The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Complainant, Complainant
vs.
JAMES L. MCDOWELL . Respondent
Respondent
This cause coming on to be heard was submitted upon Bill of Complaint, Trespect Proceedings of
answer and waiverand Testimony as noted by the Register, and upon con
sideration thereof, the Court is of the opinion that the Complainant is entitled to the relief prayed for it
said bill.
It is therefore ordered, adjudged and decreed by the Court that the bonds of matrimony heretofor
existing between the Complainant and Defendant be, and the same are hereby dissolved, and that the sai
Emma Lou McDowellis forever divorced from the
said
Cruelty - It is further ordered, adjudged and decreed that the Complaina
be and she is hereby awarded the permanent care, custody and control of
the minor children born to the union of said parties, namely: James F.
McDowell, a boy, aged five, and Barbara WcDowell, a girl, aged four:
with the Respondent being hereby awarded rights of visitation at reson-
able times.
It is further ordered adjudged and degreed that neither neutral to this critical and an arrangement
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
the Respondent
This 30 day of April 1957
This 90 day of agree 1957
I febert M I fall
Judge Circuit Court, In Equity
I,, Register of the Circui
Court of Baldwin County, Alabama, do hereby certify that th
foregoing is a correct copy of the original decree, rendered by th
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 theday
of
V4, 17
Register of Circuit Court, In Equity.
A -

THE STATE OF ALABAMA BALDWIN COUNTY In Circuit Court, In Equity Complainant vs. Respondent DIVORCE DECREE

EMMA LOU MCDOWELL, Complainant, vs. JAMES L. MCDOWELL, Respondent. IN THE CIRCUIT COURT OF BALLEWIN COUNTY, ALABAMA IN EQUITY.	STATE OF ALABAMA)			BOOK UZZ PAGE
Complainant, IN THE CIRCUIT COURT OF vs. JAMES L. MCDOWELL, IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY.	•			
Complainant, VS. PALEWIN COUNTY, ALABAMA IN EQUITY.	EMMA LOU MCDONELL,		Ž	
JAMES L. MCDOWELL, IN EQUITY.	Complainant,		Ĭ.	IN THE CIRCUIT COURT OF
JAMES L. MCDOWELL, IN EQUITY.	Vs.		χ	BALDWIN COUNTY, ALABAMA
Respondent.		: : :		in Equity.
	Respondent.		Ĭ	

To the Honorable Judge of the Circuit Court of Faldwin County,

Sitting in Equity:

Comes now the Complainant, EMMA LOU MCDOWELL, humbly complaining of the Respondent, JAMES L. MCDOWELL, in a matter of divorce, and represents and shows unto Your Honor as follows:

FIRST: That Complainant, Emma Lou McDowell, is over the age of twentyone 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 residing at
144 RR Ave., Andalusia, Alabama.

SECOND: That your Complainant and Respondent were married on or about, to-wit: May 13, 1950, at Lucedale, Mississippi.

THIRD: That Complainant further avers and shows unto your Honor that the said Respondent did on or about the 1st part of August, 1956, and many times prior thereto assault, beat, hit and strike complainant; that said respondent has committed actual violence on her person attended with danger to her health or life; complainant avers and charges that respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

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 which are as follows: A boy, James F. McDowell, aged 5 years, and Barbara McDowell, a girl, aged 4 years; said children are now in the care, custody and control of the Complainant, their mother, who is a fit and proper person to be awarded the permanent care, custody and control of said minor children. Com-

plainant further avers that the Respondent is an able bodied man and is well able to aid in the maintenance and support of the said minor children as set out herein. That the Complainant is now in a destitute condition and has no money with which to pay her solicitor in this cause and that the Respondent is well able to pay the Complainant's Solicitor's fee herein.

PRAYER FOR PROCESS

Wherefore the premises considered the Complainant prays that the said JAMES L. MCDOWELL be made party Respondent to this her Bill of Complaint and that a summons be issued and served upon him as 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 the said decree the Complainant will be granted the right to again contract marriage. The Complainant prays that in and by virtue of the said decree she will be awarded the custody of the minor children born to the union of the said parties. Complainant prays that by virtue of said decree she will be awarded an amount to be paid each month by the Respondent to the Complainant for the support and maintenance of the minor children born to the union of said parties; and that your Honor will decree that the Respondent herein pay the Complainant's Solicitor's fee in this cause in an amount to be determined by the Court.

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

Solicitor for Complainant.

Circuit Court, Baldwin County No. 3993 TERM, TO ANY SHERIFF OF THE STATE OF ALABAMA: You Are Hereby Commanded to Summon James L. McDowell to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint fithe Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against James L. McDowell Emma Lou McDowell by Emma Lou McDowell Witness my hand this 11th day of March 19_57	The State of Alabama,	Circuit Court, Baldwin Co	unty
TO ANY SHERIFF OF THE STATE OF ALABAMA: You Are Hereby Commanded to Summon James L. McDowell to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint fithe Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against James L. McDowell Emma Lou McDowell by Plain	Baldwin County.	No. 3993	myanar -a
You Are Hereby Commanded to Summon James L. McDowell to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint fi the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against James L. McDowell Emma Lou McDowell by Plain		·	TERM, 19_
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the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against			
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No. 2420 2773 Page	•	Defendant lives at
The State of Alabama Baldwin County	•	
CIRCUIT COURT		Received In Office
EMMA LOU MCDOWELL		, Sheriff
Plaintiffs		I have executed this summons
. vs.		this19
		by leaving a copy with
JAMES L. MCDOWELL	•	
Defendants		-
Summons and Complaint		· · · · · · · · · · · · · · · · · · ·
Filed1hth - March19-57		· · · · · · · · · · · · · · · · · · ·
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Plaintiff's Attorney		Sheriff
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Defendant's Attorney		Deputy Sheriff

THE STATE OF ALABAMA, BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama (In Equity)

		EMMA LOU MCDOWEL	····	COMPLAINANT	
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in	Robertsdale	, Alabama,	and having fir	st sworn said witness.	es to speak the
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My name is Helen Buckhault. I have known Dmma Lou McDowell and James L. McDowell for more than the past year. James and Emma Lou are both over the age of twenty-ene years of age. Emma Lou is a resident of Baldwin County, and has been a bona fide resident for more than the past five years. James is now residing at Andalusia, Alabama, James and Emma Lou were married on May 13, 1950, at Lucedale, Mississippi. James has made many threats of doing her bodily harm and from his manner and conduct toward her, I am convinced that if they continue to live together, he will commit an actual violence upon her which would endanger her life and health. The last of these threats did occur on _________, 1950, and as a result of these threats they have not lived together as bushand and wife since that time. Emma Lou and James had two children, namely, James F. McDowell, a boy, aged five years in February, and Barbara McDowell, a girl, aged four in April. Said children are now in her custody, care and control, and I feel that she is a fit and proper person to be awarded the permanent care, custody and control of said minor children.

Helen Buckhault.

I, Delta H. Gwaltney	as Register and Commissioner h	ereby certify
that the foregoing deposition on Oral Examina	tion was taken down in writing by me	in the words
of the witnesses and read over to them	and they signed the same in th	e presence of
myself and <u>James A. Hendrix</u>		
at the time and place herein mentioned; that I had	ave personal knowledge of personal id	lentity of said
witness es or had proof made before me of the	· ·	
counsel or of kin to any of the parties to said car	and the second s	and the second section of the second
I enclose the said Oral Examination in		Court.
Given under my hand and seal, this /	day of April	19 <u>57</u> .
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THE STATE OF ALABAMA Baldwin County

Circuit Court

TO:	DELTA	H. GWALTNEY			Same V	200 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		N 1
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Commiss	sioner, and	by these pres	ents do authori	ze you, as	such time	and place	as you ma	ay appoint,
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THE STATE OF ALA Baldwin County	
CIRCUIT COU	JRT
EMMA LOU MCDOVELL	
Co	mplainant
vs.	
JAMES L. MCDOWELL	
4 *	
Opposition (
	Defendant
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COMMISSIONER:	
Delta H. Gvaltney	
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Emma Lou McDowell	
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No.	
THE STATE OF ALABAMA Baldwin County	
IN EQUITY Circuit Court of Baldwin County	
EMMA LOU MCDOWELL	:
vs.	
JAMES L. MCDOWELL	The state of the s
NOTE OF TESTIMONY	
riled in Open Court this L. L. D., 194	The state of the s
rinted by the Baldwin Times	en en derej by en

EMMA LOU MCDOWELL,		X	
Complainant,		Ĭ	IN THE CIRCUIT COURT OF
vs.	: .	X	BALDWIN COUNTY, ALARAMA
JAMES L. MCDOWELL,	:	Ĭ.	IN EQUITY.
Respondent.	; ; ;		

ANSWER AND WAIVER

Comes now the Respondent, James L. McDowell, 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 her 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 I. McDowell

Sworn to and subscribed before me this day of April, 1957.

County, Alabana. County,