



STATE OF ALABAMA,  
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. 487 Sept. Term, 1938

LUCILLE M. RAYBON, \_\_\_\_\_, Complainant

Vs.

J. G. RAYBON, \_\_\_\_\_, Defendant

To R. S. DUCK, \_\_\_\_\_, Register :

An Answer having been filed by

In the above stated cause ~~a Decree Pro Confesso having been taken against~~ the Defendant,  
and evidence having been taken, and the cause being ready for submission for final decree, and no  
defense having been interposed, the Complainant, by T. J. MASHBURN, JR.,

\_\_\_\_\_ Solicitors of record, now files with the Register of this Court  
this written request to deliver the papers in this cause to the Judge for final decree in vacation.

T. J. MASHBURN, JR.

Solicitor for Complainant.

487

# The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

LUCILLE M. RAYBON, Complainant

vs.

J. G. RAYBON, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~  
~~on~~ 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 LUCILLE M. RAYBON,

is forever divorced from the said J. G. RAYBON,

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.

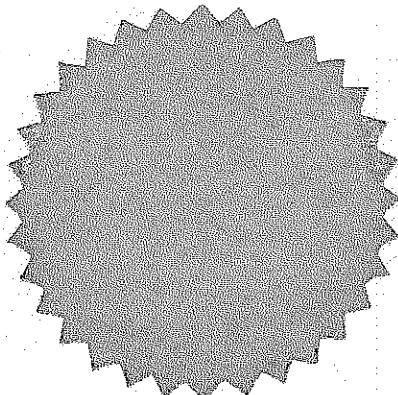
It is further ordered that LUCILLE M. RAYBON and J. G. RAYBON, be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

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

This 13<sup>th</sup> day of September, 19 38

A. W. Stare  
Judge Circuit Court, in Equity.

I, \_\_\_\_\_, Register of the Circuit Court for 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.

LUCILLE M. RAYBON,  
Complainant,

Vs.

J. G. RAYBON,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

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

ANSWER OF RESPONDENT.

Comes now, J. G. Raybon, Respondent in the above styled cause, and for answer to the Bill of Complaint filed in said cause, says:

1. That he denies each and every allegation of the Bill of Complaint, separately and severally.

2. Respondent hereby expressly waives service and notice of demand for oral examination of Complainant's witnesses; of the issue of Commission to take testimony; of notice of the time and place set for taking the same; of the right of cross-examination of Complainant's witnesses; of the right to introduce evidence in his own behalf.

3. He further agrees that the said cause may be submitted for final decree at any time on the pleadings and on Complainant's evidence as noted by the Register.

4. The Respondent prays that, if the Honorable Court renders a decree against him as prayed by the Complainant, it will grant him the right to re-marry.

  
Respondent.

LUCILLE M. RAYBON,  
Complainant,

Vs.

J. G. RAYBON,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

Testimony of LUCILLE M. RAYBON, the Complainant.

The said witness, LUCILLE M. RAYBON, being first duly and legally sworn, testified as follows:

"My name is Lucille M. Raybon. I am the Complainant in this cause and I am over the age of twenty-one years. I have lived in Baldwin County, Alabama, since 1929.

J. G. Raybon is a resident of Bay Minette, Baldwin County, Alabama, and is over the age of twenty-one years.

The said J. G. Raybon, the Respondent in this cause, and I were married in Conecuh County, Alabama, on March 19, 1916, and we lived together as man and wife until the 25 day of May, 1938. On the 25 day of May, 1938, and other occasions before that, the said J. G. Raybon, the Respondent in this cause, struck me and cursed me and threatened my life. And I am afraid that if I continue to live with him as his wife, he will carry out his threats and will seriously injure my health or take my life. Since the 25 day of May, 1938, I have not lived with the said J. G. Raybon as man and wife. His cursing and striking me were not caused by any acts of mine."

*Lucille M Raybon*

STATE OF ALABAMA,

BALDWIN COUNTY.

I, NanAlice Thompson, Deputy- , Register of the Circuit Court, in Equity, of Baldwin County, Alabama, hereby certify that on the 9th day of September, 1938, I caused the witness, Lucille M. Raybon, whose name is subscribed to the foregoing testimony, to appear before me at my office in Bay Minette, Alabama, where, after being duly and legally sworn, and upon examination by T. J. Mashburn, Jr., Solicitor for the Complainant, she testified as hereinabove set forth; that after her testimony was written down, it was read over and signed by her in my presence. I further certify that I am neither counsel nor of kin to either party in said cause, or in any way interested in the result thereof.

Witness my hand and seal this the 9th day of September, 1938.

*NanAlice Thompson*

LUCILLE M. RAYBON,  
Complainant,

Vs.

J. G. RAYBON,  
Respondent.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

IN EQUITY.

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA, IN EQUITY SITTING:

Comes your Complainant, LUCILLE M. RAYBON, and humbly  
complaining against the defendant, J. G. RAYBON, respectfully  
represents and shows unto your Honor and this Honorable Court  
the following facts as the basis for the relief hereinafter  
prayed;

1. That both your Complainant and the Respondent are  
over twenty-one years of age and bona fide residents of Baldwin  
County, Alabama, and have been for more than eight years next  
preceding the filing of this bill of complaint.

2. That your Complainant and the Respondent are  
husband and wife, having intermarried at Evergreen, Alabama,  
on the 19 day of March, 1916; that they lived together as  
husband and wife in Baldwin County, Alabama, from 1929 to  
May, 1938.

3. That in May, 1938, and various times prior thereto,  
the Respondent cursed, abused and threatened the Complainant and *on*  
several occasions actually committed violence to her person by  
striking and pushing her; that the conduct of the Respondent was  
such as to give the Complainant reasonable apprehension to believe  
and she does actually believe that it will be dangerous to her  
life and health to continue to live with the Respondent as his  
wife.

WHEREFORE, the premises considered, Complainant prays  
that your Honor will, by proper process, make the said J. G.  
Raybon 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;

Complainant further prays that upon a final hearing  
of this cause, your Honor will give and grant unto her a <sup>E</sup>decree  
of divorce forever barring the bonds of matrimony existing between  
her and the Respondent, J. G. RAYBON; that your Honor will grant  
her the right to re-marry should she so desire; Complainant  
prays for such other, further, different or general relief  
as she may be in equity and good conscience entitled to receive,  
and as in duty bound she will ever pray.

J. A. Mashburn Jr.  
Solicitor for Complainant.

FOOT-NOTE:

The Respondent, J. G. RAYBON, is required to answer  
each and every allegation contained in the foregoing Bill of  
Complaint, in paragraphs 1 to 3, inclusive, but not under oath,  
oath being hereby expressly waived.

J. A. Mashburn Jr.  
Solicitor for Complainant.

*Dick*  
*7-576-7*

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

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

LUCILLE M. RAYBON,  
Vs. Complainant.

J. G. RAYBON,  
Respondent.

**REQUEST FOR DECREE IN  
VACATION**

Filed September 9, 1938

clerk, - register

*Wm. Alex. Thompson*  
Deputy Register.

Recorded in \_\_\_\_\_ Record

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

Register.



*Deck*  
RECORDED *2-378*

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

**The State of Alabama**  
BALDWIN COUNTY

**IN EQUITY**  
Circuit Court of Baldwin County

LUCILLE M. RAYBON,

Complainant.

vs.

J. G. RAYBON,

Respondent.

**NOTE OF TESTIMONY**

Filed in Open Court this \_\_\_\_\_ 9th

day of September 193 8

*R. S. DICK*  
clerk - register

*Ann Alice Thompson*  
REGISTER

ORAL DEPOSITION.

Filed September 9th, 1938,

R. S. Duck, Register.

BY: *Madeline Thompson*  
Deputy-Register.

No. 487 Page

The State of Alabama  
Baldwin County

In Circuit Court, In Equity

EUCILLIE W. RAYBON,  
vs. Complainant.

J. G. RAYBON,

Respondent.

DIVORCE DECREE

Filed this 13 day of  
September, 1938.

R.S. Duck, Register  
By: *Walter Thompson*  
Equity