The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MAF	ION JACKSON	, Complainant
	vs.	
WII	LIE JACKSON	, Respondent
This cause coming on to be he	ard was submitted upon l	Bill of Complaint, DecreexProxXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX
	:	ony as noted by the Register, and upon con
	•	inant is entitled to the relief prayed for in
in the second se	•	urt that the bonds of matrimony heretofore same are hereby dissolved, and that the said
in A mar	ION JACKSON	is forever divorced from the
said WIL	LIE JACKSON	for and on account o
Voluntary Abandon	ment - and the C	omplainant is hereby
given the custody o		-
days, neither party shall again marry It is futher ordered that the C again contract marriage upon payment It is futher ordered that	except to each other during the cost of the cost of this suit. MARTON JACI	nt be, and they are hereby permitted to
	and the production of the control of	
I,	Court of Baldwin Coun foregoing is a correct co Judge of the Circuit Co decree is on file and en	
		d and seal this theday
	of	, 19
4	-	Register of Circuit Court, In Equity.

No. 44603

Page

THE STATE OF ALABAMA
BALDWIN COUNTY

In Circuit Court, In Equity

MARION JACKSON

Complainant

vs.

WILLIE JACKSON

Respondent

DIVORCE DECREE

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THE PROPERTY OF A PROPERTY OF

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.

147

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.

MAR 2 1960
ALCE J. DUN, SLEEK

E. G. Rickarby
Solicitor for Complainant

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Complainant,

_ VS _

WILLIE JACKSON,

Respondent.

BILL OF COMPLAINT

MAR 2 1960
L. MIK CLERK
REGISTED

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA,

IN EQUITY.

MARION JACKSON,

Complainant,

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

WILLIE JACKSON,

Respondent.

COMMISSIONER'S STATEMENT

I, Beverley Shepherd , Commissioner acting under stipulation of the parties in the divorce suit of MARION JACKSON vs. WILLIE JACKSON, pending in the Equity side of the Circuit Court of Baldwin County, Alabama, hereby certify that I have caused the witnesses in this cause, namely, MARION JACKSON and ELIZA JOHNN, who were made known to me and known to be the identical witnesses called by the parties to come to my office in the old bank building at 392 Fairhope Avenue, in the City of Fairhope, Baldwin County, Alabama, where said witnesses after being first duly sworn by me, upon examination of E. G. Rickarby, Solicitor for the Complainant, did testify as shown by the attached testimony, that their testmony was by me reduced to writing as given by them as near as might be in their identical language and, after being reduced to writing, was read over by the said witnesses who assented to and signed the same in my presence.

I further certify that I am not of counsel or kin to either of the parties to this cause, nor anywise interested in the results thereof.

IN WITNESS WHEREOF, I hereunto set my hand as Commissioner on this the $27^{\frac{\pi}{2}}$ day of February, 1960.

Benules Sheplud
Commissioner

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, Respondent

STATE OF ALABAMA

BALDWIN COUNTY

I, the undersigned Notary Public, in and for said County in sais 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.

day of WITNESS my hand and official seal this the

Notary Public, Baldwin County, Alabama

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ALICE & DUCK, CLERK

Complainant,

-VS_

WILLIE JACKSON,

Respondent.

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IN THE CIRCUIT COURT OF

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"N EQUITY

MARION JACKSON	()	IN THE CIRCUIT COURT OF
Complainant	()	BALDWIN COUNTY, ALABAMA
-VS-	()	IN EQUITY
	()	
WILLIE JACKSON	()	
Respondent	()	

TESTIMONY OF MARION JACKSON, COMPLAINANT

My name is Marion Jackson and I am bringing this suit for a divorce against my husband, Willie Jackson. Both he and I are over the age of twenty-one years and live here in Baldwin County, Alabama. We have been living here for the last three years and both of us now live here in Baldwin County, Alabama.

My husband, Willie Jackson, and I were married in Jackson, Mississippi, which is in Hines County, on the 10th day of December, 1949. We came back to Baldwin County, and lived in Daphne together until September, 1954.

I had been a good wife to him. In 1952, he went away to the Army and came back in 1954. When he came back in 1954, we just did not seem to be able to get along and he left me. Since September, 1954, we have lived separate and apart and have had nothing to do with each other since that time.

While we were married we had two children. My oldest child is a boy, Vernon Jackson, age seven, and I have a little girl, Glenda Jackson, age five. Both of these children have been living with me and I am supporting them. They want to live with me and do not want to live with Willie Jackson, their Father. He has done nothing toward supporting them and I am asking for a divorce and feel that it would be the best interest of the children that they be under my care and custody.

I am asking the court to give me those children and give me my divorce.

MARION JACKSON

E. G. Rickarby Attorney for Complainant

Subscribed and sworn before me this 34th day of February, 1960.

Complainant,

_ VS ...

WILLIE JACKSON,

Respondent.

TESTIMONY



IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,

IN EQUITY.

MARION JACKSON,	<u> </u>	
Complainant,	¥	IN THE CIRCUIT COURT OF
- VS	I	BALDWIN COUNTY, ALABAMA,
WILLIE JACKSON,	Ĭ	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, be
fore 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.

Clara Johnn (ELIZA JOHNN

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

Benuly Shepherd Commissioner

Complainant,

VS -

WILLIE JACKSON,

Respondent.

TESTIMONY



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

MARION JACKSON,	X	
Complainant,	Ž	IN THE CIRCUIT COURT OF
_ VS _	Ž	BALDWIN COUNTY, ALABAMA,
WILLIE JACKSON,	ğ	IN EQUITY.
Respondent.	Ĭ	

NOTE OF EVIDENCE

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

FILED MAR 2 1960 UCE J. DUCK, CLERE REGISTER

E. G. RICKARBY, Solicitor for Complainant.

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MARION JACKSON,

Complainant,

VS

WILLIE JACKSON,

Respondent.

NOTE OF EVIDENCE

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