Yarbrough

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of ....., 194

**FILED**  
**MAR 5 1955**

Register.

Printed by the Baldwin Times, Register

ANNIE PEARL YARBROUGH		IN THE CIRCUIT COURT OF
COMPLAINANT		
VS		BALDWIN COUNTY, ALABAMA
JESSIE JAMES YARBROUGH		
RESPONDENT		IN EQUITY

And now comes the Defendant in his own proper person and accepts service of the summons and complaint in the above styled cause, and denies each and every allegation contained in the bill of complaint, and demands strict proof of the same.

The defendant waives notice of the time of taking testimony on behalf of complainant, the right to cross examine complainant's witnesses, and agrees that this cause be submitted forthwith for final decree without notice.

Jessie James Yarbrough

WITNESS:

STATE OF ALABAMA  
BALDWIN COUNTY

I, Madeline S. Buzard, a Notary Public in and for said state and county, hereby certify that Jessie James Yarbrough, 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 this the 5 day of March 1955.

Madeline S. Buzard  
Notary Public, Baldwin County, Ala.

FILED

Mar. 5, 1955

W. L. DUCK, Register

STATE OF ALABAMA

BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA, GREETINGS:

WE COMMAND YOU, that you summon Jessie James Yarbrough to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty days after the service of the summons, and there to answer, plead, or demur without oath to a bill of complaint, lately exhibited by Annie Pearl Yarbrough against the said Jessie James Yarbrough, and further to do and perform what the said Judge shall order and direct in that behalf, and this the defendant shall in no wise omit, under penalty of the law. And we further command that you return this writ with your execution thereon, to our said court immediately upon the execution thereof.

WITNESS, Alice J. Duck, Register, of said Circuit Court, this the \_\_\_ day of \_\_\_\_\_, 1954.

\_\_\_\_\_  
Register.

ANNIE PEARL YARBROUGH		IN THE CIRCUIT COURT OF
COMPLAINANT		
VS		BALDWIN COUNTY, ALABAMA,
JESSIE JAMES YARBROUGH		
RESPONDENT		IN EQUITY

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

Now comes your complainant, Annie Pearl Yarbrough, and humbly complaining against the defendant, Jessie James Yarbrough, respectfully represents and shows unto your Honor and this Honorable Court as follows:

First: That your complainant is over the age of 19 years, that the defendant, Jessie James Yarbrough, is over the age of 21 years, and are both residents of Bay Minette in Baldwin County, Alabama, where they have resided continuously since their marriage in November, 1950.

Second: That they were married in Bay Minette, Alabama, in November, 1950 and lived together as husband and wife in Bay Minette until August 9th, 1954, when your complainant because of the cruelty of the defendant was compelled to leave the defendant, that there were no children born to complainant and defendant.

THIRD: That the defendant is a man of violent and un-governable temper and without just cause or excuse has frequently become enraged and has cursed and abused complainant and threatened to kill her; that he has become increasingly more violent and cruel to your complainant and on the evening of August 9th, 1954, he cursed her and abused her and drove her away from home; and she fears that should she return to him he would inflict bodily injury upon her attendant with danger to her life or health.

WHEREFORE your complainant prays that this Honorable Court will take jurisdiction of the cause and by appropriate process make the said Jessie James Yarbrough party defendant hereto and require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter a decree forever dissolving the bonds of matrimony existing between this complainant and the said defendant; and complainant prays for such other, further or different relief as in equity and good conscience she shall be entitled to receive in the premises.

BEEBE & SWEARINGEN

BY

*M. C. Beebe*  
Solicitors for complainant

FILED

3-5-55

ALICE J. DUCK, Register