

3766

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

KITTY S. CASSADY, Complainant

vs.

JACK VENNERS CASSADY, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Defence to Complaint~~ 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 Kitty S. Cassady is forever divorced from the said Jack Venners Cassady for and on account of Abandonment.

IT IS FURTHER ORDERED ADJUDGED AND DECREED that the Complainant, Kitty S. Cassady, shall have the care, custody and control of George Edward Cassady, age about 16 years, and Isaac Tolbert Cassady, age about 21 years.

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 Kitty S. Cassady the Complainant pay the cost herein to be taxed, for which executed may issue.

This 10th day of April, 1956

Hubert M. Stone 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. 3766 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

KITTY S. CASSADY

Complainant

vs.

JACK VENNERS CASSADY

Respondent

DIVORCE DECREE

*Filed
4-10-56
ance of [unclear]*

KITTY S. CASSADY
COMPLAINANT
VS
JACK VENNERS CASSADY
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY.
CASE NO. _____

Now comes the Respondent and accepted service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

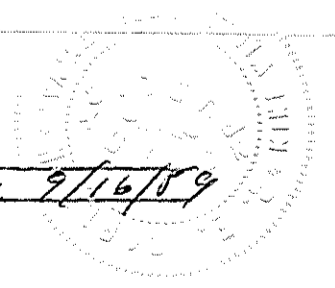
Jack V Cassady

STATE OF Virginia
COUNTY OF King William

I, C. C. Carlton, a Notary Public, in and for said County, in said State, hereby certify that Jack Venners Cassady, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 31 day of March, 1956.

C. C. Carlton
Notary Public, King William 9/16/89



3766

KITTY S. CASSADY

COMPLAINANT

VS

HACK VENNERS CASSADY

RESPONDENT

ANSWER AND WAIVER

FILED
APR 6 1956
ALICE J. DUCK, Clerk



KITTY S. CASSADY

vs.

JACK VENNERS CASSADY

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 Kitty S. Cassady and Sue M. McDowell

and in behalf of Defendant upon Answer and Waiver

[Handwritten signature]

[Handwritten signature]
Register.

No. 3766.....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

KITTY S. CASSADY

vs.

JACK VENNERS CASSADY

NOTE OF TESTIMONY

Filed in Open Court this **FILED**
day of **APR 6**, 1956, 194

ALICE J. BUCK, Clerk

Register.

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama

(In Equity)

KITTY S. CASSADY

Complainant

VS.

JACK VENNERS CASSADY

Respondent

I, Lois Wilson

as Register and Commissioner

have called and caused to come before me Kitty S. Cassady and Sue H. McDowell

witness^{es} named in the Requirement for Oral Examination, on the 5th day of April 1956, at the office of C. LeNoir Thompson in Bay Minette, Alabama, and having first sworn said Witness^{es} to speak the truth, the whole truth, and nothing but the truth, the said Kitty S. Cassady and Sue H. McDowell doth depose and say as follows:

That my name is Kitty S. Cassady, I am over the age of 21 and a resident of Baldwin County, Alabama and have been more than two years next preceeding. The Respondent is over the age of 21 and is a non-resident of the State of Alabama. We were married in Escambia County, Alabama on August 17, 1933 and lived together as husband and wife until on or about the middle of December 1952 at which time the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that date and we have not lived together as husband and wife since that time. There was born as fruits of this marriage three children one of whom is married the other two being, George Edward Cassady age about 16 and Isaac Tolbert Cassady age about 11. Your Complainant respectfully submits that she has had the care, custody and control of these children since birth and that she is a fit, suitable and proper person to have their permanent care, custody and control and respectfully ask the court to grant her the same. There is no property to be divided and your Complainant has not asked for maintenance and support for the children because the Respondent is a non-resident.

Kitty S. Cassady

That my name is Sue H. McDowell,, I know both parties to this cause, they are both over the age of 21 and the Complainant has been a resident of Baldwin County, Alabama more than two years next preceeding. The Respondent is over the age of 21 but so far as I know is a non-resident of the State of Alabama. They were married in Escambia County, Alabama on August 17, 1933 and lived together as husband and wife until on or about the middle of December 1952 at which time the Respondent abandoned the Complainant without fault on her part, and they have not lived together as husband and wife since that date. There was born as fruits of their marriage three children, one of whom is married and the other two being, George Edward Cassady, age about 16 years, and Isaac Tolbert Cassady, age about 11 years. I respectfully submit that Mrs. Kitty S. Cassady, the Complainant is a fit, suitable and proper person to have the care, custody and control of thesetwo children. I do not know of any property which was owned jointly by the parties to this cause. I do not believe these parties will ever live together again as husband and wife.

Sue H. McDowell

ORAL EXAMINATION.

I, Lois Wilson, 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 and C. Le^Noir Thompson

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 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 April, 1956

Lois Wilson (L. S.)

NO. 3764 PAGE

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

KITTY S. CASSADY

vs. Complainant

JACK VENNERS CASSADY

Respondent.

Oral Deposition

Filed **FILED**, 195

APR 6 1956, Register.

APR 1 1956
Recorded in

Record

Vol. _____ Page _____

Register

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: LOIS WILSON

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 Kitty S. Cassady and Sue H. McDowell

a witnesses in behalf of Kitty S. Cassady in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

Kitty S. Cassady

Complainant

and Jack Venners Cassady

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 5 day of April, 1956

Arice J. Lucas
Register.

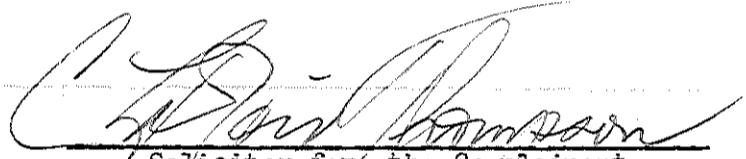
Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

George Edward Cassady, age 16 and Isaac Tolbert Cassady, age 11; and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said JACK VENNERS CASSADY, party Respondent to this bill of complaint requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant further prays that upon a hearing hereof, your Honor will enter an order and decree granting to her an absolute decree of divorce, forever barring the bonds of matrimony existing between her and the Respondent; that a decree be made awarding to the Complainant the custody, care and control of the children, George Edward Cassady, age 16 and Isaac Tolbert Cassady, age 11; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant.

No. 3766

KITTY S. CASSADY

COMPLAINANT

VS

JACK VENNERS CASSADY

RESPONDENT

SUMMONS AND COMPLAINT

FILED

APR 6 1956

ALICE J. DUCK, Clerk