

CATHERINE A. PEARSON  
Complainant.

VS.

JULIAN M. PEARSON  
Respondent.

IN EQUITY.

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

This cause coming on to be heard was submitted for final decree upon the Bill, Answer and Complainant's testimony, as noted by the Register.

Upon consideration, the Court is of the opinion that Complainant is entitled to the relief prayed for in her Bill of Complaint.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED  
that the bonds of matrimony heretofore existing between  
Complainant and Respondent be, and the same are, hereby  
annulled, and the said CATHERINE A. PEARSON be, and she is  
hereby forever divorced from the said JULIAN M. PEARSON.

IT IS FURTHER ORDERED AND DECREED that the said Catherine A. Pearson shall not marry again except to Julian M. Pearson within sixty days from this date, and that should an appeal be taken from this decree neither party shall have the right to marry again except to the other during the pendency of such appeal.

IT IS FURTHER ORDERED, AND DECREED THAT the Complainant may resume her maiden name if she so desires.

It is further ordered that the Respondent pay the costs of this suit, for which execution may issue.

Done at Monroeville, Alabama, this 16<sup>th</sup> day of  
August, 1933.

F. W. Hare.

Judge.

RECORDED  
C.B.H.

CATHERINE A. PEARSON  
Complainant.

VS.

JULIAN M. PEARSON  
Respondent.

DECREE OF DIVORCE.

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

CATHERINE A. PEARSON, by this her Bill of Complaint  
presented against JULIAN M. PEARSON, respectfully shows:

FIRST: That she and the said JULIAN M. PEARSON are now and  
have been all of their lives residents of the State of Alabama and  
are now residents of the County of Baldwin. That both are over the  
age of twenty-one years.

SECOND: That on January 3rd, 1933 they were married at Pratt-  
ville Alabama and have lived since in Fairhope Alabama as husband  
and wife up to the early part of March last when they parted for the  
reason here set forth and have since lived separate and apart.

THIRD: That since their marriage Complainant has discover-  
ed that the Defendant is a man of violent temper, subject to fits  
of rage in which he loses control of himself and under the influ-  
ence of which he is dangerous to anyone against whom his wrath may  
be directed. That he has on several occasions become enraged with  
Complainant for no fault other than a difference of opinion and  
has denounced her conduct in matters of relatively small importance  
to such an extent that she fears personal violence at his hands..She  
has therefore left him and feels reasonably assured that if she con-  
tinue to live with him he would very probably do her bodily harm in  
one of his fits of unreasoning rage.

THE PREMISES CONSIDERED, Complainant prays that the said  
Julian M. Pearson be made defendant to this bill and by appropri-  
ate process be notified to answer same within the time prescribed  
by law.

Complainant further prays that upon the hearing of this c  
cause a decree be rendered forever divorcing her from the said  
Julian M. Pearson, granting her the right to marry again should she  
so desire, to resume her maiden name and such other, further of dif-  
ferent relief as to equity may seem meet.

*Elliot B. Rinsley*  
Solicitor for Complainant

CATHERINE A. PEARSON,

E Q U I T Y .

Complainant,

CIRCUIT COURT OF BALDWIN COUNTY.

vs

JULIAN M. PEARSON,

Respondent.

THE DEPOSITIONS OF JULIE O. SULLIVAN and CATHERINE A. PEARSON, WITNESSES FOR COMPLAINANT, TAKEN BEFORE BERNICE S. FOLMAR ON AUGUST 8th, 1933.

The said witnesses, being first sworn to tell the truth, upon examination by the Solicitor for the Complainant, testified as is here set forth.

C A T H E R I N E . A . P E A R S O N ,

I am the Complainant in this cause. I am twenty-four years of age and have been for more than two years next preceeding this date a bona fide resident of the State of Alabama. I am now, and have been since my marriage, a resident of Fairhope. Julian Pearson is also a resident of Alabama. He is older than I. At present he is in Montgomery with his people. We were married at Prattville on January 3rd last and at once came to Fairhope where we lived together as husband and wife till the early part of March when we parted and have since lived separate and apart. We are both native Alabamians.

My husband is a man of violent temper. He was a spoiled child and was not taught self control. He is a large, well-built man, but flies into violent rages like a little child over the most trivial things. We had not been married but two weeks when he flew into a paroxysm of rage and abused me before all the people present over a bridge game. After that he flew into other attacks of rage over the most trifling matters followed by fits of moreseness and silences. I could never tell when he was going to break out in one of his spells for he would do so for the most trivial causes. He had no patience with any one who differed from him. After we were married I soon saw a side of his nature that I had not suspected and found that it would be impossible to live with him. He kept

getting worse and while in our short married life he never struck me, I have seen him smash to pieces things that he was working with and under such circumstances that it made me fear that sooner or later he would do me some harm when he lost control of himself so completely. As I said before, he is a large man and I am small and not too placid tempered myself. Among other things he objected to my ideas and views of life — to everything that differed from his own views. He was so very intolerant and impatient and expected me to humor his lightest whim, as his parents had done that we were in hot water all the time and from the way he kept getting worse I soon saw serious trouble ahead if we did not part, so I left him for fear of physical violence, which would have come had we continued to live together. He recognized this too and regretted it, for he seemed very fond of me under normal conditions, though when enraged he did not think of this. My people feared for my safety too and felt that I was wise to leave him before something serious happened.

JULIE O. SULLIVAN,

*Catharine A. Pearson*

I am the sister of complainant and have read over her testimony and can corroborate what she says. While I have not seen Julian in one of his more violent rages I have seen him get very irritable and sulky over almost nothing and have heard others speak of how he loses control of himself. I have not lived near them very long, but my sister has on a number of occasions told me of the trouble she was having and how she feared that she could not live with him. He was a spoiled son and could not stand for anyone to differ with him and had my sister continued to live with him he would in time have hurt her bodily as he repeatedly did hurt her feelings by the things he would say to her in his rages.

*Julie O. Sullivan*

I, Bernice S. Folmar, the commissioner named in the attached commission issued from the Equity side of the Circuit Court of Baldwin County in a case therein pending, in which Catherine A. Pearson is Complainant and Julian M. Pearson is Respondent, hereby certify that on the 8th day of August 1933, I caused Catherine A. Pearson and Julie O. Sullivan, the witnesses for Complainant named in said commission to appear before me in my office in Fairhope Alabama where, after being sworn to tell the truth, upon examination by Complainant's solicitor they testified as is hereinbefore set forth; that their testimony being reduced to writing was read over and signed by them in my presence.

I further certify that I am neither of counsel or of kin to either party to this cause or in anywise interested in the result thereof.

WITNESS my hand and seal as commissioner this the 8th day of August, 1933.

*Bernice S. Folmar*  
(SEAL)

Commissioner.

The State of Alabama, {  
Baldwin County

CIRCUIT COURT

In Equity

To Miss Bernice Folmar,

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 Mrs Anna C. Gay, Miss Julie A Sullivan,

Mrs Catherine A Pearson,

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

Catherine A. Pearson

Complainant

and Julian .M. Pearson,

Defendant,

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

Witness 7th, day of August, 1933

Mary Alice Stone

REGISTER

COMMISSIONER'S FEE, \$ 5.00 not paid

WITNESS' FEES, \$

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

**The State of Alabama**  
**BALDWIN COUNTY**  
**CIRCUIT COURT**

Catherins A. Pearson

vs. Complainant

Julian M. Pearson,

Defendant

**COMMISSION TO TAKE DEPOSITION**

**COMMISSIONER:**

Miss Bernice M. Folmar,

**WITNESSES:**

*Filed Aug 9<sup>th</sup> 1983*  
*W. A. Stone*  
*Register*

*Miss Bernice M. Folmar*



CATHERINE A. PEARSON

EQUITY.

Complainant

CIRCUIT COURT OF

VS.

BALDWIN COUNTY ALABAMA

JULIAN M. PEARSON

Respondent

Comes Julian M. Pearson, Respondent in this cause and for answer to the bill says:

FIRST: He admits the allegations as to the names, ages and marriage of the parties.

SECOND: He denies all other material allegations of the bill and demands strict proof thereof.

He hereby waives notice of application for commission to take Complainant's testimony, time and place of taking same, and of offering evidence in his own behalf and consents that said case may be submitted for final decree in vacation upon the pleadings and Complainant's testimony without further notice to him.

*Julian M. Pearson*  
Respondent.

State of Alabama:  
Montgomery County:

I, the undersigned notary hereby certify that Julian M. Pearson, whose name is signed to the foregoing answer acknowledged before me this day that he signed same with full knowledge of its contents.

the 26<sup>th</sup> Given under my hand and official seal this day of July 1933.

*Junius Pierce*  
Notary Public Montgomery  
County Alabama.

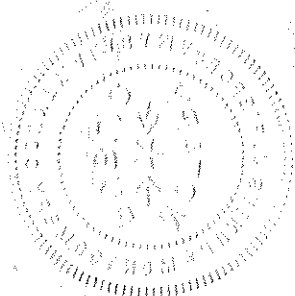
My commission expires Oct. 20<sup>th</sup>, 1936

RECORDED  
ask  
CATHERINE A. PEARSON,  
Complainant,

versus

JULIAN M. PEARSON,  
Respondent.

Answer.



PROSECUTOR GENERAL  
COMMONWEALTH OF MASSACHUSETTS

2001 AUG 14 1988

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
SOUTHERN DISTRICT  
JULIAN M. PEARSON  
vs.  
CATHERINE A. PEARSON

Answer  
JULIAN M. PEARSON

Prothonotary

and of said court

Prothonotary  
JULIAN M. PEARSON  
vs.  
CATHERINE A. PEARSON

Prothonotary  
JULIAN M. PEARSON  
vs.  
CATHERINE A. PEARSON

Prothonotary  
JULIAN M. PEARSON  
vs.  
CATHERINE A. PEARSON

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Prothonotary  
JULIAN M. PEARSON  
vs.  
CATHERINE A. PEARSON

Filed Aug 9<sup>th</sup> 1988  
Mr. A. Stone  
Re g. l. l. l.

The State of Alabama, }  
Baldwin County

*Catherine A Pearson*

Complainant.....

vs.

CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA

In Equity.

*Julian M Pearson*

Defendant.....

The *Complainant*

requests the oral examination of the following named witnesses, on behalf of *himself*

- viz:

*Mrs Annie C Gay*  
*Miss Julia C Sullivan and*  
*Mrs Catherine A Pearson*

said witnesses reside in the County of *Baldwin*

State of Alabama.

*Miss Bernice S Tolman* who resides at  
*Robertsdale*

..... or, The Register of this Court is suggested as a suitable person  
to be appointed Commissioner to take the deposition of said witness on such oral examination.

*Ellis L. R. Kirby*

Solicitor for *Complainant*

CIRCUIT COURT OF  
Baldwin County, Alabama

IN EQUITY

*Bathurine M. Pearson*

Complainant..

VS.

*Julian M. Pearson*

Defendant..

DEMAND FOR ORAL EXAMINATION

Filed *August 7<sup>th</sup>* 192*5*

*Mary Alice Stone* Register.

# Circuit Court, Baldwin County, Ala.,

## IN EQUITY.

*Catherine A. Pearson* vs. *Julian M. Pearson*

PLAINTIFF

DEFENDANT

### BILL OF COST

	Dollars	Cts.		\$	Cts.
<b>Fees of Register</b>			<b>AMOUNT BROUGHT FORWARD</b>		
Filing each bill and other papers	6	60	For receiving, keeping and paying out or distributing money, etc. 1st \$1,000 1 per ct.; all over \$1,000 and not over \$5,000, 3-4 of 1 per ct.; all over \$5,000 and not exceeding \$10,000, 1-2 of 1 per ct.; all over \$10,000, 1-4 of 1 per ct.	4	50
Suing each Subpoena		50	Receiving, keeping and paying out money paid into court, etc., 1-2 of 1 per ct. of amount received.		
Suing each copy thereof		30	Each Notice Sent by Mail to Creditors	15	
Entering each return thereof		15	Filing, Receipting for and Docketing each Claim, etc	25	
For each Order of Publication		1 00	For all entries on Subpoena Docket, etc.	50	50
Suing Writ of Injunction		1 50	For all entries on Commission Docket, etc.	50	3 20
For each Copy thereof		50	Making Final Record, per hundred words	15	1 00
Entering each return thereof		15	Certified Copy of Decree	1 00	50
Suing Writ of Attachment		1 00	Report of Divorce to State Health Office, Acts 1915	50	
Entering each return thereof		15	<b>Total Fees of Register</b>	9	80
Docketing each case	1	00			
Entering each Appearance		25	<b>FEEs OF SHERIFF</b>		
Suing each Decree Pro Confesso on personal service	1	00	Serving and Returning Subpoena on Deft.	\$1	50
Suing each Decree Pro Confesso on publication	1	00	Serving and Returning Subpoena for Witness	65	
Each Order Appointing Guardian	1	00	Levying Attachment	3	00
Any other order by Register		50	Entering and Returning same	25	
Suing Commission to Take Testimony		50	Entering and Returning Execution	25	
Receiving and Filing		10	Selling Property Attached	25	
Dorsing each package		10	Impanelling Jury	75	
Entering Order Submitting Cause		50	Executing Writ of Possession	2	50
Entering any other Order of Court		25	Collecting Execution for Costs	1	50
Suing all Testimony		50	Serving and Returning Sci. Fa., each	65	
Abstract of Cause, etc.		1 00	Serving and Returning Notice	65	
Entering each Decree		75	Serving and Returning Writ of Injunction	1	50
For Every Hundred Words Over Five Hundred		15	Serving and Returning Writ of Exeat	1	50
Making Account on Reference		3 00	Taking and Approving Bonds, each	1	00
Making Testimony, etc.		15	Collecting Money on Execution		
Each Report, Five Hundred Words or less		2 50	Making Deed	2	50
For every Hundred Words Over Five Hundred		15	Serving and Returning Application	1	00
Amount Claimed, Less than Five Hundred Dollars, etc.		2 00	Serving Attachment, Contempt of Court	1	50
Suing each Subpoena		25	<b>TOTAL FEES OF SHERIFF</b>		
Witness Certificate, each		25			
Suing Execution, each		75	<b>Recapitulation</b>		
Entering each Return		15	Register's Fees	9	80
Making and Approving Bond, each		1 00	Sheriff's Fees		
Making Copy of Bill, etc.		15	Commissioner's Fees	5	00
Each notice not otherwise provided for		50	Solicitor's Fees		
Each Certificate or Affidavit, with Seal		50	Witness Fees		
Each Certificate or Affidavit, no Seal		25	Guardian Ad Litem		
Preparing and passing on application for Receiver or Trustee	3	00	Printer's Fees		
Each Settlement with Receiver or Trustee	3	00	Trial Tax	3	00
Examining each Voucher of Receiver or Trustee	10		Recording Decree in Probate Court		
Examining each Answer on Exception	3	00	<b>Total</b>	17	80
Recording Resignation or Suggestion of Death of Trustee	75				
Entering each Certificate to Supreme Court	50				
Making Questions and Answers, etc.	25				
For all other service relating to such proceedings	1	00			
For service in proceeding to relieve minors, etc. same fee as in similar cases.					
Commission on sales, etc.: 1st \$100, 2 percent; all over \$100, and not exceeding \$1000, 1 1/2 per cent; all over \$1,000 and not exceeding \$20,000, 1 per cent; all over \$20,000, 1-4 of 1 per cent.					
<b>Sub Total Carried Forward</b>	4	30			

Received payment this \_\_\_\_\_ day of \_\_\_\_\_ 193 \_\_\_\_\_

NOTE: Unless the above costs in this cause are paid within ten days of the present date, execution will be issued and placed in the hands of Sheriff for collection, creating more costs.

Register.

Circuit Court, Baldwin County, Ala.  
In Equity.

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

VS.

Cost Bill

Paid \_\_\_\_\_, 193

Register.