

4876

DIVORCE DECREE

MOORE PRINTING COMPANY - BAY MINETTE, ALA.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

HELEN G. JAY, Complainant

vs.

JACK D. JAY, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ 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 Helen G. Jay is forever divorced from the said Jack D. Jay for and on account of

Habitual Drunkenness

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 Jack D. Jay the Defendant pay the cost herein to be taxed, for which executed may issue.

This 21st day of March 1960.

Robert M. [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 \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_

Register of Circuit Court, In Equity.

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No. 4874 Page \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

In Circuit Court, In Equity

Complainant

vs.

Respondent

**DIVORCE DECREE**

**FILED**

MAR 21 1961

ALICE D. DUCK, CLERK  
REGISTER

HELEN G. JAY, Complainant,	)	IN THE CIRCUIT COURT OF
	)	
vs	)	BALDWIN COUNTY, ALABAMA
	)	
JACK D. JAY, Defendant.	)	IN EQUITY

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

Comes your Complainant, Helen G. Jay, and humbly complaining against Jack D. Jay, and respectfully shows unto your Honor:

FIRST: That your Complainant is over the age of twenty one years and is a resident of the Town of Silverhill, Baldwin County, Alabama, where she has resided all of her life.

SECOND: That the said Defendant is over the age of twenty one years and is a resident of Baldwin County, Alabama.

THIRD: That your Complainant and the Defendant were married in the Town of Robertsedale, Baldwin County, Alabama, on to-wit: the 22nd day of August, 1953.

FOURTH: That subsequent to the said marriage the said Defendant has become addicted to habitual drunkenness, which said habit continues down to the filing of this bill of complaint, and because of the continued existence of this habit your Complainant can no longer live with the said Defendant.

WHEREFORE, your Complainant prays that this Honorable Court will take jurisdiction of the cause made by this bill of complaint and make the said Jack D. Jay party Defendant hereto and by appropriate process require him to plead, answer or demur to the same within the time and under the pains and penalties prescribed by law and the practice of this Honorable Court.

Complainant further prays that upon the final hearing of this cause this Honorable Court will make and enter an order and decree forever dissolving the bonds of matrimony between this Complainant and the said Defendant, and that the said Complainant prays for such other, further or different relief as she shall in equity and good conscience be entitled to in the premises.

FILED

MAR 21 1961

ALICE J. DUCK, CLERK  
REGISTER

John P. Beebe  
Solicitor for Complainant

HELEN G. JAY,  
Complainant,

vs

JACK D. JAY,  
Defendant.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

Comes Jack D. Jay, the Defendant in the above styled cause and answering the Complainant's complaint and every allegation therein made says the same are untrue, and the said Defendant demands strict proof thereof.

The said Defendant waives notice of the application to take testimony, notice of the time and place of taking testimony, the right to cross examine Complainant's witnesses, notice of the submission of the cause for final decree and agrees and consents that the said cause be submitted for final decree upon motion of complainant or her attorney of record.

Witness my hand, this the 18<sup>th</sup> day of March, 1960.

Jack D. Jay  
Defendant

Witnesses:

John P. Beebe  
\_\_\_\_\_

FILED

MAR 21 1961

ALICE J. DUCK, CLERK  
REGISTER

Helen G. Jay,

Complainant,

vs.

Jack D. Jay,

Defendant.

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,  
Testimony of Complainant before Commissioner

and in behalf of Defendant upon Answer and Waiver

John P. Beebe

*Wm. J. ...*  
Register.

*me*

No. 4876

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

VS.

**Note of Testimony**

Filed in Open Court this \_\_\_\_\_

**FILED**

day of \_\_\_\_\_, 19

MAR 21 1900

**ALICE J. DUCK, CLERK**  
**REGISTER**

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA  
Baldwin County

Circuit Court

TO: Martha C. Harrell

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

Helen G. Jay

a witness in behalf of Complainant  
Circuit Court in Baldwin County, of said State, wherein  
Helen G. Jay

in a cause pending in our

, Complainant

and Jack D. Jay

Respondent

on oath, to be by you administered, upon Helen G. Jay  
to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness 28 day of March

, 1960.

*Deice J. ...*  
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 4876

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

VS. Complainant

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

FILED

WITNESSES: MAR 18 1961

ALICE J. DUCK, CLERK  
REGISTER

The State of Alabama, {  
Baldwin County

CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA

In Equity.

----- Helen G. Jay, -----

Complainant,

-----

Complainant-----

VS.

----- Jack D. Jay, -----

-----

Defendant-----

The ----- Solicitor for Complainant -----

requests the oral examination of the following named witnesses, on behalf of the Complainant, -----

Helen G. Jay

----- - viz:

Helen G. Jay

-----

-----

said witnesses reside in the County of ----- Baldwin -----

State of Alabama.

----- Martha C. Harrell -----

who resides at

----- Robertsdale, Alabama. -----

----- ~~by the Register of this Court~~ is suggested as a suitable person  
to be appointed Commissioner to take the deposition of said witness on such oral examination.

*John P. Beebe*

Solicitor for ----- Complainant -----

4876

CIRCUIT COURT OF  
Baldwin County, Alabama

IN EQUITY

Complainant..

vs.

Defendant..

DEMAND FOR ORAL EXAMINATION

Filed.....19

MAR 28 1961 Register.

ALICE J. DUCK, CLERK REGISTER

The State of Alabama, BALDWIN County

CIRCUIT COURT, IN EQUITY

HELEN G. JAY Complainant

vs.

JACK D. JAY Defendant

Deposition of Helen G. Jay, the Complainant,

By virtue of the appointment to take the Deposition, indorsed in writing, on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County, I,

Mrs. Martha Harrell, Commissioner appointed by Register of said Court of said County, have called and caused to come before me

Helen G. Jay

the witness named in the Interrogatories and having first sworn the said witness to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

My name is Helen G. Jay. I am the complainant in the above entitled cause. I married Jack D. Jay on the 22nd day of August, 1953, in the Town of Robertsdale, Baldwin County, Alabama. I am 28 years of age. the Defendant Jack D. Jay is also 28 years of age. We have no children born to us. After we married we lived in Silverhill, Baldwin County, Alabama, and still live there. When we first married the defendant did not drink, but soon thereafter he began coming home in a drunken condition and that has keep up practically all the time we have been married and for the past several months he stays drunk and is out all hours of the night and when he does come home he is in a completely drunken condition. He is in my opinion a habitual drunkard and because of his drinking it is impossible for me to live with him.

Helen G. Jay
Helen G. Jay

The State of Alabama

Baldwin COUNTY.

IN CIRCUIT COURT, IN EQUITY

Helen G. Jay  
Complainant

vs. Complainant,

Jack D. Jay,

Defendant.

~~Deposition Taken Before Register on Interrogatories~~

**FILED**

Deposition of.....

MAR 21 1961

for.....

ALICE J. DUCK, CLERK  
REGISTER

Filed..... day of....., 19.....

Published by order of the Court.....

....., 19.....

Register.

968h