

2426

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

Earl M. Long, Complainant

vs.

Helen A. Long, Respondent

This cause coming on to be heard was submitted upon <sup>amended</sup> Bill of Complaint, ~~Decree Pro Confesso~~ on Respondent's 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 Earl M. Long is forever divorced from the said Helen A. Long for and on account of Voluntary Abandonment

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 Earl M. Long the Complainant pay the cost herein to be taxed, for which execution may issue.

This 30th day of March, 1953

Hubert M. Zeller Judge Circuit Court, In Equity.

I, Alice J. Duck, 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

Earl M. Long

Complainant

vs.

Helen A. Long

Respondent

**DIVORCE DECREE**

Arthur C. Epperson  
Attorney at Law  
Foley, Ala.

EARL M. LONG )  
Complainant )  
Vs. )  
HELEN A. LONG )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY ALABAMA  
IN EQUITY

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY,  
SITTING IN EQUITY:

Now comes Respondent Helen A. Long and for answer  
respectfully shows to the Court as follows, to-wit:

Respondent denies generally, each and every, all and  
singular, the allegations contained in Complainant's petition  
and demands strict proof thereof, for which she puts herself  
upon the country.

WHEREFORE, premises considered, respondent prays that  
complainant take nothing by reason of this suit.

Helen A. Long

Earl M. Long

vs.

Helen A. Long

THE STATE OF ALABAMA  
 Baldwin County  
 IN EQUITY  
 Circuit Court of Baldwin County

This cause is submitted in behalf of <sup>amended</sup> Complaint upon the original Bill of Complaint, \_\_\_\_\_  
 Respondent's Answer and Waiver, Commission to take depositions,  
 Oral Depositions of the Complainants witnesses

and in behalf of Defendant upon \_\_\_\_\_

*Wesley J. ...*  
 Register

*Arthur E. ...*  
 Attorney for Complainant Register.

No. \_\_\_\_\_

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

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

Earl M. Long

vs.

Helen A. Long

**NOTE OF TESTIMONY**

Filed in Open Court this 28th.....

day of March, 1943

Alice J. Ruck  
Register.

Printed By The Baldwin Times

Arthur C. Epperson  
Attorney at Law  
Foley, Ala.

EARL M. LONG  
Complainant

Vs.

HELEN A. LONG  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY ALABAMA  
IN EQUITY

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, SITTING IN  
EQUITY:

Now comes Respondent Helen A. Long and for answer respectfully  
shows to the Court as follows, to-wit:

Respondent denies generally, each and every, all and singular,  
the allegations contained in Complainant's petition and demands strict  
proof thereof, for which she puts herself upon the country.

WHEREFORE, premises considered, respondent prays that com-  
plainant take nothing by reason of this suit.

Helen A. Long



THE STATE OF ALABAMA  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

EARL M. LONG

Complainant

VS.

HELEN E. LONG

Respondent

I, Dixie A. Petersen

as Register and Commissioner

have called and caused to come before me Earl M. Long and Bessie Long

witnesses named in the Requirement for Oral Examination, on the 28 day of March 1945, at the office of Dixie Peterson in Foley, Alabama, and having first sworn said Witnesses to speak the truth, the whole truth, and nothing but the truth, the said Earl M. Long and Bessie Long doth depose and say as follows:

My name is Earl M. Long, I am over the age of twenty-one years and am and have been a bona-fide resident of Baldwin County, Alabama for more than ten years next preceding the filing of this bill of complaint. Helen A. Long is over the age of twenty-one years and is a resident of the State of Texas. She and I were married at Iowa Park, Texas July 1, 1949. We do not have any children.

In August of 1951, I got out of service and we came to Foley to live. She did not like Foley very much and in September of 1951, she went back to Texas to live. Since that time we have not lived together or in any way recognized each other as husband or wife. She left me voluntarily and without fault on my part.

Earl M Long

My name is Bessie Long. Earl M. Long is my son. I have lived in Foley for over ten years.

My son and his wife Helen came home to live with me in August of 1951. She did not seem to like living in a small town or Alabama very much. She stayed nearly a month then said she was going to go back to her home. She didn't say she was going to stay but she took everything she had with her. Later she wrote Earl and said she wasn't coming back. They haven't lived together since then.

Mrs Bessie Long



ORAL EXAMINATION.

I, Dixie A. Peterson, 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 ess and read over to them and they signed the same in the presence of myself Dixie A. Peterson

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ess 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 28 day of March, 1953

Dixie A. Peterson (L. S.)

NO. \_\_\_\_\_ PAGE \_\_\_\_\_

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Earl M. Long

vs. Complainant

Helena A. Long

Respondent.

Oral Deposition

Filed 3-28, 1953

Archie L. ..., Register.  
Recorded in \_\_\_\_\_

Vol. \_\_\_\_\_ Page \_\_\_\_\_  
Record \_\_\_\_\_

Register.

Arthur C. Peterson  
Attorney at Law  
Foley, Ala.

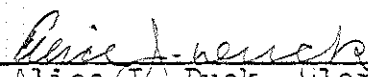
EARL M. LONG )  
Complainant )  
Vs. )  
HELEN A. LONG )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Personally appeared beforeme, Alice J. Duck, Clerk of the Circuit Court of Baldwin County, Alabama, Arthur C. Epperson, Solicitor of Record for complainant in the above entitled cause, who being duly sworn, deposes and says that - he is informed and verily believes the Helen M. Long, the respondent in the above styled cause, is a nonresident of Alabama, and whose residence and post office address is: 1436 Elney Street, Ft. Worth, Texas, and that the said respondent is in the belief of the affiant over twenty-one Years of age.

  
Affiant

Sworn to and subscribed before me, this the nineteenth day of November, 1952.

  
Alice J. Duck, Clerk of the  
Circuit Court  
Baldwin County, Alabama

2924

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

\* \* \* \* \*

EARL M. LONG  
Complainant

Vs.

HELEN M. LONG  
Respondent

\*\*\*\*\*

AFFIDAVIT OF NONRESIDENCE  
OF RESPONDENT

\*\*\*\*\*

FILED  
NOV 19 1952  
ARTHUR C. EPPERSON, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

EARL M. LONG  
Complainant

VS.

HELEN A. LONG  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

Comes the respondent, Helen A. Long, and for answer to the bill of complaint as amended herein says as follows:

1. She denies each and every material allegation contained in said bill of complaint and demands strict proof of the same.

2. The respondent hereby waives notice of the taking of testimony in this cause, notice of submitting said cause for final decree, and such other, further or different relief to which she might otherwise be entitled.

Helen A. Long  
RESPONDENT

B. Lewis in Leg

James B. Whisler

RECORDED

STATE OF ALABAMA  
BALDWIN COUNTY

\*\*\*\*\*

IN THE CIRCUIT COURT, IN EQUITY

\*\*\*\*\*

EARL M. LONG  
Complainant

Vs.

Helen A. LONG  
Respondent

\*\*\*\*\*

Answer and Waiver to amended  
Bill of complaint

\*\*\*\*\*

FILED

3-28-53

ALICE J. DUCK, Clerk

EARL M. LONG  
Complainant  
VS.  
HELEN A. LONG  
Respondent

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

To the Honorable Judge of the Circuit Court of Baldwin County,  
Alabama, Sitting in Equity:

Your Complainant, Earl M. Long, files this his amended bill  
of complaint, so as to read as follows:

1. That your Complainant is over the age of Twenty-one years  
and is a resident of said County and State, and has been a bone-fide  
resident of said State for more than two years next preceding the  
filing of this bill of complaint; that Helen A. Long, the respondent,  
is a resident of the State of Texas and is over the age of twenty-one  
years.

2. That the complainant and respondent were lawfully married  
at Iowa Park, Texas, on or about to-wit: July 1, 1949; and further  
that of this marriage there are no children.

3. Complainant further avers that the said respondent voluntarily  
abandoned the bed and board of complainant for more than one year next  
preceding the filing of this bill of complaint, since which time the  
complainant and respondent have not lived together nor in anywise recog-  
nized each other as husband or wife.

The premises considered, your complainant makes the said Helen  
A. Long a party respondent to this amended bill of complaint; and in  
order that the complainant may have the relief herein prayed for, may  
it please your Honor to cause the States's Writ of subpoena to be iss-  
ued, directed to the said Helen A. Long, commanding her to answer, plead  
or demur to this bill of emmended bill of complaint, within the time  
required by law; and that on a final hearing of this cause, that your  
Honor will enter a decree divorcing your complainant from the respond-  
ent; granting the respondent the right to resume her maiden name; and  
granting the complainant such other, further and different relief as  
unto your Honor may seem just and proper, and your complainant will  
ever pray.

Resp. add.  
1436 Edney Street  
Ft. Worth Texas.

  
Solicitor for Complainant

292 / RECORDED

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

\*\*\*\*\*

EARL M. LONG  
Complainant

VS.

HELEN A. LONG  
Respondent

\*\*\*\*\*

AMENDED BILL OF COMPLAINT

\*\*\*\*\*

FILED  
DEC 30 1952  
ALICE I. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

The State of Alabama, Madison County

IN CIRCUIT COURT, IN EQUITY

To any Sheriff of the State of Alabama—Greeting:

You are hereby commanded to summon

Nelson B. Long

to appear and answer, plead, or demur, within thirty days from the service hereof, to a Bill of Complaint filed in said Circuit Court, in equity, for said County of said State.

Earl M. Long

against

Nelson B. Long

Herein fail not. Due return make of this writ as the law directs.

Witness this 19<sup>th</sup> day of Nov, 1954

Register.

(Defendant is entitled to a copy of the bill on application to the Register.)



EARL M. LONG )  
Complainant )  
Vs. )  
HELEN A. LONG )  
Respondent )

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

TO the Honorable Judge of the Circuit Court of Baldwin County,  
Sitting in Equity:

Your Complainant Earl M. Long, respectfully represents and shows  
unto your Honor:

1. That Your Complainant is over the age of twenty-one years and  
is a resident of said state and county, and has been a bona-fide res-  
ident of said State more than two years next preceding the filing of  
this bill of complaint; that Helen A. Long, the respondent is a resident  
of the State of Texas and is over the age of Twenty-one years.

2. That the Complainant and respondent were lawfully married at  
Iowa Park, Texas on or about to-wit: July 1, 1949.

3. Your Complainant further avers and alleges that the said resp-  
ondent has since his marriage with/ <sup>her</sup> become addicted to habitual use  
of narcotics or illegal, strong drugs, and that said habit has contin-  
ued to the filing of this bill.

The premises considered, your Complainant makes the said Helen A.  
Long a party respondent to this bill of complaint, and in order that  
the complainant may have the relief herein prayed for, may it please  
your Honor to cause the State's Writ of Subpoenanto be issued, directed  
to the said Helen A. Long, commanding her to answer, plead or demur to  
this bill of complaint, within the time required by law; and that on  
final hearing of his cause, that your Honor will enter a a decree div-  
orcing your complainant from the respondent, and granting the  
complainant ~~sh~~ other further and different relief as unto your Honor  
may seem just and proper, and your complainant will ever pray.

  
Solicitor for Complainant

Respondent's Address:

1436 Edney Street  
Ft. Worth, Texas

10 2976  
IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

\*\*\*\*\*

EARL M. LONG  
Complainant

VS

HELEN A. LONG  
Respondent

\*\*\*\*\*

\*\*\*\*

BILL OF COMPLAINT

\*\*\*\*

FILED

NOV 19 1952

ALICE J. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALA.

2926

RECEIPT FOR REGISTERED ARTICLE No. 540

Fee paid 30

13-30, 1952  
(Date)

Class postage paid 1

Return receipt fee 07

Declared value, \$ none

Special delivery fee \_\_\_\_\_

Surcharge paid, \$ \_\_\_\_\_

Restricted delivery  
(Accepting employee will place initials in proper space) } in person 20  
or order \_\_\_\_\_

Fee paid \_\_\_\_\_

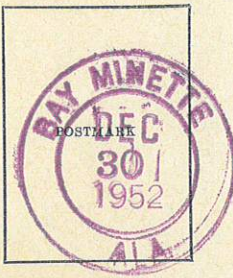
From Alice Duck Elk  
(Sender)

15m ave  
(Street and number) (Post office and State)

Addressed to Helen A. Farn  
(Addressee)

1436 Edwy St  
(Street and number) (Post office and State)

Postmaster, per [Signature]



RECEIPT FOR REGISTERED ARTICLE No. 412

Fee paid 30

11-24, 1952  
(Date)

Class postage paid 1

Return receipt fee 07

Declared value, \$ none

Special delivery fee

Surcharge paid, \$

Restricted delivery (Accepting employee will place initials in proper space) in person 20  
or order  
Fee paid

From Alice J. Duckel  
(Sender)

Primo  
(Street and number) (Post office and State)

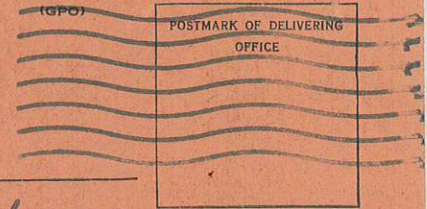
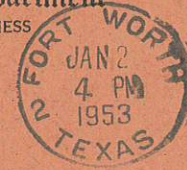
Addressed to Henry A. Long  
(Addressee)  
1436 Elm St. North St.  
(Street and number) (Post office and State)



Postmaster, per [Signature]

Post Office Department  
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300



Return to *Alice J. Leuch*

(NAME OF SENDER)

Street and Number,  
or Post Office Box,

*Box 239*

REGISTERED ARTICLE

No. *540*

Post Office *Bayou Marquette*

INSURED PARCEL

No. \_\_\_\_\_

16-12421

State *La.*

# RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1 Helena A. Long  
(Signature or name of addressee)

**Deliver to Addressee Only**

2 \_\_\_\_\_  
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

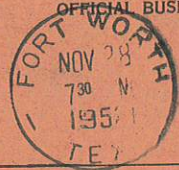
Date of delivery 1-2, 1953

FILED  
JAN 10 1953  
U.S. DEPT. OF POSTS & TELEGRAPHS

Post Office Department

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300

OFFICIAL BUSINESS



Remember - Only you can  
PREVENT  
FOREST FIRES

POSTMARK OF DELIVERING OFFICE

Return to

*Archie Leuch*

Street and Number,  
or Post Office Box,

*Box 239*

REGISTERED ARTICLE

No.

*412*

Post Office

*Bay Minette*

INSURED PARCEL

No.

16-12421

State

*Ala.*

2926

SA

# RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1 Mrs. John E. Osborn  
(Signature or name of addressee)

2 \_\_\_\_\_  
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery 11-29, 1952

**Deliver to Addressee Only**

FILED  
DEC 1 1952  
AGENT I. OSBORN, Registered



POST OFFICE DEPARTMENT  
POST OFFICE, **Bay Minette, Ala.**

OFFICIAL BUSINESS  
(No. 4)

PENALTY FOR PRIVATE USE TO AVOID  
PAYMENT OF POSTAGE, \$300  
(PM)  
BAY MINETTE  
DEC 30  
8 PM  
1952  
ALA.

*Alice J. Duck  
City*

Ms. Duell.

11-18-52

Will you please file this  
Case and obtain service upon the  
respondent by registered mail.

Thank you Arthur