

(2921)

DIVORCE DECREE

Printed by Moore Ptg. Co.

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

GEORGE BROWN, JR., Complainant

vs.

LUCY MAE BROWN, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confessione~~ Answer & 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 George Brown, Jr. is forever divorced from the said Lucy Mae Brown for and on account of Adultery

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 George Brown, Jr. the Complainant pay the cost herein to be taxed, for which execution may issue.

This 18th day of November, 1952.

J. J. [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

GEORGE BROWN, JR

Complainant

vs.

LUCY MAE BROWN

Respondent

DIVORCE DECREE

FILED
NOV 19 1952

ALICE J. DUCK, Register

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon LUCY MAE BROWN 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 GEORGE BROWN, JR., as Complainant and against LUCY MAE BROWN, as Respondent.

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

Register

GEORGE BROWN, JR	Ø	IN THE CIRCUIT COURT OF
COMPLAINANT	Ø	BALDWIN COUNTY, ALABAMA
VS	Ø	IN EQUITY.
LUCY MAE BROWN	Ø	
RESPONDENT	Ø	

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

Your Complainant, George Brown, Jr., respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant and the Respondent were both bona fide residents of Baldwin County, Alabama, at the time of their separation and more than two years prior thereto; that Complainant is a resident of Baldwin County, but that the Respondent is now residing in Mobile County, Alabama; that the Complainant is over the age of twenty-one and the Respondent is over the age of twenty-one.

2.

That your Complainant and the Respondent married at Bay Minette, Alabama, on May 3, 1946, and lived together as husband and wife until on, to-wit: June 27, 1952.

3.

Your Complainant further avers and alleges that said Respondent has been guilty of adultery with divers parties and persons whose names to your Complainant are unknown.


4.

There are no children as fruits of this marriage, and there is no property to be divided.

WHEREFORE, the premises considered, your Complainant prays that your

Honor will by proper procedure make the said Lucy Mae Jones Brown, party Respondent to this bill of complaint requiring her 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 hearing hereof, your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Your Complainant prays for such other, further, different or general relief as he may be in equity and good conscience entitled to receive.


Solicitor for the Complainant.

70292-1

GEORGE BROWN, JR

COMPLAINANT

VS

LUCY MAE JONES BROWN

RESPONDENT

Bill of Complaint

From the Law Offices of
C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama

FILED

NOV 17 1952

ALICE J. DUCK, Register

GEORGE BROWN, JR.

vs.

LUCY MAE BROWN

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, _____

Answer & Waiver of Respondent, Testimony by George Brown, Jr., and George

A. Ankum.

and in behalf of Defendant upon _____

E. Lewis Thompson

Wesley Welch

Register.

No.

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

GEORGE BROWN, JR

vs.

LUCY MAE BROWN

NOTE OF TESTIMONY

Filed in Open Court this

day of, 194.....

FILED

NOV 17 1952

Register.

Printed By The Baldwin Times

GEORGE BROWN *fr*
COMPLAINANT
VS
LUCY MAE BROWN
RESPONDENT

Ø
Ø
Ø
Ø
Ø

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

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

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demand strict proof of the same.

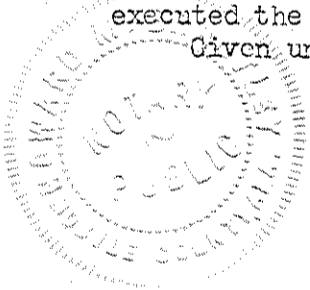
The Respondent waives notice of the time of taking of testimony on behalf of the Complainant; the right to cross-examine Complainant's witnesses; and agrees that this cause be submitted for final decree without further notice.

Lucy Mae Brown

STATE OF ALABAMA
COUNTY OF

I, Howard M. Bradley, a Notary Public, in and for said County, in said State, hereby certify that Lucy Mae Brown, 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 the conveyance, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 1 day of Nov., 1952.



Howard M. Bradley
Notary Public, Mohr County, Alabama.

My commission expires March 18th 1956

GEORGE BROWN *JB*
COMPLAINANT
VS
LUCY MAE BROWN
RESPONDENT

Ø
Ø
Ø
Ø
Ø

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

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

The Respondent admits the allegations as to ages, marriage and residence, but denies all other allegations contained in the bill of complaint, and demand 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.

Lucy Mae Brown

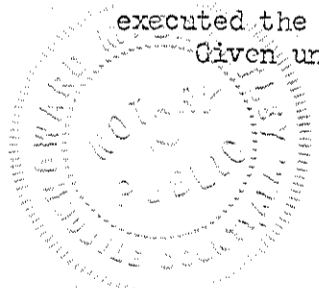
STATE OF ALABAMA
COUNTY OF

I, Howard M. Bradley, a Notary Public, in and for said County, in said State, hereby certify that Lucy Mae Brown, 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 the conveyance, she executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 1 day of Nov., 1952.

Howard M. Bradley
Notary Public, Mobile County, Alabama.

My commission expires March 18th 1956



GEORGE BROWN, JR

COMPLAINANT

VS

LUCY MAE JONES BROWN

RESPONDENT

Answer & Waiver

From the Law Offices of
C. LeNoir Thompson
Attorney At Law
Bay Minette, Alabama



FILED
NOV 17 1952
ALICE J. DUCK, Register

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Lyrleene Nixon

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 George Brown, Jr., and George A. Ankum

as witnesses in behalf of George Brown, Jr in a cause pending in our Circuit Court in Baldwin County, of said State, wherein

George Brown, Jr

Complainant

and

Lucy Mae Brown

Respondent

on oath, to be by you administered, upon George Brown, Jr., and George A. Ankum

to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 8th day of Nov, 1942

Wiest Hench
Register.

Commissioner's Fee, \$ _____

Witness' Fees, \$ _____

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

GEORGE BROWN, JR

Complainant

VS.

LUCY MAE BROWN

Respondent

I, Ivrlene Nixon

as Register and Commissioner

have called and caused to come before me George Brown, Jr., and George A. Ankum

witnesses named in the Requirement for Oral Examination, on the 8th day of November
1945, at the office of C. LeNoir Thompson
in Bay Minette, Alabama, and having first sworn said Witnesses to speak the
truth, the whole truth, and nothing but the truth, the said George Brown, Jr., and George
A. Ankum doth depose and say as follows:

That my name is George Brown, Jr., I am over the age of 21, and a resident of Baldwin County, Alabama, and have been more than two years next preceding. The complainant is over the age of 21, and was a resident of Baldwin County when we were married and during our marriage life, after our separation she has gone to Mobile County. We were married in Bay Minette, Alabama, on May 3, 1946, and lived together as husband and wife until June 27, 1952, at which time she left me and went and is living with Henry Smith in adultery, there are no children as fruits of this marriage and no property to be divided. I know that I can not live with her again as her husband.

George Brown, Jr.

That my name is George A. Ankum, I know both parties to this cause that they are both over the age of 21, and residents of Baldwin County, Alabama, and have been for more than two years next preceding, They were married in Bay Minette in May, 1946, and lived together in Baldwin County as husband and wife until about June 27, 1952, when Lucy Mae took up with Henry Smith and left home and went to Mobile County to live with Henry Smith, there are no children as fruits of this marriage.

George A. Ankum

2921

ORAL EXAMINATION.

I, Lyrleene Miron, 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 ES and read over to them and they signed the same in the presence of myself and C. LeNoir Thompson

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom 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 8th day of November, 1952

Lyrleene Miron (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

GEORGE BROWN, JR

vs. Complainant

LUCY MAE BROWN

Respondent.

Oral Deposition

Filed **FILED**, 1952
Register.

NOV 17 1952
Recorded in

ALICE J. DICK, Register
Record

Vol. _____ Page _____
Register.