

(4810)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

----- ERNESTINE L. JACOBS -----, Complainant

vs.

----- SCHUYLER RAY JACOBS -----, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~DECEASED BY DEATH~~ ~~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
Ernestine L. Jacobs is forever divorced from the
said Schuyler Ray Jacobs for and on account of

CRUELTY

IT IS FURTHER ORDERED, ADJUDGED AND DECREED, that
Ernestine L. Jacobs be allowed to resume the use of the name
of Ernestine L. Moore.

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 Ernestine L. Jacobs
the Complainant pay the cost herein to be taxed, for which executed may issue.

This 6th day of January 1960

J. Hubert Moore

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.

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No. 4-810 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

JAN 6 1960

ALICE J. DUCK, Register

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

ERNESTINE L. JACOBS

COMPLAINANT

vs.

SCHUYLER RAY JACOBS

RESPONDENT

I, Ophelia J. Quinley

as Register and Commissioner

have called and caused to come before me Ernestine L. Jacobs and Henry Radde

witnesses named in the requirement for Oral Examination, on the 5th day of January
19 60, at the office of John V. Duck

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

truth, the whole truth, and nothing but the truth, the said Ernestine L. Jacobs and

Henry Radde

doth depose and say as follows:

TESTIMONY OF ERNESTINE L. JACOBS

My name is Ernestine L. Jacobs. I am the Complainant in the above styled cause. I am over the age of twenty-one years and have been a resident of Baldwin County, Alabama for more than one year from the date of the filing of this Bill of Complaint.

The Respondent, Schuyler Ray Jacobs, is over the age of twenty-one years and is a resident of Baldwin County, Alabama. The Respondent and I were married in New Albany, Indiana on the 11th day of December, 1950, and we lived together as husband and wife until about the 14th day of November, 1959. That on the 14th day of November, 1959, and at previous times thereto, the respondent cursed, threatened and abused me and threatened to do actual violence to my person, which made me fear for my life and health. That the conduct of the Respondent was such that I do actually believe that if I continued to live with him he would do violence to my person which would endanger my life and health.

We have no children. I would like to resume the use of the name of Ernestine L. Moore.

Ernestine L. Jacobs
Ernestine L. Jacobs

TESTIMONY OF HENRY RADDE

My name is Henry Radde. I am personally acquainted with the parties in this action.

I know of my own knowledge that they have been having marital trouble for quiet a while, in the past.

I believe it would be the best for all parties that this divorce be granted.

Henry H. Radde
Henry Radde

ORAL EXAMINATION

I, Ophelia J. Quinley 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 es and read over to me and they signed the same in the presence of myself and John V. Duck at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proof made before me of the identity of said witness es; 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 5th day of January, 19 60.

Ophelia J. Quinley (L. S.)

No. 4818 Page

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Christina S. Jacobs

COMPLAINANT

VS.

Stephen Ray Jacobs

RESPONDENT

ORAL DEPOSITION

Filed

FILED

, 19

JAN 6 1960

Register.

ALICE J. DUCK
CLERK
REGISTER
RECORDED IN

Record

Vol.

Page

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Ophelia J. Quinley

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 Ernestine L. Jacobs and Henry Radde

a witness in behalf of Ernestine L. Jacobs
Circuit Court in Baldwin County, of said State, wherein

in a cause pending in our

Ernestine L. Jacobs

, Complainant

and

Schuyler Ray Jacobs

Respondent

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

Witness 5th day of January

, 1950

Alvin J. Dismore
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 4810

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Ernestine L. Jacobs

Complainant

VS.

Schuyler Ray Jacobs

Defendant

COMMISSION TO TAKE DEPOSITION

FILED
COMMISSIONER:

JAN 6 1960

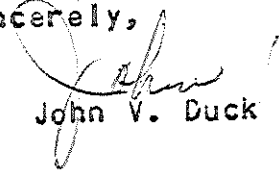
ALICE L. DICK, CLERK
REGISTER
WITNESSES:

JOHN V. DUCK
ATTORNEY AT LAW
FAIRHOPE, ALA.
Jan. 5th, 1960

Dear Miss. Alice:

Enclosed you will find complete Divorce.
Please give to the Judge. I will pay the Court cost
to you thursday.

Sincerely,


John V. Duck

JVD:oq
Encl.

ERNESTINE L. JACOBS

vs.

SCHUYLER RAY JACOBS

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,
And testimony of Ernestine L. Jacobs and Henry Radde

and in behalf of Defendant upon Answer and Waiver

Handwritten signature

Handwritten signature
Register.

No. 4810

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Ernestine L. Jacobs

VS.

Schuyler Ray Jacobs

Note of Testimony

Filed in Open Court this _____

day of _____, 19_____

JAN 6 1960

MOORE & DUCK CLERK REGISTER Register.

MOORE PRINTING CO., BAY MINETTE, ALA.

ERNESTINE L. JACOBS
Complainant

-VS-

SCHUYLER RAY JACOBS
Respondent

) IN THE CIRCUIT COURT OF
) BALDWIN COUNTY, ALABAMA
)
) IN EQUITY
)
)
)
)

BILL OF COMPLAINT

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

Your Complainant, Ernestine L. Jacobs, respectfully repre-
sents unto your Honor and this Honorable Court as follows:

I

That your Complainant is a bona fide resident of Baldwin
County, Alabama, and is over the age of twenty-one years, and
has been a resident of the said County, for more than one year
next preceeding the filing of this Bill of Complaint; that the
Respondent is a bona fide resident of Baldwin County, and is
over twenty- one years of age.

II

That your Complainant and the Respondent married in New
Albany, Indiana, on the 11th day of December, 1950, and lived
together as husband and wife in Baldwin County, Alabama, until
on to-wit the 14th day of November, 1959.

III

That on the 14th day of November, 1959, and on various
occasions prior there to, the Respondent threatened and abused
your Complainant and threatened to do actual violence to her
person, which would necessarily endanger her life and health;
that the conduct of the Respondent was such as to give your
Complainant every reasonable apprehension to believe and she
did actually believe that if she continued to live with the
Respondent he would do actual violence to her person, which

would necessarily endanger her life and health.

IV

That there were no children born as a result of this marriage.

WHEREFORE, THE PREMISES CONSIDERED, your Complainant prays that Your Honor will by proper process make the said Schuyler Ray Jacobs, party Respondent to this Bill of Complainant 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 final hearing hereof, Your Honor will enter a decree forever barring the bonds of matrimony existing between the Complainant and the Respondent, and that your Complainant be allowed the right to re-marry should she so desire.

Your Complainant further prays that she be allowed to resume the use of the name of Ernestine L. Moore; Your Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

Ernestine L. Jacobs
Complainant

John V. Duck
Solicitor for Complainant

Filed 1-6-60

4810
Ernestine L. Jacobs
Complainant
vs -
Schuyler Ray Jacobs
Respondent

Bill of Complaint

THE DISTRICT COURT OF THE DISTRICT OF COLUMBIA

FILED
JAN 6 1960
ALICE J. DICK, CLERK
REGISTER

Ernestine L. Jacobs, Complainant, vs. Schuyler Ray Jacobs, Respondent.

That the Respondent, Schuyler Ray Jacobs, is a male white person, born [redacted], residing at [redacted], District of Columbia, and is the Respondent in the above captioned matter.

That the Respondent, Schuyler Ray Jacobs, is a male white person, born [redacted], residing at [redacted], District of Columbia, and is the Respondent in the above captioned matter.

ERNESTINE L. JACOBS
Complainant

-VS-

SCHUYLER RAY JACOBS
Respondent

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ANSWER AND WAIVER

Now comes the Respondent, in his own proper person, and admits the allegations contained in the Bill of Complaint filed in the above styled cause as to ages, residence, and marriage, but denies all other allegations therein contained and demands strict proof of the same.

The Respondent waives notice of the time of taking 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.

Schuyler Ray Jacobs
Respondent

STATE OF ALABAMA
BALDWIN COUNTY

I, *Donald Duck*, a Notary Public, in and for said County, in said State, hereby certify that Schuyler Ray Jacobs, 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 said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 4th day of January, 1960.

Donald Duck
Notary Public
Baldwin County, Alabama

Filed
1-6-60

Ernestine L. Jacobs
 Compliment

4810

Ernestine L. Jacobs
 Compliment

Schuyler Ray Jacobs
 Reprimand

Answer by Wainier

FILED
 JAN 6 1960
 ALICE J. DUCK, CLERK REGISTER

4810

[Faint, mostly illegible text from the reverse side of the page, appearing as bleed-through. Some words like 'complaint', 'reprimand', and 'answer' are faintly visible.]

[Faint handwritten notes at the bottom of the page.]