

4386

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

-----WINONA C. JONES-----, Complainant

vs.

-----JACK JONES-----, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree~~ ~~Pro~~ ~~Con~~ ~~cesso~~ on ~~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 ~~Winona C. Jones~~----- is forever divorced from the said ~~Jack Jones~~----- for and on account of cruelty; the agreement of the parties with reference to custody of the minor child, Jaccueliene V. Jones and support of said minor child, property and alimony rights and agreements is approved and incorporated into this decree, and the parties are ordered to abide by the terms of said agreement. It is further ordered that Winona C. Jones the Complainant pay the cost herein to be taxed, for which executed may issue.

It is futher 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 futher ordered that ~~Winona C. Jones th~~----- the ~~Complainant~~----- pay the cost herein to be taxed, for which executed may issue.

This 13 day of October 1958

Habert 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

Winona C. Jones

Complainant

vs.

Jack Jones

Respondent

DIVORCE DECREE

FILED

OCT 13 1958

ALICE J. DUCK, CLERK
REGISTERED

AGREEMENT OF PARTIES CONTEMPLATING A DIVORCE WITH REFERENCE
TO CUSTODY OF CHILDREN, SUPPORT OF CHILDREN, AND PROPERTY RIGHTS

STATE OF ALABAMA
BALDWIN COUNTY

This agreement, made and entered into in triplicate, by and between Jack Jones, hereinafter called husband, and Winona C. Jones, hereinafter called wife, witnesseth:

That whereas, various and divers disputes and unhappy differences have arisen between husband and wife, and they are separated and not now living together as husband and wife, and whereas it is the desire of the parties hereto to make a complete and final settlement of all their property, and to settle and adjust all marital interests, now, therefore, this agreement is made as follows:

1. The wife shall have the care, custody, and control of the minor child, Jacqueline V. Jones. The husband shall have the right of visitation at reasonable times and places.

2. The husband shall pay to the wife the following sums for the support and maintenance for the minor child until said child shall have attained the age of twenty-one years: The sum of \$110.00 per month for one year, beginning on the 1st day of the month following execution of this agreement; thereafter, until said minor child attains the age of twenty-one years the sum of \$77.10 per month.

3. The husband further agrees and does hereby release and transfer to the wife as her sole property, all furniture and household furnishings owned by the parties.

4. It is further agreed that any and all property acquired by either parties subsequent to the date of this agreement shall be the separate property of the party acquiring same; and each party agrees to execute for the other any and all papers necessary to complete the transfer of property herewith divided and apportioned. It is further agreed that the terms of this agreement may be incorporated in any decree of divorce which may be hereafter obtained by either party, and enforced by contempt proceedings if necessary.

5. It is agreed and understood by the parties that in consideration of this agreement, no further alimony shall be due or shall grow due between these parties.

IN WITNESS WHEREOF, we have hereunto set our hands and seals this 2nd day of September, 1957.

Jack Jones (LS)
Jack Jones

Winona C. Jones (LS)
Winona C. Jones

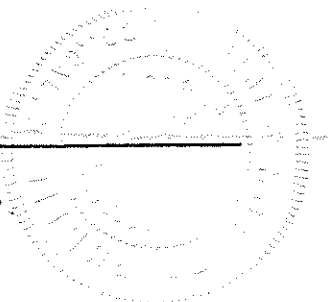
STATE OF CALIFORNIA
IMPERIAL COUNTY

I, the undersigned, a Notary Public in and for said County and State, do hereby certify that Jack Jones, whose name is

signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, he executed the same voluntarily on the day the same bears date.

2nd Given under my hand and official seal of office on this the day of September, 1957.

James J. Felt
NOTARY PUBLIC
my comm exp 1-6-60

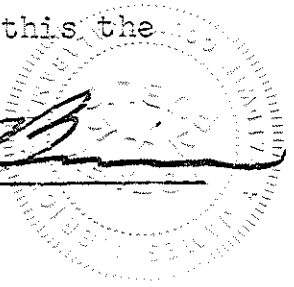


STATE OF ALABAMA
BALDWIN COUNTY

I, the undersigned, a Notary Public in and for said County and State, do hereby certify that Winona C. Jones, whose name is signed to the foregoing instrument, and who is known to me acknowledged before me on this day that, being informed of the contents of the instrument, she executed the same voluntarily on the day the same bears date.

20 Given under my hand and official seal of office on this the day of September, 1957.

James A. [Signature]
NOTARY PUBLIC



WAIVER AND ANSWER

WINONA C. JONES)	IN THE CIRCUIT COURT OF
	:	
Complainant)	BALDWIN COUNTY, ALABAMA
	:	
VS.)	IN EQUITY
	:	
JACK JONES)	
	:	
Respondent)	

Comes the Respondent in the above styled cause and accepts service of a Bill of Complainant filed heretofore in said 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.

And for answer to the Bill of Complaint heretofore filed in this cause, Respondent says:

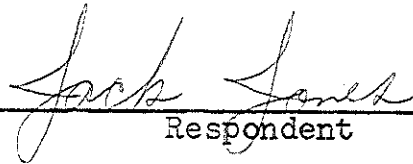
1. He admits the allegations contained in Paragraph 1 of said Bill of Complaint.

2. He admits the allegations contained in Paragraph 2 of said Bill of Complaint.

3. He admits the allegations contained in Paragraph 3 of said Bill of Complaint.

4. He admits the allegations contained in Paragraph 4 of said Bill of Complaint.

5. He denies each and every allegation contained in Paragraph 5 of said Bill of Complaint and demands strict proof thereof.


Respondent

STATE OF CALIFORNIA

IMPERIAL COUNTY

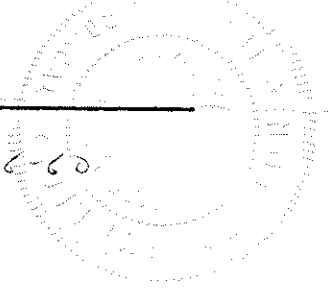
I, Doris J. Smith, a Notary Public in and for said County and State, do hereby certify that Jack Jones, whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed

of the contents of the instrument, she executed the same voluntarily on the day the same bears date.

IN WITNESS WHEREOF, I hereunto set my hand and official seal on this the 2nd day of September, 1958.

Doris J. Fields
Notary Public

My comm. exp. 1-6-60



RECEIVED
SEP 24 1958
STATE OF MICHIGAN
NOTARY PUBLIC

BILL OF COMPLAINT

WINONA C. JONES)	IN THE CIRCUIT COURT OF
	⋮	
COMPLAINANT)	BALDWIN COUNTY, ALABAMA
	⋮	
VS.)	IN EQUITY
	⋮	
JACK JONES)	
	⋮	
RESPONDENT)	

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

Comes your complainant, Winona C. Jones, and respectfully avers and shows unto your Honor and to this Court as follows:

1. That your complainant is a bona fide resident of Baldwin County, Alabama, and has been such for more than one year next preceeding the filing of this cause; that the respondent, Jack Jones is over the age of twenty-one years.

2. That your complainant and the respondent intermarried at Lucedale, Mississippi, on, to-wit: September 2, 1955, and ever since have been and are now husband and wife.

3. That there has been born of said marriage, one child, Jacqueline V. Jones, age 2; that said minor child is now under the care and custody of your complainant.

4. That your Complainant and the respondent have entered into an agreement with reference to a property settlement, and support and custody of the said minor child, which agreement is attached hereto as Exhibit "A" and made a part hereof as though fully set forth herein.

5. Your complainant further avers and charges that on the 17th day of May, 1958, the respondent, without cause or justification, using his hands and closed fists, struck and beat your complainant about the face and body a number of times, inflicting bruises and injuries upon the body of your complainant, attended with great danger to her health and life; and from his manner and conduct toward her, she is reasonably convinced that he will commit further actual physical violence

upon her person attended with danger to her health and life; that on, to-wit: the 2nd day of June, 1958, she separated from and abandoned the said respondent, and is now living separate and apart from him.

THE PREMISES CONSIDERED, your complainant prays that the respondent be made a party respondent to this Bill of Complaint by the usual process of this Honorable Court, and the statutes in such cases made and provided, requiring him to plead, answer or demur, within the time and within the manner provided by law; and that on the final hearing of this cause that Your Honor will enter a decree divorcing your complainant from the said respondent, granting both parties the right to remarry, awarding the custody and control of said minor child unto your complainant, and decreeing that the respondent shall pay the sum of \$110.00 per month to the complainant for one year, thereafter \$77.10 per month for the support and maintenance for said minor child. And complainant further prays that Your Honor will grant such other, further, different, and general relief to which the complainant may be entitled as in duty bound she will ever pray.


Solicitor for Complainant

WYNONA C. JONES

Complainant

vs.

JACK JONES

Respondent

THE STATE OF ALABAMA

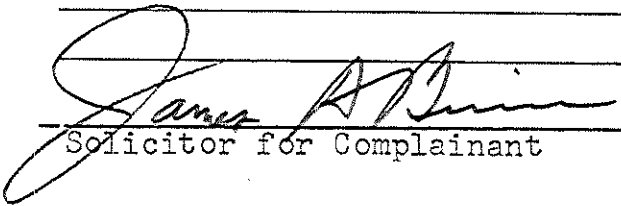
Baldwin County

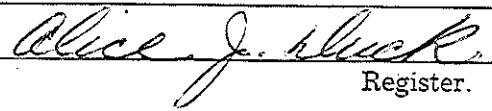
IN EQUITY

Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, _____
and testimony by deposition _____

and in behalf of Defendant upon answer and waiver _____


Solicitor for Complainant


Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

WINONA C. JONES

Complainant

vs.

JACK JONES

Respondent

NOTE OF TESTIMONY

Filed in Open Court this

day of **FILED** , 194

SEP 24 1958

ALICE J. DUCK, Registered Register.

Printed by the Baldwin Times

THE STATE OF ALABAMA }
Baldwin County }

Circuit Court of Baldwin County, Alabama,
(In Equity)

WINONA C. JONES COMPLAINANT

vs.

JACK JONES RESPONDENT

I, Bonnie Parker

as Register and Commissioner

have called and caused to come before me Winona C. Jones

witness named in the requirement for Oral Examination, on the 20th day of September
1958, at the office of James A. Brice

in Foley, Alabama, and having first sworn said witness to speak the
truth, the whole truth, and nothing but the truth, the said Winona C. Jones

doth depose and say as follows:

My name is Winona C. Jones; I am the Complainant in that certain divorce action pending in Baldwin County Circuit Court against Jack Jones; the Respondent, Jack Jones and I are both over the age of 21 years; I have been a life-long resident of Baldwin County, Alabama, residing at Robertsdale; we were married in Lucedale, Mississippi on the 2nd day of September, 1955, and we have one child, Jacqueliene V. Jones who is two years of age; we moved to California temporarily arriving there in November, 1957; my husband has been given to moodiness and provoking arguments without any reason ever since the first months of our marriage; On May 17, 1958, when he came home from work he was in one of his bad moods; he tried to goad me into an argument, but I wouldn't argue; then he became violent, at first shouting and throwing furniture and dishes around the house; I went into the bedroom and closed the door, and he kicked the door in and came at me and struck me in the face and chest with his closed fists; my mouth began to bleed and one eye was swollen from where he had hit me; when he came at me again he threaten to knock my head off and I was mortally afraid and I ran from the house; I sent someone back to get my daughter, and I left him and we haven't lived together since then; I am deeply fearful of further bodily harm if I ever see him again. We have entered into a property and custody settlement, which is reasonable;

Further deponent saith not.

Winona C. Jones

I, Bonnie Parker 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 James A. Brice 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 20 day of Sept. 1958.

Bonnie Parker (L. S.)

No. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

WINONA C. JONES

COMPLAINANT

JACK JONES

vs.

RESPONDENT

ORAL DEPOSITION

FILED

Filed SEP 24 1958, 1958

ALICE J. DUCK, Register, Register.

RECORDED IN

Record

Vol. _____ Page _____

Register

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