

17054

DIVORCE DECREE

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The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

EVA LUCILLE LAMBERT

Complainant

vs.

ALBERT D. LAMBERT

Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Conesso by~~ Waiver and Answer 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

EVA LUCILLE LAMBERT

is forever divorced from the

said ALBERT D. LAMBERT

for and on account of

"CRUELTY"

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 futher 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 EVA LUCILLE LAMBERT the Complainant pay the cost herein to be taxed, for which executed may issue.

This 24 day of June 19 57

Albert 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.

No. _____ Page _____

**THE STATE OF ALABAMA
BALDWIN COUNTY**

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

JUN 24 1957

ALICE J. DUCK, Register

THE STATE OF ALABAMA,

BALDWIN COUNTY

CIRCUIT COURT, BALDWIN COUNTY

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Albert D. Lambert

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 _____

Albert D. Lambert, Defendant

by Eva Lucille Lambert

_____, Plaintiff.....

Witness my hand this 17th day of June 1957.....

Eva Lucille Lambert Clerk

No. 4054 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

CIRCUIT COURT

EVA LUCILLE LAMBERT

Plaintiffs

vs.

ALBERT D. LAMBERT

Defendants

SUMMONS and COMPLAINT

Filed 6-17-57, 19.....

Alice J. Duck, Clerk

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

RECEIVED IN OFFICE

June 17, 1957

Myler Wilkins, Sheriff

I have executed this summons

this 6/17, 1957

by leaving a copy with

Albert D. Lambert

Myler Wilkins, Sheriff

C. Lindel, Deputy Sheriff

Q. Myler

EVA LUCILLE LAMBERT,	0	
	0	
Complainant,	0	IN THE CIRCUIT COURT OF
	0	
VS.	0	BALDWIN COUNTY, ALABAMA.
	0	
ALBERT D. LAMBERT,	0	IN EQUITY. NO. _____
	0	
Respondent.	0	

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

Your complainant, EVA LUCILLE LAMBERT, respectfully represents and shows unto your Honor as follows:

1. That complainant is over the age of twenty-one years and is a resident of said County and State; that ALBERT D. LAMBERT, also known as A. D. LAMBERT, is over the age of twenty-one years and is a resident of said County and State;

2. That your Complainant and the Respondent were lawfully married on or about, to-wit: the 14th day of May, 1953, at Lucedale, Mississippi;

3. Your complainant avers and charges that the said respondent did, on or about the 10th day of June, 1957, curse, abuse, and threaten to commit an actual violence on her person; that on many occasions prior to that time he had committed actual violence on her person attended with danger to her life or health; and that on the said 10th day of June, because of his manner and conduct toward her, she became reasonably convinced that, should she continue to live with him as his wife, he would carry out his threats and commit an actual violence on her person which would necessarily endanger her life or health; and, for that reason, she was forced to leave the said respondent on the aforesaid 10th day of June, 1957.

4. That, during most of their four years of marriage, complainant has been forced to support and maintain herself and her child with little or no financial help from the respondent; that your complainant is without funds with which to pay her Solicitor in this cause; and that it has been necessary for her to employ Telfair J. Mashburn, Jr., Esq., to represent her in this cause.

5. That the respondent earns good wages when he will work, and that he is an able-bodied man; and that your complainant is unable to earn enough to support and maintain herself.

PRAYER FOR PROCESS

WHEREFORE, THE PREMISES CONSIDERED, your complainant makes the said ALBERT D. LAMBERT a party respondent to this her bill of complaint, and, in order that she may have the relief hereinafter prayed for, may it please your Honor to cause the State's Writ of Subpoena to be issued, directed to the said ALBERT D. LAMBERT, commanding him to plead, answer or demur to this bill of complaint within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF

Complainant prays that, on a final hearing of this cause, your Honor will make and enter a decree granting and giving unto your Complainant the following separate and several relief:

1. Divorcing complainant from the respondent.
2. Fixing a reasonable sum for the respondent to pay to complainant by way of alimony for her support and maintenance.
3. Fixing a reasonable sum for the respondent to pay to your complainant's solicitor for his services in this cause.

And if your complainant is mistaken in the relief for which she has asked, or to which she is entitled, then she prays for such other, further, different or general relief as in equity and good conscience she may be entitled to receive, and, as in duty bound, she will ever pray, etc.

Julius R. Masbury, Jr.
SOLICITOR FOR COMPLAINANT.

EVA LUCILLE LAMBERT,
Complainant,
VS.
ALBERT D. LAMBERT,
Respondent.

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

Comes the complainant, EVA LUCILLE LAMBERT, and amends her bill of complaint heretofore filed in this cause by striking therefrom paragraphs numbered 4 and 5.

Justin A. Madbery, Jr.
SOLICITOR FOR COMPLAINANT.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.

IN EQUITY. NO. _____

EVA LUCILLE LAMBERT,
Complainant,

VS.

ALBERT D. LAMBERT,
Respondent.

AMENDMENT TO BILL OF COMPLAINT.

Filed
6-21-57
Arce French
Reg

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama

(In Equity)

EVA LUCILLE LAMBERT

Complainant

VS.

ALBERT D. LAMBERT

Respondent

DORIS BROWN

I,

as ~~Register and~~ Commissioner

have called and caused to come before me EVA LUCILLE LAMBERT

witness named in the Requirement for Oral Examination, on the 7 day of June 1957, at the office of Telfair J. Mashburn, Jr.

in Bay Minette, Alabama, and having first sworn said Witness to speak the truth, the whole truth, and nothing but the truth, the said EVA LUCILLE LAMBERT

doth depose and say as follows: "My name is Eva

Lucille Lambert. I am the complainant in this cause and I am over the age of twenty-one years. I live in Bay Minette, Baldwin County, Alabama, and was living there at the time my husband and I separated. My husband is over the age of twenty-one years and is a resident of Baldwin County, Alabama. I was married to Albert D. Lambert, also known as A. D. Lambert on the 14th day of May, 1953, at Lucedale, Mississippi. It was not long after our marriage that my husband began to show a streak of jealousy and a violent temper, which was particularly evident when he was under the influence of intoxicating beverages. On several occasions he actually struck me. Finally, on the night of the 10th day of June, 1957, he came home drinking and in a violent temper and threatened and abused me so violently that I became convinced that, if I continued to live with him as his wife, he would do actual violence to my person which would be dangerous to my life or health. I left him at that time and have not returned to live with him as his wife, and I am convinced that we can never live together as husband and wife." Further deponent says not.

Eva Lucille Lambert

ORAL EXAMINATION.

I, DORIS BROWN, 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 _____ and read over to her and she signed the same in the presence of myself _____ and Telfair J. Mashburn, Jr.

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 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 21st day of June, 1957

Doris Brown (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

EVA LUCILLE LAMBERT

vs. Complainant

ALBERT D. LAMBERT

Respondent.

Oral Deposition

Filed 6-21, 1957

Leige J. Mack, Register.
Recorded in _____

Vol. _____ Page _____ Record _____

Register _____

The State of Alabama, }
Baldwin County

EVA LUCILLE LAMBERT

Complainant

vs.

ALBERT D. LAMBERT

Defendant

CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

In Equity.

The Complainant

requests the oral examination of the following named witnesses, on behalf of the

Complainant

Eva Lucille Lambert

viz:

said witnesses reside in the County of Baldwin

State of Alabama.

Doris Brown

who resides at

Bay Minette, Alabama

or, The Register of this Court is suggested as a suitable person
to be appointed Commissioner to take the deposition of said witness on such oral examination.

Jeffery Maschberg

Solicitor for Complainant

CIRCUIT COURT OF
Baldwin County, Alabama

IN EQUITY

EVA LUCILLE LAMBERT

Complainant

vs.

ALBERT D. LAMBERT

Defendant

DEMAND FOR ORAL EXAMINATION

Filed 6-21 1957

Deice J. Daulton Register.

Moore Printing Co. :::: Bay Minette, Ala.

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: DORIS BROWN

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Commissioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you and examine EVA LUCILLE LAMBERT

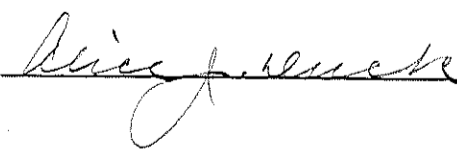
as witnesses in behalf of EVA LUCILLE LAMBERT in a cause pending in our Circuit Court in Baldwin County, of said State, wherein EVA LUCILLE LAMBERT

is the _____, Complainant
and ALBERT D. LAMBERT

Respondent.

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

Witness 21 day of June, 1947


Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

**THE STATE OF ALABAMA
Baldwin County**

CIRCUIT COURT

EVA LUCILLE LAMBERT

Complainant

VS.

ALBERT D. LAMBERT

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

I, _____, Commissioner of the Circuit Court of Baldwin County, Alabama, do hereby certify that the within and foregoing is a true and correct copy of the deposition of _____ taken on the _____ day of _____, 19____, at _____, Alabama, in the case of _____ vs. _____, docketed for trial on the _____ day of _____, 19____, in Case No. _____ of the Circuit Court of Baldwin County, Alabama.

I, _____, _____, do hereby certify that the within and foregoing is a true and correct copy of the deposition of _____ taken on the _____ day of _____, 19____, at _____, Alabama, in the case of _____ vs. _____, docketed for trial on the _____ day of _____, 19____, in Case No. _____ of the Circuit Court of Baldwin County, Alabama.

I, _____, _____, do hereby certify that the within and foregoing is a true and correct copy of the deposition of _____ taken on the _____ day of _____, 19____, at _____, Alabama, in the case of _____ vs. _____, docketed for trial on the _____ day of _____, 19____, in Case No. _____ of the Circuit Court of Baldwin County, Alabama.

EVA LUCILLE LAMBERT

vs.
ALBERT D. LAMBERT

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, _____
Waiver and Answer, and testimony of Eva Lucille Lambert.

and in behalf of Defendant upon Waiver and Answer

Selma J. McArthur Jr.

Wesley J. ...
Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

vs.

NOTE OF TESTIMONY

Filed in Open Court this 21

day of June, 1947

Dee J. W. ...
Register.

EVA LUCILLE LAMBERT,
Complainant,
VS.
ALBERT D. LAMBERT,
Respondent.

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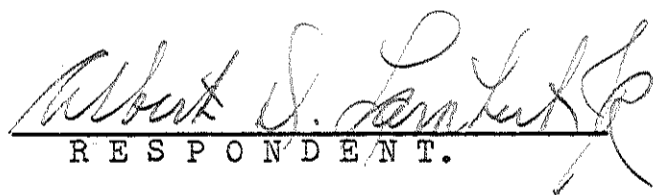
IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA.
IN EQUITY. NO. _____

WAIVER AND ANSWER

Comes the respondent in the above styled cause and accepts service of a bill of complaint filed in this cause; waives notice of the filing of interrogatories in said cause, and the right to cross same; waives notice of the taking of testimony in said cause, and consents that the same may be taken and the cause submitted for final decree at any time.

And for answer to the bill of complaint heretofore filed in said cause, respondent says:

1. He admits the allegations contained in paragraph 1 of said bill of complaint.
2. He admits the allegations contained in paragraph 2 of said bill of complaint.
3. He denies each and every allegation contained in paragraph 3 of said bill fo complaint and demands strict proof of the same.


RESPONDENT.

Lambert
vs.
Lambert

Waiver and
Answer

Filed 6-21-57
Henry H. Hensch
Register

4054