

(2919)

The State of Alabama, Baldwin County
CIRCUIT COURT, IN EQUITY

Sue Cole, Complainant
vs.
Charlie Cole, 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 Sue Cole is forever divorced from the said Charlie Cole for and on account of Cruelty

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 the payment of the cost of this suit.

It is further ordered that Sue Cole the Complainant pay the cost herein to be taxed, for which execution may issue.

This 17th day of November, 1952.

J. Fair J. Marlborough
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. 2919 Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

Sue Cole

Complainant

vs.

Charlie Cole

Respondent

DIVORCE DECREE

FILED

NOV 17 1952

ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons CHARLIE COLE, 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 SUE COLE, as Complainant, and against Charlie Cole, as Respondent.

WITNESS my hand this the _____ day of November, 1952.

Register

SUE COLE
COMPLAINANT
VS
CHARLIE COLE
RESPONDENT

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

TO HONORABLE TELFAIR J. MASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant, Sue Cole, respectfully represents unto Your Honor and this Honorable Court as follows:

1.

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

2.


That your Complainant and the Respondent married at Pascagoula, Mississippi, on September 21, 1951, and lived together as husband and wife in Baldwin County, Alabama, until on to-wit October 15, 1951.

3.

That on to-wit, October 15, 1951, 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.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper process make the said Charlie Cole, 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 further prays that upon a final hearing hereof your Honor will enter a decree forever barring the bonds of matrimony existing between your Complainant and the Respondent; Your Complainant prays for such, other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

NO 2 RECORDED

SUE COLE

COMPLAINANT

VS

CHARLIE COLE,

RESPONDENT

BILL OF COMPLAINT

FILED

NOV 12 1952

ALICE J. DUCK, Register

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Sue Cole Complainant

VS.

Charlie Cole Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Sue Cole

witness named in the Requirement for Oral Examination, on the 10 day of November
194 52, at the office of Hubert M. Hall
in Bay Minette, Alabama, and having first sworn said Witness to speak the
truth, the whole truth, and nothing but the truth, the said Sue Cole
doth depose and say as follows:

My name is Sue Cole. I am a resident of Spanish Fort, Baldwin County, Alabama, and over twenty-one years of age.

The Respondent Charlie Cole, is a resident of Doxley in Baldwin County, Alabama, and over twenty-one years of age.

The Respondent and I married at Pascagoula, Mississippi, on September 21, 1951. We lived together only a short time until the Respondent began to curse, threaten and abuse me. His conduct toward me was such as to render it absolutely impossible for me to live with him. The conduct of the Respondent was such as to give me every reasonable apprehension to believe and I did actually believe that if I continued to live with him he would carry out his threats and do actual violence to my person which would necessarily endanger my life and health. While I am not positive it is my opinion that the Respondent was from time to time armed and threatened me in such a manner that I felt that my life was in danger. The Respondent and I have reached a full and complete agreement and settlement as to any claims that I might have against the Respondent as alimony, property settlement or otherwise. We, of course, have no children.

I know that it is absolutely impossible for the Respondent and me to ever lived together as husband and wife. He is about 62 years old and I am over 50 years of age.

Sue Cole

ORAL EXAMINATION.

I, Evelyn Watts, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness _____ and read over to her and she signed the same in the presence of myself Hubert M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness _____ or had proom 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 10 day of November, 194 52

Evelyn Watts (L. S.)

NO. 2919 PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Sue Cole

vs. Charlie Cole
Complainant

Respondent.

Oral Deposition

Filed _____, 194 _____

Register.

FILED
NOV 13 1952

Record

Vol. 187, 1 Page _____

Register.

SUE COLE
COMPLAINANT
VS
CHARLIE COLE
RESPONDENT

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

Now comes the Respondent, Charlie Cole, and accepts service of the summons and complaint in this cause.

The Respondent admits the allegations as to ages, residences and marriage but denies all allegations as to cruelty 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.

Witnesses to the affiant's signature

Lora A. Gammus
Lewis J. Clements

Charlie Cole
mark

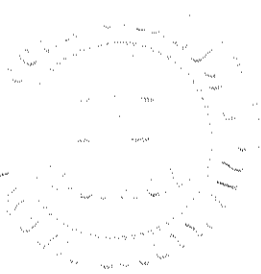
STATE OF ALABAMA
BALDWIN COUNTY

I, John J. Gammus, a Notary Public, in and for said County, in said State, hereby certify that Charlie Cole, 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 said conveyance, he executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 8th day of November, 1952.

John J. Gammus
Notary Public, Baldwin County, Ala.

My term expires on Monday after the second Tuesday in January, 1955.



RECORDED

NO 2919

SUE COLE

COMPLAINANT

VS :

CHARLIE COLE

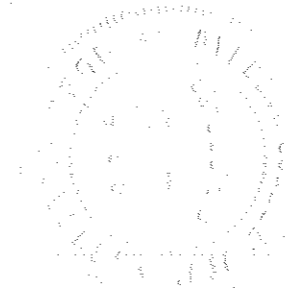
RESPONDENT

ANSWER AND WAIVER

FILED

NOV 12 1952

ALICE J. DUCK, Register



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, at such time and place as you may appoint, to call before you and examine Sue Cole

as witnesses in behalf of Complainant in a cause pending in our Circuit Court in Baldwin County, of said State, wherein Sue Cole

_____ , Complainant

and Charlie Cole

_____ Respondent

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

Witness 10th day of Nov, 1952

David J. Bennett
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Sue Cole

Complainant—

vs.

Charlie Cole

Defendant—

COMMISSION TO TAKE DEPOSITION

COMMISSIONER

Evelyn Watts

WITNESSES:

Sue Cole

NOV 22 1952

ALICE J. DUCK, Registrar

Sue Cole

Charlie Cole

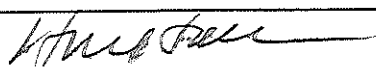
vs.

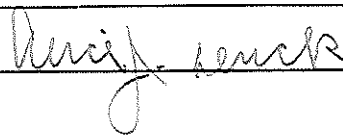
THE STATE OF ALABAMA
Baldwin County

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 and testimony of Sue Cole

and in behalf of Defendant upon _____


Solicitor


Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Sue Cole

vs.

Charlie Cole

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194.....

FILED
NOV 12 1952

Register.

ALICE J. DUCK

Printed By Baldwin Times

6162

6920

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

ADA FORSTER, Complainant

vs.

FREDERICK FORSTER, 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 ADA FORSTER is forever divorced from the said FREDERICK FORSTER for and on account of Complainant living separate and apart from the bed and board of Respondent for more than two years next prior to the filing of the bill of complaint without support from Respondent.

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 the payment of the cost of this suit.

It is further ordered that ADA FORSTER the Complainant pay the cost herein to be taxed, for which execution may issue.

This 17th day of November, 1952.

J. J. Markberry, Jr. 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. 2920 Page _____

The State of Alabama
Baldwin County

In Circuit Court, In Equity

ADA FORSTER

Complainant

vs.

FREDERICK FORSTER

Respondent

DIVORCE DECREE

FILED

NOV 17 1952

ALICE J. DUCK, Register