

4051

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BETTY LOUISE DANIELS

Complainant

vs.

JACOB DANIELS, JR.

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 BETTY LOUISE DANIELS is forever divorced from the said JACOB DANIELS, JR. for and on account of Cruelty.

It is further ordered, adjudged and decreed that the care, custody and control of the minor child, Mary Louise Daniels, be in the Complainant.

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 Betty Louise Daniels the Complainant pay the cost herein to be taxed, for which executed may issue.

This 13 day of June 1957

Hubert M. Wallace

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 day of June, 1957

Register of Circuit Court, In Equity.

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

BETTY LOUISE DANIELS

Complainant

vs.

JACOB DANIELS, JR.

Respondent

DIVORCE DECREE

FILED

JUN 13 1957

ALICE J. DWCK, Register

BETTY LOUISE DANIELS

vs.

JACOB DANIELS, JR.

THE STATE OF ALABAMA

Baldwin County

IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, \_\_\_\_\_  
and Oral Testimony

and in behalf of Defendant upon \_\_\_\_\_ Answer and Waiver

*to  
Present to Plaintiff  
with Complaint*

*Henry J. D...  
Register.*

No. ....

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

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

**BETTY LOUISE DANIELS**

vs.

**JACOB DANIELS, JR.**

**NOTE OF TESTIMONY**

Filed in Open Court this .....

day of **FILED** ....., 194

**JUN 13 1957**

Register.

**ALICE L. BERRY** Register  
Printed by the Baldwin Times & States

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Betty Clark

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 Betty Louise Daniels

a witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Betty Louise Daniels

and Jacob Daniels, Jr., Complainant

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

Witness H. [unclear] day of June, 1957

[Signature]  
Register.

Commissioner's Fee, \$ \_\_\_\_\_

Witness' Fees, \$ \_\_\_\_\_



THE STATE OF ALABAMA,  
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama  
(In Equity)

Betty Louise Daniels COMPLAINANT

vs.

Jacob Daniels, Jr. RESPONDENT

I, Betty Clark

as Register and Commissioner

have called and caused to come before me Betty Louise Daniels

witness named in the requirement for Oral Examination, on the 5<sup>th</sup> day of June

19 57, at the office of Ernest M. Bailey

in Fairhope, Alabama, and having first sworn said witness to speak the

truth, the whole truth, and nothing but the truth, the said Betty Louise Daniels

doth depose and say as follows:

STATEMENT OF BETTY LOUISE DANIELS:

My name is Betty Louise Daniels and I am the Complainant in the above styled cause. The Respondent's name is Jacob Daniels, Jr. and we are both bona fide residents of Baldwin County, Alabama, residing in Fairhope, Alabama. We were married in Fairhope, Alabama and lived together as husband and wife until on December 22, 1956.

On December 26, 1956 and at times prior thereto, the Respondent committed acts of violence on my person, attended with danger to my life and health. In my opinion, and from his attitude and conduct towards me, if I continue to live with him he will commit physical harm to my person, attended with danger to my life and health.

Betty Louise Daniels  
BETTY LOUISE DANIELS

I, Betty Clark as ~~Register~~ and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness \_\_\_\_\_ and read over to her and she signed the same in the presence of myself and Ernest M. Bailey \_\_\_\_\_ at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness \_\_\_\_\_ or had proof made before me of the identity of said witness \_\_\_\_\_; 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 envelope to the Register of said Court.

Given under my hand and seal, this 5<sup>th</sup> day of June, 1957.

Betty Clark (L. S.)

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

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

BETTY LOUISE DANIELS

COMPLAINANT

VS.  
JACOB DANIELS, JR.

RESPONDENT

ORAL DEPOSITION

Filed \_\_\_\_\_, 19\_\_\_\_

Register.

FILED  
RECORDED IN  
1957

Record

Vol. \_\_\_\_\_ Page \_\_\_\_\_

Register.



BETTY LOUISE DANIELS,  
Complainant

vs.

JACOB DANIELS, JR.,  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

ANSWER AND WAIVER

Comes the Respondent in the above styled cause and for answer to the Bill of Complaint filed in said cause and each and every paragraph thereof separately and severally, says:

1. Respondent admits the allegations of the first paragraph of the Bill of Complaint.

2. Respondent admits the allegations of the second paragraph of the Bill of Complaint as to the date of marriage and date of separation but denies all other allegations of this paragraph and demands strict proof of the same.

3. Respondent admits the allegations of the third paragraph of the Bill of Complaint.

Respondent hereby accepts service of a copy of the Summons and Complaint in this cause and waives further service of the same. Respondent also waives notice of the taking of testimony in this cause and notice of submission of the same and agrees that the testimony may be taken and the cause submitted without further notice to him.

*Jacob Daniels Jr.*  
RESPONDENT

Sworn to and subscribed before me this the 3<sup>rd</sup> day of June, 1957.

*Lawrence M. Bailey*  
NOTARY PUBLIC, STATE OF ALABAMA  
AT LARGE

ANSWER AND WAIVER

\* \* \* \* \*

BETTY LOUISE DANIELS,  
COMPLAINANT

VS.

JACOB DANIELS, JR.  
RESPONDENT

\* \* \* \* \*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED  
JUN 18 1957  
ALICE J. DECK, Register

STATE OF ALABAMA  
COUNTY OF BALDWIN

§  
§

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Jacob Daniels, Jr. to appear and plead, answer or demur, within thirty days from the service of this writ, to the Bill of Complaint filed in the circuit court of Baldwin County, Alabama, in Equity, by Betty Louise Daniels, as Complainant, against Jacob Daniels, Jr., as Respondent.

Witness my hand this the \_\_\_\_\_ day of June, 1957.

REGISTER

BETTY LOUISE DANIELS,  
Complainant

vs.

JACOB DANIELS, JR.,  
Respondent

§

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

§

§

Comes your Complainant, Betty Louise Daniels, and files this her Bill of Complaint for divorce against Jacob Daniels, Jr., and shows unto Your Honor and unto this Honorable Court as follows:

FIRST:

That your Complainant and the Respondent are over the age of twenty-one years and are bona fide residents of Baldwin County, Alabama.

SECOND:

That the Complainant and the Respondent were married on, heretofore, to-wit, September 10, 1953 in Fairhope, Alabama and lived together as husband and wife until on, to-wit, December 22, 1956, when on account of the matters hereinafter complained of, your Complainant was compelled to live separate and apart from the Respondent; that on December 22, 1956 and at times prior thereto, the Complainant

states that on that occasion the Respondent threatened and did do bodily harm to her person; that on numerous occasions the Respondent became violent and abused her physically and that, from his manner and conduct towards her, she is reasonably certain that he will commit violence upon her person, attended with danger to her life and health.

THIRD:

The Complainant and the Respondent have one child born of this marriage, viz: Mary Louise Daniels, aged four years. That the Complainant is a fit and proper person to have the care, custody and control of the said minor child.

PRAYER FOR PROCESS AND RELIEF:

The premises considered, your Complainant prays that the above named Jacob Daniels, Jr. be made a party Defendant to this cause by the usual writ or process of this Honorable Court requiring him to appear and plead, answer or demur within the time and under the penalties prescribed by the rules of this Court and the Statutes in such cases made and provided. That upon a final hearing of this cause Your Honor will grant unto the Complainant an absolute divorce from the Respondent and that Your Honor will also decree that the Complainant may remarry if she sees fit. That Your Honor will grant unto the Complainant the care, custody and control of the said minor child. Your Complainant further prays for such other, further and different relief to which she may be entitled and as in duty bound she will ever pray.

*Betty Louise Daniels*  
BETTY LOUISE DANIELS

STATE OF ALABAMA )  
BALDWIN COUNTY )

Before me, the undersigned authority, personally appeared Betty Louise Daniels, who being by me first duly sworn, deposes and says: That the foregoing statements are true and correct.

*Betty Louise Daniels*  
BETTY LOUISE DANIELS

Sworn to and subscribed before me this 3<sup>rd</sup> day of June, 1957.

*Charles M. Bailey*  
SOLICITOR FOR COMPLAINANT  
Notary Public

4057

SUMMONS AND BILL OF COMPLAINT

\*\*\*\*\*

BETTY LOUISE DANIELS,  
COMPLAINANT  
VS.  
JACOB DANIELS, JR.  
RESPONDENT

\*\*\*\*\*

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

FILED  
JUN 13 1957  
ALICE J. DUCK, Register