


ELIZABETH ANN DICKINSON,)	
Complainant,)	IN THE CIRCUIT COURT OF
vs.)	BALDWIN COUNTY, ALABAMA
JAMES O. DICKINSON,)	IN EQUITY.
Respondent.)	

ANSWER AND WAIVER

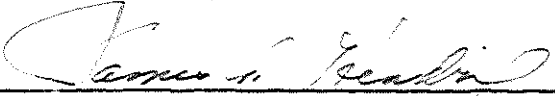
Comes now the Respondent, JAMES O. DICKINSON, and for answer to the Bill of Complaint heretofore filed against him in said cause says as follows:

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

And for further answer to 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.


 James O. Dickinson

Sworn to and subscribed before me this the 29 day of November, 1958,


 Notary Public, Baldwin County, Alabama.

44555
RECORDED

Mrs. Warner

FILED

DEC 31 1958

ALICE J. DUCK, CLERK
REGISTER

ELIZABETH ANN DICKINSON

vs.

JAMES O. DICKINSON

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, _____
 answer and waiver, and the testimonies of Elizabeth Ann Dickinson and
 William Jackson Ard.

and in behalf of Defendant upon _____

James O. Dickinson

Berie J. Smith
 Register.

No. 4455

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

ELIZABETH ANN DICKINSON

vs.

JAMES C. DICKINSON

NOTE OF TESTIMONY

Filed in Open Court this

day of DEC 31 1958, 194

WILLIAM DICKINSON, CLERK
REGISTER

Register.

Printed by the Baldwin Times

COMMISSION TO TAKE DEPOSITIONS

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 Elizabeth Ann Dickinson and William Jackson Ard,

a witness in behalf of Elizabeth Ann Dickinson in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Elizabeth Ann Dickinson is

, Complainant

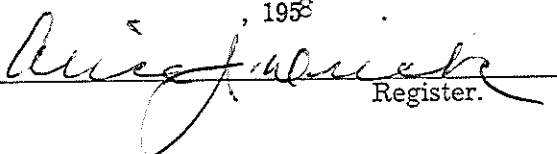
and James O. Dickinson is

Respondent

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

Witness 29 day of November

, 1958


Register.

Commissioner's Fee, \$

Witness' Fees, \$

44#5
No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

ELIZABETH ANN DICKINSON,

VS. Complainant

JAMES O. DICKINSON,

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

FILED
DEC 31 1958
ALICE J. DUCK, CLERK
REGISTER

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ELIZABETH ANN DICKINSON

, Complainant

vs.

JAMES O. DICKINSON

, 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 Elizabeth Ann Dickinson is forever divorced from the said James O. Dickinson for and on account of

Voluntary Abandonment - It is further ordered, adjudged and decreed that the Complainant by and she is hereby awarded the permanent care, custody and control of the minor children born to the union of said parties, namely, Karen Dell Dickinson and Michael J. Dickinson.

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 James O. Dickinson the Respondent pay the cost herein to be taxed, for which executed may issue.

This 8 day of December 1958
Robert 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. 21445 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)

ELIZABETH ANN DICKINSON

COMPLAINANT

vs.

JAMES O. DICKINSON

RESPONDENT

I, GRADY P. GILBERT, JR.

as Register and Commissioner

have called and caused to come before me Elizabeth Ann Dickinson and William

Jackson Ard

witnesses named in the requirement for Oral Examination, on the 29th day of November

1945, at the office of James A. Hendrix

in Robertsdale, Alabama, and having first sworn said witnesses to speak the

truth, the whole truth, and nothing but the truth, the said Elizabeth Ann Dickinson

and William Jackson Ard doth depose and say as follows:

My name is Elizabeth Ann Dickinson. I am over the age of twenty-one years and a resident of Baldwin County, Alabama, and have been for more than the past year. James O. Dickinson is over the age of twenty-one years and a resident of Baldwin County, Alabama. James and I were married on May 20, 1955, at Seattle, Washington. On July 1, 1957, James left me of his own free will and accord, without any fault on my part; and since that time we have not lived together nor in any way recognized each other as husband and wife. We had two children, namely, Karen Dell Dickinson, a girl, now two and one-half years old, and Michael J. Dickinson, a boy, now sixteen months old, who are in my care, custody and control, and I feel that I am a fit and proper person to be awarded the permanent care, custody and control of these minor children. That James O. Dickinson is an able bodied man, well able to provide for and maintain said minor children.

Elizabeth Ann Dickinson

I have known Elizabeth Ann Dickinson for more than the past three years. She is over twenty-one years old and a resident of Baldwin County, Alabama, and has been for more than the past year. James O. Dickinson is over twenty-one years old and is a resident of Baldwin County, Alabama. James O. and Elizabeth Ann were married on May 20, 1955, at Seattle, Washington. On July 1, 1957, James left her of his own free will and accord, without fault on her part; and since that time they have not lived together nor in any way recognized each other as husband and wife. They had two children, namely Karen Dell Dickinson, a girl, now two and one-half years old, and Michael J. Dickinson, a boy, now sixteen months old, who are in the care, custody and control of Elizabeth Ann. I feel that she is a fit and proper person to be awarded the care, custody and control of these minor children. James O. Dickinson is an able bodied man, well able to provide for and maintain said minor children.

William Jackson Ard

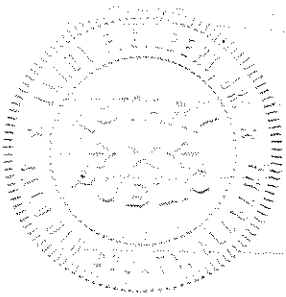
I, Grady P. Gilbert Jr.
DELTA S. CHALMERS

as Commissioner, hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witnesses and read over to them and they signed the same in the presence of myself and James A. Hendrix, at the time and place herein mentioned; that I have personal knowledge of personal identify of said witnesses or had proof made before me of the identity of said witnesses; 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 envelopment to the Register of said Court.

Given under my hand and seal, this 20th day of November, 1958.

Grady P. Gilbert Jr. (L. S.)



FILED
Dec 3 1958
CLERK
REGISTER

14485

STATE OF ALABAMA)

BALDWIN COUNTY)

ELIZABETH ANN DICKINSON,)	
Complainant,)	IN THE CIRCUIT COURT OF
vs.)	BALDWIN COUNTY, ALABAMA
JAMES O. DICKINSON,)	IN EQUITY.
Respondent,)	

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

Sitting in Equity:

Comes now the Complainant, ELIZABETH ANN DICKINSON, humbly complaining of the Respondent, JAMES O. DICKINSON, in a matter of divorce, and represents and shows unto your Honor as follows:

FIRST: That Complainant, ELIZABETH ANN DICKINSON, 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 one year next preceding the filing of this Bill of Complaint; that Respondent is over twenty-one years and is a resident of Baldwin County, Alabama.

SECOND: That Complainant and Respondent were married on May 20, 1955, at Seattle, Washington.

THIRD: Complainant further avers that said Respondent voluntarily abandoned the bed and board of Complainant for more than one year next preceding the filing of this bill of complaint, on July 1, 1957, since which time Complainant and Respondent have not lived together nor in any way recognized each other as husband and wife.

FOURTH: Your Complainant would further aver and show unto Your Honor that there were two children born to the union of the Complainant and Respondent, namely, Karen Dell Dickinson, now about two and one-half years old, and Michael J. Dickinson, a boy, now about sixteen months old, who are in the care, custody and control of the Complainant, their mother, and that Complainant is a fit and proper person to be awarded the permanent care, custody and control of the said minor children.

FIFTH: That your Complainant would further aver and show that the Respondent is an able bodied man, well able to help provide for and maintain the said minor children.

PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said James O. Dickinson, 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 said decree the Complainant will be granted the right to again contract marriage; that by virtue of said decree, the Complainant will be awarded the permanent care, custody and control of the said minor children, Karen Dell Dickinson and Michael J. Dickinson, and that your Honor will decree an amount to be paid each month by the Respondent to the Complainant for the support and maintenance of said minor children.

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

James S. Kendrick
Attorney for Complainant.