

(4845)

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

BETTY DELORES BROWN, Complainant

vs.

RONDOL EUGENE BROWN, 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 DELORES BROWN is forever divorced from the said RONDOL EUGENE BROWN for and on account of

CRUELTY

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 BETTY DELORES BROWN the Complainant pay the cost herein to be taxed, for which executed may issue.

This 10th day of February 1960

H. 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.

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No. 4845 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

DIVORCE DECREE

FILED

FEB 10 1960

ALICE J. DUCK, CLERK
REGISTER

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: RUTH K. HOWELL

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 DELORES BROWN

a witness in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein BETTY DELORES BROWN

and RONDOL EUGENE BROWN, Complainant

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 10 day of Feb

, 1950

Alvin J. Houch
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 4845

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

VS. Complainant

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

THE STATE OF ALABAMA
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

BETTY DELORES BROWN

COMPLAINANT

vs.

RONDOL EUGENE BROWN

RESPONDENT

I, RUTH K. HOWELL

as Register and Commissioner

have called and caused to come before me Betty Delores Brown and Viola E. Coleman

witness named in the requirement for Oral Examination, on the 10TH day of February
1960, at the office of

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

truth, the whole truth, and nothing but the truth, the said Betty Delores Brown and Viola
E. Coleman

doth depose and say as follows:

My name is Betty Delores Brown. I am 18 years of age and I live in Bay Minette, Alabama. On July 16, 1958 I was married to Rondol Eugene Brown in Pascagoula, Mississippi. He is 26 years of age and is a resident of Baldwin County, Alabama. We lived together as husband and wife until November 10, 1959. We have no children. From the time I was married Rondol commenced to drink and after a time he stayed drunk merely all the time. He drinks every kind of liquor and is seldom in a sober condition. He also became addicted to seconal which is a narcotic drug and that made him nervous and jumpy and made him act crazy. Many times while we were married he threatened to beat me and during August 1959 beat me about the face and body with his hands. He has threatened to kill me, on one occasion, November 13, 1959 he said he would blow my brains out. I am afraid of him and fear he will injure me.

I am unable to pay an attorney's fee, being un-employed, and he is able to pay a reasonable attorney's fee. It has been necessary to employ Wilson Hayes an attorney to represent me in this case.

Betty Delores Brown

My name is Viola E. Coleman. I am the mother of the Complainant in this case. They were married about July 16, 1958. They lived together until about November 10, 1959. Since they got married Rondol Eugene Brown has become a drunkard. I have almost never been in his presence when he was not under the influence of alcohol. On many occasions I have heard him use extremely abusive language toward my daughter, Betty Delores Brown. In June of 1959 he was in their home and saw him, while he was drunk, throw a whole set of china dishes and glass at her. She had to put her head inside a dish cabinet to keep from being hit on the head with the flying peices. He is a very dangerous person and I believe that if my daughter continue to live with him he will do her bodily harm or kill her. He has never had a job and gives nothing to the support of my daughter. She lives on the charity of relatives.

Viola E. Coleman

ORAL EXAMINATION

I, RUTH K. HOWELL 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 them and they signed the same in the presence of myself and *each other* 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 10th day of February, 1960.

Ruth K. Howell (L. S.)

No. *4645* Page

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

BETTY DELORES BROWN

COMPLAINANT

vs.

RONDOL EUGENE BROWN

RESPONDENT

ORAL DEPOSITION

Filed _____, 19

FILED

FEB 10 1960
ALICE MUCK, CLERK
RECORDED IN REGISTER

Register.

Record

Vol. _____ Page _____

Register.

BETTY DELORES BROWN

COMPLAINANT

vs.

RONDOL EUGENE BROWN

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 of Viola E. Coleman and Betty Delores Brown

and in behalf of Defendant upon answer and waiver.

Wilson Hagen
Attorney for Complainant

Oliver J. White
Register.

m

No. 4845

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

VS.

Note of Testimony

FILED

Filed in Open Court this

FEB 10 1960

day of _____, 19

**ALICE J. DUCK, CLERK
REGISTER**

Register.

STATE OF ALABAMA

COUNTY OF BALDWIN

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon RONDOL EUGENE BROWN to appear within thirty days from the service of this writ in the Circuit Court to be held for said County at the place of holding same, then and there to answer the complaint of Betty Delores Brown.

Witness my hand, this the 10 day of Feb, 1960.

Alice J. Cook
CLERK

BETTY DELORES BROWN

COMPLAINANT

VS

RONDOL EUGENE BROWN

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NUMBER: _____

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

Comes now Your Complainant, Betty Delores Brown, and represents and shows unto Your Honor as follows:

I

That your Complainant is 18 years of age and is a bona fide resident of Baldwin County, Alabama, and that Respondent is 26 years of age and is a bona fide resident of Baldwin County, Alabama.

II

That Complainant and Respondent were married in Pascagoula, Mississippi July 16, 1958 and have lived together as husband and wife until November 10, 1959; there are no children born of this marriage.

III

That since the marriage of Complainant to the said Rondol Eugene Brown, the said Rondol Eugene Brown has used actual violence to her person attended with danger to her life or health, or, from his conduct for there is a reasonable apprehension of such violence; That Your

Complainant left him on, to-wit: November 10, 1959, and is now living separate and apart from him.

Now therefore, the premises considered, Complainant prays that this Honorable court will cause process to issue to the said Respondent, Rondol Eugene Brown requiring him to plead, answer or demur to same within the time allowed by law.

And Complainant further prays that upon final hearing of this cause Your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between Complainant and Respondent and that Your Honor will grant such other, further, different or general relief to which Complainant may be in equity and good conscience entitled.

Filed
2-10-60

Betty Deane Brown
COMPLAINANT

W. C. Hays
SOLICITOR FOR COMPLAINANT

NUMBER: 4-845

BETTY DELORES BROWN

COMPLAINANT

VS

RONDOL EUGENE BROWN

RESPONDENT

IN THE CIRCUIT COURT

BALDWIN COUNTY, ALABAMA

IN EQUITY

FILED

FEB 10 1960

ALICE J. DUCK, CLERK
REGISTER

SUMMONS and DIVORCE
COMPLAINT

Court cost 12.30

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BETTY DELORES BROWN	X	IN THE CIRCUIT COURT OF
COMPLAINANT	X	BALDWIN COUNTY, ALABAMA
VS	X	IN EQUITY
RONDOL EUGENE BROWN	X	CASE NO. _____
RESPONDENT	X	

Now comes the Respondent and accepted service of the summons and complaint in this cause.

The Respondent admits the allegations as to the ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demands strict proof of the same.

The Respondent waives notice of the time of taking of 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.

Rondol Eugene Brown

STATE OF ALABAMA
COUNTY OF Baldwin

I, Frank P. Probst, a Notary Public, in and for said County, in said State, hereby certify that Rondol Eugene Brown, whose name is signed to the foregoing conveyance, and who is known to me, acknowledged before me on this day that being informed of the contents of the conveyance he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 9 day of February 1960.

Frank P. Probst
Notary Public



*my commission expires
1/14/63
Filed - 2-10-60*