

(3698)

**DIVORCE DECREE**

Printed by Moore Ptg. Co.

**The State of Alabama, Baldwin County**

**CIRCUIT COURT, IN EQUITY**

**JESSE J. LANGLEY** \_\_\_\_\_, Complainant

vs.

**EFFIE MAE LANGLEY** \_\_\_\_\_, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on **Personal Service** \_\_\_\_\_ 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 **JESSE J. LANGLEY** \_\_\_\_\_ is forever divorced from the said **EFFIE MAE LANGLEY** \_\_\_\_\_ for and on account of **Abandonment**

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 \_\_\_\_\_ **JESSE J. LANGLEY** \_\_\_\_\_ the **Complainant** \_\_\_\_\_ pay the cost herein to be taxed, for which executed may issue.

This 7<sup>th</sup> day of March 1956

*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.

RECORDED

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

**DIVORCE DECREE**

FILED  
MAR. 7 1956  
CLAUDE L. DUBOIS, CLERK

CIRCUIT COURT COMPLAINT

Printed by the Baldwin Times, Bay Minette, Alabama.

Jesse J Langley  
Complainant,  
Vs.  
Effie Mae Langley  
Respondent.

In the Circuit Court.  
In Equity No. \_\_\_\_\_.

DECREE PRO CONFESSO ON PERSONAL SERVICE.

In this cause, it appears to the Register, that service was had on the Respondent  
Effie Mae

by the Sheriff of Mobile County, on the 25th day of January  
1956

And it further appears to the Register, that that the said  
Effie Mae Langley

the Respondent, having to the date hereof,  
failed to plead, demur to or answer the Bill of Complaint filed in this cause, it is now, therefore,  
on motion of Allen Cook Solicitors  
for Complainant, ordered, and decreed by the Register that the Bill of Complaint in this cause be,  
and it hereby is, in all things taken as confessed against the said Effie Mae Langley

This 28th day of February, 1956

*Wesley Clark*  
Register.

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

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

Complainant,

Vs.

Respondent.

**DECREE PRO CONFESSO ON  
PERSONAL SERVICE.**

Issued this \_\_\_\_\_ day of \_\_\_\_\_

194\_\_\_\_\_.

Register.

RECORDED

Motion for Decree Pro Confesso

Jesse J. Langley., Complainant  
 vs.  
Effie Mae Langley, Respondent

No. \_\_\_\_\_  
 \_\_\_\_\_ Circuit Court  
 In Equity

Comes the Complainant, by his Solicitor, and moves the Register for a Decree pro confesso against \_\_\_\_\_  
Effie Mae Langley a Defendant in his cause on the ground that more than thirty days have  
 elapsed since service by personal process.

was perfected against said Defendant, and that she has to the date hereof failed to plead, answer  
 or demur to the bill of complaint in said cause.

Allen Cook  
 Solicitor for Complainant.

Dated this 28 day of February, 19 56.

**RECORDED**

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

vs.

**MOTION FOR  
DECREE PRO CONFESSO**

Filed in Office this 28

day of Feb, 1956

Alice J. [Signature]  
Register.

JESSE J. LANGLEY	‘	IN THE CIRCUIT COURT
COMPLAINANT	‘	OF BALDWIN COUNTY ALABAMA
VS	‘	IN EQUITY.
EFFIE MAE LANGLEY	‘	
RESPONDENT	‘	

TO HONORABLE HUBERT HALL, JUDGE OF SAID COURT:


Complainant above named would most respectfully represent unto the court the following:

1. That he is over the age of 21 years and is a resident citizen of Covington County Alabama. Respondent is likewise over the age of 21 years and is a resident citizen of Mobile County Alabama, her address being Rt. 3, Box 448, Mobile, Ala.

2. The parties hereto intermarried to-wit August 5, 1924 and lived together as husband and wife until to-wit December 1954, at which time they separated without fault on complainant's part. The parties both resided in Baldwin County Alabama at the time of said separation and complainant has resided in the State of Alabama bona fide for more than one year continuously next preceding the filing of this bill of divorce.

3. In December 1954 respondent voluntarily abandoned the bed and board of complainant and has not returned at any time since then to live with him as his wife.

P R A Y E R :: The premises considered, complainant prays that process issue to Effie Mae Langley, making her a party respondent to this bill and commanding her to interpose defense within the time allowed by law, or failing to do so that a decree pro confesso be entered against her. He prays that upon a final hearing that the court will by decree dissolve the bonds of matrimony now existing between the parties. He prays for any other, further, or additional relief as he may be entitled to upon a consideration of the premises

  
 ATTORNEY FOR COMPLAINANT

SUMMONS AND COMPLAINT

Moore Printing Co.

THE STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No 3698

Jan. TERM, 19 56

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon EFFIE MAE LANGLEY

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

EFFIE MAE LANGLEY, Defendant

by JESSE J. LANGLEY, Plaintiff

Witness my hand this 16 day of Jan. 19 56

*Alice J. Smith*, Clerk



1466  
Card sent  
1-22-56  
No. 3698

Page

397  
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THE STATE OF ALABAMA  
BALDWIN COUNTY

CIRCUIT COURT

JESSE J. LANGLEY

Plaintiffs

vs.

<sup>25x</sup>  
~~2 DC~~  
EFFIE MAE LANGLEY

Route 3, Box 448

Defendants

SUMMONS and COMPLAINT

Filed JAN. 16, 19 56

Alice J. Duck, Clerk

1-20-56  
ALLEN COOK

Plaintiff's Attorney

Defendant's Attorney

RECORDED

Defendant lives at

RECEIVED IN OFFICE

Jan 18, 19 56

Raymond Bridges, Sheriff

I have executed this summons

this 25 day of January, 19 56  
by leaving a copy with

Effie Mae Langley

The Sheriff claims 30

miles at 10¢ per mile for

a total of \$ 3.00

Ray Bridges, Sheriff

Mobile County, Alabama

Ray D. Bridges, Sheriff

A. S. Chatham, Deputy Sheriff

ALLEN COOK  
ATTORNEY AT LAW  
HENDERSON BLDG.  
ANDALUSIA. ALA.

February 20, 1956

Mrs. Alice Duck  
Circuit Clerk  
Bay Minette, Ala.

*Jessie L.*  
RE: Langley

VS: Langley *Effie Mae*

Dear Mrs. Duck:

Mr. Langley is of the impression that his wife has signed a waiver answer to his bill for divorce. She did not send this answer back to me, but I thought it possible that she might have signed it and sent it to your office. Would you please advise about this?

If such answer has actually been filed then the case is naturally at issue. To speed matters along I would appreciate your appointing Mrs. Lillian Mitchell of Andalusia to act as commissioner to take Mr. Langley's testimony. You can send her these papers % of my office. Ofcourse we will have to wait until the decree pro confesso has been rendered before you can make this appointment unless such answer is on file. Please advise me.

Sincerely,

*Allen Cook*

Allen Cook

AC:LM

The State of Alabama, Baldwin County

IN CIRCUIT COURT, IN EQUITY.

Jesse J. Langley, Complainant

vs.

Effie Mae Langley Defendant

Deposition of

By virtue of the commission hereto annexed, issued by the Register for said Court of said County, in the above stated cause pending in said Court of said County, I, Jonell Brunson

the commissioner named in said commission, have called and caused to come before me

Jesse J. Langley

the witnesses named in said commission, and having first sworn the said witness Jesse J. Langley

to speak the truth, the whole truth, and nothing but the truth, the said witness deposes and says as follows:

The witness testified in narrative form, there being no objection interposed to such form as follows:

I, the complainant, am over 21 years of age and was at the time of filing my bill of complaint, and was then and am now a resident citizen of Covington County Alabama. Respondent was then over 21 years of age and a resident of Mobile County Alabama, Rt. 3, Box 448 in Mobile.

We intermarried August 5, 1924 and lived together as husband and wife until to-wit December 1954, at which time we seperated without fault on my part. We both resided in Baldwin County Alabama at the time of the seperation. I have resided bona fide in Alabama for more than one year continuously next preceeding the filing of my bill of complaint.

In December 1954, respondent voluntarily abandoned our bed and board and has not returned at any time to live with me as my wife. The abandonment took place as a result of a mutual agreement to seperate, such agreement being at the instance and suggestion of the respondent. It came about as a result of respondents unwillingness to have intercourse sexually at any time and permanent renunciation by her of conjugal relations without any cause, and unwillingness to perform the duties of a wife otherwise. Since the seperation she has not at any time offered to return to the former marriage status.

Jesse J. Langley Complainant.

The State of Alabama,

\_\_\_\_\_ COUNTY

IN CIRCUIT COURT, IN EQUITY

*Langley*

vs. Complainant,

*Langley*

Defendant.

**Deposition Taken Before Commissioner on Interrogatories.**

Deposition of \_\_\_\_\_

for \_\_\_\_\_

**FILED**

Filed **MAR 2** day of **1956**, 19\_\_\_\_\_

Published by order of the Court \_\_\_\_\_ day

**ALICE T. BOGA, Register**

of \_\_\_\_\_, 19\_\_\_\_\_

Register.

ALLEN COOK  
ATTORNEY AT LAW  
HENDERSON BLDG.  
ANDALUSIA, ALA.

March 6, 1956.

Mrs. Alice Duck.  
Circuit Clerk.  
Bay Minette, Ala.

RE: Langley vs Langley.

Dear Mrs. Duck:

Enclosed find appointment of commissioner and deposition herein. Would you kindly prepare and submit to the judge final decrees of divorce. I have collected the costs, so if you will advise me the exact amount, my check will be promptly forwarded to you.

The judge will possibly notice that this case presents a rather unusual situation. I believe the case of Ex Parte Cox, 160 Southern 230 is in point as are the cases cited under paragraphs 5 and 6 of the opinion proper.

Thanks very much for your kind attention to this matter. Mr. Langley will be in my office this Saturday, so I hope I can hand him the decree at that time.

Sincerely,

*Allen Cook*  
Allen Cook

ALLEN COOK  
ATTORNEY AT LAW  
HENDERSON BLDG.  
ANDALUSIA, ALA.

February 27, 1956.

Mrs. Alice Duck.  
Circuit Clerk  
Bay Minette, Ala.

RE: Langley vs Langley.

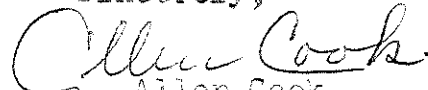
Dear Mrs. Duck:

Since more than 30 days have expired after service of personal process upon Mrs. Langley, would you kindly enter a decree pro confesso pursuant to the enclosed motion, which I would appreciate your dating and filing.

If you have not already prepared an appointment of a commissioner, would you kindly send me one naming Mrs. Jonell Brunson as commissioner, her address being Andalusia, Ala. I previously suggested Mrs. Lillian Mitchell, but this would not be convenient for her, so please appoint Mrs. Brunson instead unless it has been otherwise done in which event it is O.K.

Also advise your costs and they will be taken care of in the same mail in which the commission is sent back.

Sincerely,

  
Allen Cook

Jesse J. Langley

vs.

Effie Mae Langley

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 Complainant

and in behalf of Defendant upon \_\_\_\_\_ Decree Pro Confesso

Allen Cook,  
Solicitor For Complainant

*Alvin J. ...*  
Register.

**RECORDED**

No. ....

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

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

vs.

**NOTE OF TESTIMONY**

Filed in Open Court this .....

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

Register.

Printed by the Baldwin Times



THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO:

MRS. JONELL BRUNSON

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

a witnesses in behalf of \_\_\_\_\_ in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

JESSE J. LANGLEY

Complainant

and

EFFIE MAE LANGLEY

Respondent

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

Witness 28th. day of February, 1956.

*Alice J. ...*  
Register.

Commissioner's Fee, \$ 0

Witness' Fees, \$ 0

No. 3698

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

JESSE J. LANGLEY

Complainant

VS.

EFFIE MAE LANGLEY

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

MRS. JONELL BRUNSON

WITNESSES:

*Jesse J. Langley*

*[Faint, illegible text, likely bleed-through from the reverse side of the page]*

ALLEN COOK  
ATTORNEY AT LAW  
HENDERSON BLDG.  
ANDALUSIA, ALA

January 13, 1956.

Register of Equity Court.

Bay Minette, Alabama.

RE: Langley vs Langley.

Dear Sir:

Enclosed find divorce bill with Mrs. Langley's  
Mobile address set forth in paragraph 1. Kindly acknowledge  
receipt of papers. Thanks very much.

Sincerely,

  
Allen Cook