The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

KTTTY S. CASSADY , Complainant
vs.
JACK VENNERS CASSADY , Respondent
This cause coming on to be heard was submitted upon Bill of Complaint, XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
Answer and Waiver and Testimony as noted by the Register, and upon con-
ideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for in
aid bill.
It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofore
xisting between the Complainant and Defendant be, and the same are hereby dissolved, and that the said
Kitty S. Cassadyis forever divorced from the
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Abandonmenta
IT IS FURTHER ORDERED ADJUDGED AND DECREED that the Complainant, Kitty
S. Cassady, shall have the care, custody and control of George Edward Cassady
S. Cassady, shall have the tale, outstay and
age about 16 years, and Isaac Tolbert Cassady, age about Al years.
The state of the s
It is further ordered, adjudged and decreed that neither party to this suit shall again marry excep
to each other until sixty days after the rendition of this decree, and that if appeal is taken within sixt
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 t
again contract marriage upon payment of the cost of this suit.
It is further ordered that Kitty S. Cassady
It is further ordered that
the Complainant pay the cost herein to be taxed, for which executed may issue
This LO day of asul, 1956
This day of Quil 1955 Judge Circuit Court, In Equity
Judge Circuit Court, In Equity
Judge Circuit Court, 12 - 1
I,
Court of Raldwin County, Alabama, do neleby court
foregoing is a correct copy of the original decree rendered by the
Judge of the Circuit Court in the above stated cause, which sale
decree is on file and enrolled in my office. Witness my hand and seal this theday
of, 19
Register of Circuit Court, In Equity.
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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

and who were

KITTY S. CASSADY

COMPLAINANT

VS

JACK VENNERS CASSADY

RESPONDENT

IN THE CIRCUIT JOURT OF PALDWIN COUNTY, ALABAMA IN EQUITY.

CASE NO.

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 fugura

I, a Wotary 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 sare voluntarily on the day the same bears date.

Given under my hand and seal on this the 3/ day of March

Notary Public Fy Con 19 9/16/89

KITTY S. CASSADY

COMPLAINAN T

VS

MACK VENNERS CASSADY

RESPONDENT

ANSWER AND WAIVER

FILED
APR 6 1956
ALICE J. DUCK, Clerk

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THE STATE OF ALABA Baldwin County	IMA	an und
IN EQUITY Circuit Court of Baldwin	Count	Y
KITTY S. CASSADY		
vs. JACK VENNERS CASSADY		: : : : : : : : : : : : : : : : : : :
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day of APR 6 1956 ALICE J. GUCK, Clerk	, 194	i
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THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

KITTY	S.	CASSADY
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_Complainant

VS.

and the comment of the first of the control of the	
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, or 195 6, at the office of C. Le Noir Thompson	n the 5th day of April
in Bay Minette , Alabama, and having first swor	rn said Witnesses to speak the
truth, the whole truth, and nothing but the truth, the saidKitt	y 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 preceding. 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 Baward 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.

Dus H. Mc Bour lo

I, Lois Wilson ,	as Register and Commissioner hereby certify that
the foregoing deposition S on Oral Examination	was taken down by me in writing in the words
	and they signed the same in the presence of
myself and C. Le Coir Thompson	
La Arie Company and Profile Annual Company and Company	
at the time and place herein mentioned; that ${\ensuremath{\text{I}}}$	have personal knowledge of personal identity of
said witness es or had proom made before me	of the identity of said witnesses; 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 enve	elope to the Register of said Court.
Given under my hand and seal, this 5th day	y of <u>April</u> , 1956
	Los 11:10 000 00 00 00

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THE STATE OF ALABAMA Baldwin County

Circuit Court

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	·	Kitt	y S. Cass	sady						
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THE STATE OF ALAI Baldwin County	BAMA
CIRCUIT COU	RT
KITTY S. CASSADY	
Com	plainant
VS.	1
(New York)	
<u> </u>	:
JACK VENNERS CASSADY	
P600-1-101	
es Aguates de com-	
D	efendant
COMMISSION TO TAKE DEP	OSITION
COMMISSIONER:	
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APN 6 1956	
WITNESSES: KITTY S. CASSADY	
SUE H. MCDOWELL	

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STATE OF ALABAMA BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons JACK VENNERS CASSADY, to appear and plead, answer or demur within thirty days from the service hereof to the bill of complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by KITTY S. CASSADY, as Complainant and against JACK VENNERS CASSADY, as Respondent.

WITNESS my hand this the day of April, 1956.					
	Register.				
* * * * * * * * * * * * * *	* * * * * * * * * * * * * * * * * * * *				
KITTY S. CASSADY	O IN THE CIRCUIT COURT OF				
COMPLAINANT	BALDWIN COUNTY, ALAMA				
VS	Į IN EQUITY.				
JACK VENNERS CASSADY	CASE NO.				
RESPONDENT	Ž.				

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

Your Complainant, Kitty S. Cassady, respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is a bona fide resident of Baldwin County, Alabama, and over twenty-one years of age; that the Respondent is over twenty-one years of age and a non-resident of the State of Adabama.

2.

That your Complainant and the Respondent married at Escambia County,
Alabama on August 17, 1933 and lived together as husband and wife in Baldwin
County, Alabama until on or about the middle of December, 1952.

3.

That on or about the middle of December, 1952, while your Complainana and Respondent were living together as husband and wife in Baldwin County, Alabama, the Respondent voluntarily abandoned the bed and board of your Complainant and has remained away voluntarily and continuously since that time.

4.

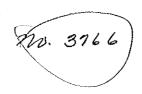
There was born as fruits of this marriage between the Complainant and the Respondent three children, one married, and the other two being

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.



KITTY S. CASSADY

COMPLAINANT

VS

JACK VENNERS CASSADY

RESPONDENT

SUMMONS AND COMPLAINT

FILED APR 6 1956 ALGE 1, DUCK, Clerk