

4861

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Bernice Grace Jordon, Complainant

vs.

Myrl E. Jordon, 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 Bernice Grace Jordon is forever divorced from the said Myrl E. Jordon for and on account of Cruelty.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Respondent be and he is hereby awarded the care, custody and control of the three minor children, Joyce Jordon, Beverly Ann Jordon and Ricky Jordon, subject to the right of the Complainant to visit them at reasonable times and to have them visit her at reasonable times and for reasonable periods of time.

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 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 Myrl E. Jordon the Respondent pay the cost herein to be taxed, for which executed may issue.

This 29th day of February 1960

[Signature] 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

Bernice Grace Jordan

Complainant

vs.

Myrl E. Jordan

Respondent

DIVORCE DECREE

FILED

FEB 29 1950

ALICE J. DUCK, CLERK
REGISTER

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon MYRL E. JORDON to appear and plead, answer or demur within thirty days from the service hereof to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by BERNICE GRACE JORDON as Complainant and against Myrl E. Jordon, as Respondent.

Witness my hand this the 29 day of Feb, 1960.

Alice J. Duke
Register

BERNICE GRACE JORDON)	
)	IN THE CIRCUIT COURT OF
COMPLAINANT)	BALDWIN COUNTY, ALABAMA,
VS)	
)	IN EQUITY
MYRL E. JORDON)	
)	
RESPONDENT)	

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

Your Complainant, Bernice Grace Jordon, respectfully represents unto your Honor and this Honorable Court as follows:

1.

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

2.

That your Complainant and the Respondent were married at Pensacola, Florida, on February 21, 1944, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit: February 27, 1960.

3.

That on, to-wit, February 27, 1960, and on various occasions prior thereto, the Respondent cursed, 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.

4.

That there was born to the marriage between your Complainant and the Respondent three children, Joyce Jordon, age 15, Beverly Ann Jordon, age 13, and Ricky Jordon, age 11. That the Respondent is a fit and proper person to have their care, custody and control.

5.

That the Complainant and the Respondent did this day enter into a separation agreement and a copy is attached hereto and marked Exhibit "A" and made a part of this complaint as if herein fully set out.

WHEREFORE, the premises considered, the Complainant prays that Your Honor will by proper process make the said Myrl E. Jordon, party Respondent to this Bill of Complaint 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 prays that upon a final hearing your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; that your Respondent be awarded the care, custody and control of the minor children, Joyce Jordon, Beverly Ann Jordon, and Ricky Jordon; Your Complainant further prays that the attached separation agreement be made a part of the decree; Your Complainant prays for such, other, further, different or general relief as she may be in equity and good conscience entitled to receive.

FILED

FEB 29 1960

ALICE J. DUCK, Register

Wilters & Brantley

BY: 

Solicitors for the Complainant

4861

BERNICE GRACE JORDON

COMPLAINANT

VS

MYRL E. JORDON

RESPONDENT

BILL OF COMPLAINT

FILED

FEB 29 1960

ALICE J. DUCK, Register

STATE OF ALABAMA

BALDWIN COUNTY

This agreement made and entered into on this the 29th day of February, 1960, by and between Bernice Grace Jordon, hereinafter called Complainant, and Myrl E. Jordon, hereinafter called the Respondent, WITNESSETH:

WHEREAS the parties hereto have been husband and wife for a period of 16 years and as a result of such union have three children, Joyce Jordon, age 15, Beverly Ann Jordon, age 13, and Ricky Jordon, age 11.

WHEREAS said parties have definitely concluded that under conditions now existing it is impractical for them to live together as man and wife,

NOW, THEREFORE, in consideration thereof and the mutual agreements hereinafter made, they have mutually agreed to a complete separation under the expressed terms and conditions:

1. That the said parties have entirely and completely separated as man and wife living separate and apart, and neither party hereafter shall in any way harrass, threaten, intimidate or otherwise act in any way so as to embarrass or humiliate the other party.

2. The Respondent shall have the custody, control and care of the said children and that the Complainant shall have the right to visit and to have the said children visit her at reasonable times and for reasonable periods.

3. The Complainant agrees not to hold the Respondent liable for any alimony or support in return for the Respondent caring for the needs of the said children.

This agreement has been made and executed by the parties hereto on the day and date herein first above set forth in good faith with full understanding of all its provisions and with the mutual promise on the part of each to comply therewith faithfully and completely.

Bernice Grace Jordon
Myrl E. Jordon

WITNESSES

Henry J. Walters, Jr.
Edelyn Watts

FILED

FEB 29 1960

ALICE J. DUCK, Register

BERNICE GRACE JORDON
COMPLAINANT

VS

MYRL E. JORDON
RESPONDENT

SEPARATION AGREEMENT

FILED
FEB 29 1960
ALICE J. DUCK, Register

Bernice Grace Jordon

vs.

Myrl E. Jordon

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,
answer and waiver of respondent, separation agreement between complainant
and respondent, and testimony of Bernice Grace Jordon and Dan Cooley

and in behalf of Defendant upon answer and waiver

*Walters & Brantley
by Gary Walker
atty for complainant*

Alice J. ...

Register.

m

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Bernice Grace Jordan

VS.

Myrtle Jordan

Note of Testimony

Filed in Open Court this _____

day of _____, 19____

Register.

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Evelyn Watts

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 Bernice Grace Jordon and Dan Cooley

a witness in behalf of Complainant in a cause pending in our
Circuit Court in Baldwin County, of said State, wherein Bernice Grace Jordon is

, Complainant

and Myrl E. Jordon is

Respondent

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

Witness 29th day of February

, 19 60

Alice J. Duck
Register

Commissioner's Fee, \$

Witness' Fees, \$

NO. _____

STATE of ALABAMA
Baldwin County

CIRCUIT COURT

BERNICE GRACE JORDON

Complainant

vs.

MYRL E. JORDON

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Watts

WITNESSES:

Bernice Grace Jordan
Dan Cooley

THE STATE OF ALABAMA,
BALDWIN COUNTY

Circuit Court of Baldwin County, Alabama
(In Equity)

Bernice Grace Jordon COMPLAINANT

vs.

Myrl E. Jordon RESPONDENT

I, Evelyn Watts

as ~~Register and~~ Commissioner _____

have called and caused to come before me Bernice Grace Jordon and Dan Cooley

witness es named in the requirement for Oral Examination, on the 29 day of Feb.

19 60, at the office of Wilters & Brantley

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

truth, the whole truth, and nothing but the truth, the said Bernice Grace Jordon and Dan

Cooley doth depose and say as follows:

My name is Bernice Grace Jordon, and the Respondent's name is Myrl E. Jordon. The Respondent and I are over the age of 21 years and residents of Baldwin County, Alabama. We were married on February 21, 1944, in Pensacola, Florida, and have resided in Baldwin County, Alabama, since that time. As a result of our marriage the following children were born Joyce Jordon, age 15, Beverly Ann Jordon, age 13, and Ricky Jordon, age 11. The Respondent is a fit and proper person to care for these children and it is my desire that custody be given to him since I am unable to financially do so and my health at this time is not too good. On February 27, 1960, and on various occasions prior thereto the Respondent cursed, threatened and abused me and threatened to do actual violence to my person which would necessarily endanger my life and health and that his conduct was such as to give me every reasonable apprehension to believe and I do believe that if I continue to live with him He would do actual violence to my person which would necessarily endanger my life and health.

Bernice Jordon

My name is Dan Cooley and I have known the Complainant and Respondent all of their married life and I know that the last year ~~or~~ so they have had a lot of trouble getting along together and I think it would be to their best interest to be separated. They have three children and both of them are fit and proper persons to care for the children. I think it would be to the best interest of the children that they be separated from this family conflict and that Myrl can care for them better than Bernice.

Dan Cooley

ORAL EXAMINATION

I, Evelyn Watts 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 them and they signed the same in the presence of myself and Harry J. Wilters Jr.

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 29 day of February, 1960.

Evelyn Watts (L. S.)

No. _____	Page _____
THE STATE OF ALABAMA	
BALDWIN COUNTY	
IN CIRCUIT COURT, IN EQUITY	
Bernice Grace Jordan	
COMPLAINANT	
vs.	
Myrl E. Jordan	
RESPONDENT	
ORAL DEPOSITION	
FILED	
Filed <u>FEB 29 1960</u> , 19 <u> </u>	
Alice J. Duck, Register	
RECORDED IN _____	
Record _____	
Vol. _____	Page _____
_____, Register.	

BERNICE GRACE JORDON
COMPLAINANT

VS

MYRL E. JORDON
RESPONDENT

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

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, residences, marriage and children, but denies all other allegations therein contained 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 examined the Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Myrl E. Jordan

STATE OF ALABAMA
BALDWIN COUNTY

I, *Henry J. Walters Jr*, a Notary Public, in and for said County, in said State, hereby certify that Myrl E. Jordan, 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 said instrument, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 29th day of February, 1960.

FILED

FEB 29 1960

ALICE J. DUCK, Register

Henry J. Walters Jr
Notary Public, Baldwin County, Alabama

4861

BERNICE GRACE JORDON
COMPLAINANT

VB

MYRL E. JORDON

RESPONDENT

ANSWER AND WAIVER

FILED

FEB 29 1960

ALICE J. DUCK, Register