

4863

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARION JACKSON, Complainant

vs.

WILLIE JACKSON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree and Confession~~ 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

MARION JACKSON is forever divorced from the said WILLIE JACKSON for and on account of

Voluntary Abandonment - and the Complainant is hereby given the custody of the minor children born to this marriage.

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 MARION JACKSON the Complainant pay the cost herein to be taxed, for which executed may issue.

This 2nd day of March 1960

Robert M. Steel 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. 4863 Page _____

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

MARION JACKSON

Complainant

vs.

WILLIE JACKSON

Respondent

DIVORCE DECREE

*Filed 3-2-60
Alice Jackson
Registrar*

MARION JACKSON
COMPLAINANT

-VS-

WILLIE JACKSON
DEFENDANT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

BILL OF COMPLAINT

TO THE HONORABLE H. M. HALL, JUDGE OF THE CIRCUIT COURT:

Comes MARION JACKSON by this, her Bill of Complaint presented against WILLIE JACKSON and respectfully shows:

1. That both Complainant and Defendant are over the age of twenty-one, and is a bona fide resident of Baldwin County, Alabama, living in Daphne for more than three years next preceding the filing of this, her Bill of Complaint.

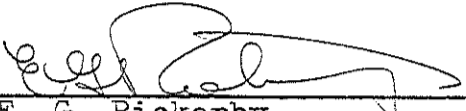
2. That your complainant and defendant were lawfully married in Jackson, Hinds County, Mississippi, on, to-wit, the 10th day of December, 1949, and lived together as husband and wife until about September, 1954, in Daphne, Baldwin County, Alabama, when the defendant, without just cause or legal excuse, voluntarily abandoned the complainant's bed and board.

3. That defendant voluntarily abandoned the bed and board of this complainant for more than one year next preceding the filing of this Bill of Complaint, since which time complainant and defendant have not lived together nor in any way recognized each other as husband and wife.

4. That to this marriage there has been born two children, Glenda Jackson, a girl, age five years, and Vernon Jackson, a boy, age seven years, and that it is to the best interest of said children to continue to live with their mother, this complainant.

THE PREMISES CONSIDERED, your complainant prays that the Court will make the said WILLIE JACKSON a party defendant to this cause by appropriate process, requiring him to plead, answer or demur within the time prescribed by law.

Complainant further prays that, upon a hearing of this cause, the court will award to her the custody of said minor children, and will render a decree forever divorcing her from the said defendant, allowing her to resume her maiden name, and granting her the right to remarry, should she so desire, and to have such other further or different relief as to equity may seem meet.


E. G. Rickarby
Solicitor for Complainant

FILED
MAR 2 1960
ALICE L. DUCK, CLERK
REGISTER

MARION JACKSON
COMPLAINANT

-VS-

WILLIE JACKSON
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY

ANSWER AND WAIVER

Comes the respondent, WILLIE JACKSON, in the above styled cause and for answer to the Bill of Complaint heretofore filed in said cause, and to each and every paragraph thereof, says:

He denies each and every allegation contained therein and demands strict proof thereof.

Respondent hereby submits himself to the jurisdiction of this Honorable Court and waives notice of the time and place for taking testimony in said cause, waives the issuance of a formal commissioner to take testimony in said cause and consents that testimony may be taken without further notice to him and further waives notice of the time and place of submission of said cause and consents that said cause may be submitted for final decree at any time or place without further notice to him of such submission.

Willie Jackson

WILLIE JACKSON, Respondent

STATE OF ALABAMA
BALDWIN COUNTY

I, the undersigned Notary Public, in and for said County in said State, hereby certify that WILLIE JACKSON, whose name is signed to the foregoing instrument and who is known to me to be the respondent above named, acknowledged before me on this day that he executed the same voluntarily with knowledge of its contents.

WITNESS my hand and official seal this the 15th day of February, 1960.

F. C. Murray

Notary Public, Baldwin County, Alabama

FILED

MAR 2 1960

ALICE J. DUCK, CLERK
REGISTER

Subscribed and sworn before me this 24th day of February, 1960.

Beverly Shepard
Commissioner

4863

MARION JACKSON,
Complainant,

- VS -

WILLIE JACKSON,
Respondent.

TESTIMONY

FILED
MAR 2 1960
ALICE J. DUCK, CLERK
REGISTER

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

MARION JACKSON,	¶	
Complainant,	¶	IN THE CIRCUIT COURT OF
- vs -	¶	BALDWIN COUNTY, ALABAMA,
WILLIE JACKSON,	¶	IN EQUITY.
Respondent.	¶	

TESTIMONY OF ELIZA JOHNN, a Witness on Behalf of Complainant:

ELIZA JOHNN, being duly sworn, testified as follows:

My name is ELIZA JOHNN and I am the mother of MARION JACKSON, who is filing suit for a divorce against her husband, Willie Jackson. Both, my daughter, Marion, and her husband, Willie Jackson, are over the age of twenty-one years and both live in Daphne, Alabama, and have been living there for the last three years. Of course, Willie, went to Detroit, Michigan, before the War, but he came back and he and my daughter were living here in Daphne, Baldwin County, Alabama, for the last three years, and are still living here.

My daughter married him in the latter part of 1949, and they lived together as husband and wife until about September, 1954, part of which time he was in the U. S. Army. In 1954 they were not getting along together too well. In September, 1954, he left her and they have been living separate and apart ever since then.

Since my daughter, MARION JACKSON, and her husband separated in 1954, she has been living at my home. Her husband, Willie Jackson, voluntarily abandoned her.

There have been two children born to this marriage, namely, Glenda Jackson, age, five, a girl, and Vernon Jackson, a boy, age, seven. My daughter, MARION JACKSON, is taking care of these two children and they are better off with her than they would be with her husband, who has not shown any interest in them.

I live in Daphne, Baldwin County, Alabama.

Eliza John
ELIZA JOHNN

Subscribed and sworn before me this 27th day of February, 1960.

Bensley Shepherd
Commissioner

4863

MARION JACKSON,

Complainant,

- VS -

WILLIE JACKSON,

Respondent.

TESTIMONY

FILED
MAR 2 1969
ALICE J. DUCK, CLERK
REGISTER

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

MARION JACKSON,
Complainant,
- VS -
WILLIE JACKSON,
Respondent.


Y
Y
Y
Y
Y

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

NOTE OF EVIDENCE

This cause is submitted for final decree on Complainant's Bill, Answer and Waiver filed by Respondent, and depositions of Complainant and ELIZA JOHNN.

FILED
MAR 2 1960
ALICE I. DUCK, CLERK
REGISTER


E. G. RICKARBY,
Solicitor for Complainant.



4863

MARION JACKSON,

Complainant,

-VS-

WILLIE JACKSON,

Respondent.

NOTE OF EVIDENCE

FILED
MAR 2 1880
ALICE J. DICK, CLERK
REGISTER

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