

769

THE STATE OF ALABAMA }  
Baldwin County }

Circuit Court of Baldwin County, Alabama,  
(In Equity)

MARY PAUL COMPLAINANT

vs.

WILLIAM THOMPSON RESPONDENT

I, FRANCIS BEATTY

as Register and Commissioner

have called and caused to come before me

MARY PAUL and WILLIAM THOMPSON

witness es named in the requirement for Oral Examination, on the 24th day of October

1941, at the office of BEENE & PAUL

in Bay Minette, Alabama, and having first sworn said witness es to speak the

truth, the whole truth, and nothing but the truth, the said

MARY PAUL doth depose and say as follows:

My name is Mary Paul. I live at Mobile, Alabama. I am over twenty-one years of age. The Respondent is over twenty-one years of age, and a resident of Mobile, Alabama.

The Respondent and I were married at Vascagoula, Mississippi, on August 21, 1941.

Immediately after our marriage I learned that the Respondent and I could not live together as husband and wife. The Respondent threatened and abused me, and conditions grew to such an extent that his conduct was such that I had every reasonable apprehension to believe and did believe that if I continued to live with him, he would do violence to my person that would necessarily endanger my life and health.

I have no children.

I am twenty-two years of age, and the Respondent is twenty-three years of age, and I know that we cannot live together as husband and wife.

Mary Paul

WILLIAM THOMPSON, A TRUSTEE FOR THE STATE OF ALABAMA, IN THE COUNTY OF BALDWIN, ALABAMA, DEPOSED AND SWORE TO THE FOREGOING AND SAID:

My name is William Thompson. I am personally acquainted with the Complainant and the Respondent in the above styled cause. They were married at Vascagoula, Mississippi, on August 21, 1941. I have had occasion to see and be around them since they married.

I know on my own personal knowledge that conditions are such that they cannot live together as husband and wife. The complainant is now, and has been living with her folks, and the Respondent has contributed nothing to the support of the Complainant.

William Thompson

EMIL PAUL, Complainant,  
VS.  
FRANCIS FORD PAUL, Respondent.

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

And now comes the Respondent, FRANCIS FORD PAUL, in his own proper person and denies each and every allegation contained in the bill of complaint, heretofore filed in the above styled cause, and demands strict proof of the same.

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

Francis Ford Paul  
Respondent.

Witnesses:

Francis Bartley  
Pearl Lambert

THE STATE OF ALABAMA,  
Baldwin County

CIRCUIT COURT

TO FRANCIS BRANTLEY

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 ERBY PAUL and WILLIAM BLOKBY

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

ERBY PAUL Complainant

and

FRANCIS FORD PAUL Defendant,

on oath to be by you administered, upon

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

Witness 24th day of October, 1941

*Francis Ford Paul*

REGISTER

Commissioner's Fee \$

Witness' Fees, \$

STATE OF ALABAMA,

CIRCUIT COURT.

To ALL MEMBERS OF THE STATE OF ALABAMA - GREETING:

WE COME TO YOU, That you sum on MAURICE PAUL PAUL to be and appear before the Judge of the Circuit Court of Baldwin County, Alabama, exercising Chancery Jurisdiction within thirty days after the service of such sum, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by MAURICE PAUL against MARSHALL PAUL PAUL, and further to do and perform what said Judge shall order and direct in that behalf. And this the said Respondent shall in no wise omit, under penalty, etc. And we further command that you return this writ with your enforcement thereon, to our said Court immediately upon the execution thereof.

Witness, L. S. PAUL, No. 1 Tax of said Circuit Court, this 23 day of October, 1941.

*R. Paul*  
Register.

MAURICE PAUL, Complainant,	)	L. S. PAUL, CLERK OF
VS.	)	SAYBROOK COUNTY, ALABAMA,
MAURICE PAUL PAUL, Respondent.	)	IN EQUITY.

TO HONORABLE W. W. PAUL, JUDGE OF CHANCERY COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Now come your Complainant, MAURICE PAUL, and further complaining against the Respondent, MARSHALL PAUL PAUL, respectfully represent and show unto your Honor and this Honorable Court as follows:

1.

That the Complainant and the Respondent are both over twenty-one years of age, and residents of the State of Alabama;

2.

That the Complainant and the Respondent were married at Natchez, Mississippi, on August 21, 1941;

3.

That immediately after they were married the Complainant learned that she could not live with the Respondent as his wife; that the Respondent threatened and abused the Complainant; that the conduct of the Respondent was such as to cause the Complainant every reasonable apprehension to believe, and she did believe that if she lived with the Respondent, as his wife, he would carry out his threats and do violence to her person which would necessarily endanger her life and health.

Therefore, the premises considered, the Complainant prays that your Honor will by proper process make the said Respondent, MARSHALL PAUL PAUL, 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.

The Complainant further prays that upon final hearing of this cause, your honor will grant unto her a decree of divorce forever barring the bonds of matrimony existing between her and the Respondent; and that your honor will give and grant unto her such other, further, different and general relief as she may be in equity and good conscience entitled to receive and as in duty bound she will ever pray.

BECKE C. HILL

D: *Shirley*  
Solicitors for Complainant.

The State Of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

MARY PAHL Complainant
VS
FRANCIS FORD PAHL Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Answer and Waiver of Respondent, 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 Complainant, MARY PAHL, is forever divorced from the said Respondent, FRANCIS FORD PAHL.

for and on account of Cruelty

It is further ordered, adjudged and decreed that the Complainant be, and she is hereby restored her maiden name, MARY THOMPSON

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 the 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 MARY PAHL, the Complainant, pay the cost herein to be taxed, for which execution may issue.

This 28th day of October, 1911.

J. W. Hare
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.

**RECORDED**

NO. *765*

**THE STATE OF ALABAMA**

**Baldwin County**

**CIRCUIT COURT**

*Mary Pahl*

Complainant

vs.

*Francis Ferd Pahl*

Defendant

**Commission To Take Deposition**

COMMISSIONER:

Witnesses:

769 RECORDED

Answer Ed Haven

Mary Pahl

vs

Francis Gerd Pahl

Filed Oct 24 1941

Rehder

Register

I, Frances Brantley as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down in writing by me in the words of the witness ~~as~~ and read over to ~~the~~ and ~~the~~ signed the same in the presence of myself and W. H. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness ~~as~~ or had proof made before me of the identity of said witness ~~as~~; 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 24th day of October 1941.

Frances Brantley (L. S.)

No. 2605 Page \_\_\_\_\_

THE STATE OF ALABAMA,  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

Mary Cole  
COMPLAINANT

Frances Brantley vs. Mary Cole

RESPONDENT

ORAL DEPOSITION

Filed Oct 27<sup>th</sup>, 1941

Frances Brantley  
Register.

RECORDED IN

Record \_\_\_\_\_

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

Register \_\_\_\_\_

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**The State Of Alabama**

**Baldwin County**

In Circuit Court, In Equity

**MARY PAHL**  
vs. Complainant.

**FRANCIS FORD PAHL**  
Respondent.

**DIVORCE DECREE**

*Filed Oct. 29, 1944*

*A. S. Dorch*  
*Register*

**BEEBE & HALL, LAWYERS**  
**Bay Minette, Alabama**

The State of Alabama Baldwin County

Baldwin County Alabama

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769  
Summons and Complaint

RECORDED

Executed Oct 24<sup>th</sup> 1941  
by serving copy of within Summons and  
Complaint on

Francis Ford Pahl

Mary Pahl  
Complainant

vs

Francis Ford Pahl  
Respondent

W.R. Stuart Sheriff

By M.B. Hamilton Deputy Sheriff

Served Oct 24<sup>th</sup> 1941

R. Stuart  
Register