

2408

JULIA MARTIN THOMPSON	¶	
Complainant	¶	IN THE CIRCUIT COURT OF
VS	¶	BALDWIN COUNTY, ALABAMA
RAYMOND EDWARD THOMPSON	¶	IN EQUITY
Respondent	¶	

This cause coming on to be heard was submitted upon Bill of Complaint, Answer and 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 JULIA MARTIN THOMPSON is forever divorced from the said RAYMOND EDWARD THOMPSON for and on account of cruelty.

It is further ordered, adjudged and decreed, by the Court, that the Complainant be, and she is hereby awarded the care, custody and control of the minor child, Geraldine Ann Thompson, subject to the right of the Respondent to visit her at reasonable times.

It is further ordered, adjudged and decreed, by the Court, that the Respondent pay to the Complainant for the maintenance and support of the minor child, Geraldine Ann Thompson, the sum of \$10.00 per week, provided however, if two or more of said children live with the Complainant, then the Respondent shall pay toward the support and maintenance of said children living with the Complainant the sum of \$7.50 per week for each child, so living with the Complainant.

It is further ordered, adjudged and decreed, by the Court, that the minor children, Ray Edward Thompson, Harold Franklin Thompson and Jerry Alton Thompson, shall have the right to live with either the Complainant or the Respondent, as they see fit, and that if any of them elect to live with the Complainant, the Respondent shall contribute toward the maintenance and support of such child or children living with the Complainant as herein provided.

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 RAYMOND EDWARD THOMPSON the Respondent pay the cost herein to be taxed, for which execution may issue.

This 4th day of ~~December, 1949~~ January, 1950.

J. Fair J. Mashburn Jr.
Judge Circuit Court, In Equity.

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Date 7/16 vol. or drawing no. Document 1020

Julia Martin Thompson

vs.

Raymond Edward Thomson

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complaint upon the original Bill of Complaint, _____
Oral Deposition and agreement between parties as to maintenance, property
settlement and the custody of children _____

and in behalf of Defendant upon _____ answer and waiver _____

C L J. Thompson

W. J. ...

Register.

No. 2-14-2-8.....

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Julia Martin Thompson

vs.

Raymond Edward Thompson

NOTE OF TESTIMONY

Filed in Open Court this 28th.....
day of December, 1949.....

Wm. J. Duck
Register.

Printed By The Baldwin Times

THE STATE OF ALABAMA }
Baldwin County }

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

Julia Martin Thompson COMPLAINANT

vs.

Raymond Edward Thompson RESPONDENT

I, Peggy Guy

as Register and Commissioner in the above styled cause

have called and caused to come before me

Mrs. Julia Martin Thompson and Mrs. Ruth C. Freeman

witnesses named in the requirement for Oral Examination, on the 10 day of December

1949, at the office of C. LeNoir Thompson, Attorney-at-Law,

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

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

doth depose and say as follows:

That my name is Julia Martin Thompson, and that I am over the age of twenty-one years and a resident of Baldwin County, Alabama and have been for more than two years next preceding. The Respondent, my husband, is also over the age of twenty-one years and is a resident of Alabama and has been more than two years next preceding. The Respondent, Raymond Edward Thompson and I were married October 28th, 1928 at Crestview, Florida and have lived together since that time as husband and wife. On several occasions and on or about August 25th the Respondent struck and abused me and beat me with his fist and on the next morning so misused and abused my person that I was injured, was sick and sore and believing my life or health to be in danger we separated. As fruits of our marriage there are five children; Marie, age nineteen and married; Ray, age seventeen; Harold, age fifteen; Jerry, age ten; and Geraldine, a girl, age seven. An agreement between my husband and myself has been made concerning the care and custody and control of our children, which I ask the court to approve I consider and submit to the court that I am suitable and proper to care for and have the custody and control of my children and ask that the court also approve the maintenance agreed upon for the children at this time.

Julia Martin Thompson

That my name is Mrs. Ruth C. Freeman. I am over the age of twenty-one years and I know both parties to this cause more than three years. I know that they are husband and wife and have lived together as such in Baldwin County, Alabama more than two years next preceding. I know their children and all of them except Marie, who is married, reside with their mother in Baldwin County. The Respondent has mistreated his wife on several occasions to my knowledge and the last time it is my information that he abused her so badly that she had him arrested. I do not know of any cause on her part for the cruel treatment he gave her. This last occasion was the latter part of August.

Mrs. Ruth C. Freeman

I, Peggy Guy 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 es and read over to them and they signed the same in the presence of my-

self and C. LeNoir Thompson, Attorney-at-Law,

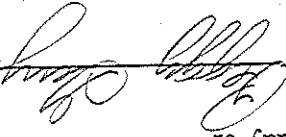
at the time and place herein mentioned; that I have personal knowledge of personal identity of said

witness es or had proof 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 10th day of December 194 9.

(L. S.) 

No. 7408 Page

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY

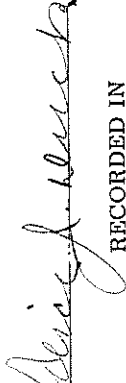
Julia Martin Thompson
COMPLAINANT

vs.

Raymond Edward Thompson
RESPONDENT

ORAL DEPOSITION

Filed 12-28, 194 9

 Register.
RECORDED IN

Record

Vol. Page

Register

STATE OF ALABAMA §

BALDWIN COUNTY §

KNOW ALL MEN BY THESE PRESENTS, That this agreement made and entered into by and between Julia Martin Thompson, party of the first part, and Raymond Edward Thompson, party of the second part, WITNESSETH:

WHEREAS the parties hereto can no longer live together amicably as husband and wife, and said parties have reached a full and complete agreement and settlement as to their mutual property rights, custody of the children, alimony, support and any and all other property questions which might arise, said agreement being set out hereinbelow:

NOW THEREFORE, for and in consideration of the mutual agreement by and between the parties hereto, they do hereby agree as follows and stipulate with the Circuit Court of Baldwin County, in equity, in which Court there is now pending divorce proceeding between the parties hereto, as follows:

ONE. It is agreed that the minor children born of said marriage between the parties hereto, namely, Ray Edward Thompson, age seventeen; Harold Franklin Thompson, age fifteen; Jerry Alton Thompson, age nine; shall have the right to live with either party hereto as they each shall so desire, subject to the approval of this Honorable Court and the party of the second part agrees that he will support, take care of and furnish a home to any of his said children who wish to live with him and any of his said children so desiring to live with him shall be under his custody; as to the minor child, Geraldine Ann Thompson, age 7, it is agreed that the Complainant shall have the custody of said minor child; that any of his said children named above who desire to live with the party of the first part shall have the right to do so, at their own election, and any of his said children who shall choose to live with the party of the first part shall be under the custody of the party of the first part and that the party of the second part will turn over to and pay to the party of the first part, \$10.00, ^{per week} for the support of one child, living and residing with the party of the first part and in addition the party of the second part will turn over to the party of the first part the sum of \$15.00, if two children reside with the party of the first part and \$750 in addition thereto for each additional child, which may reside with the party of the first part; in case the party of the second part meets with an accident of sickness or loses his employment, it is understood, the court shall take that fact into consideration, in determining the amounts to

be paid for the support of the children.

TWO. The party of the second part does hereby given to the party of the first part all of his right, title and interest in and to any and all personal property now located in the home of said parties hereto located in Baldwin County, Alabama. The party of the first part hereby abandons any and all claims which she might have to the 1938 Chevrolet Tudor Sedan, which is now owned by the party of the second part.

THREE. The Party of the second part hereby agrees to pay the cost of court and the Solicitor's fee for the party of the first part, in event said party of the first part is awarded her divorce by the Circuit Court at Baldwin County, Alabama, provided however that said Solicitor's fee for the party of the first part shall not exceed \$50.00. The party of the first part hereby waives any and all claim to alimony for herself, pendente lite or permanent.

FOUR. It is further agreed that the property owned jointly by the parties hereto, and occupied as a homestead, near Spanish Fort, in Baldwin County, Alabama, will be sold and the proceeds of the sale divided equally between the parties; that the selling price shall be not less than \$1500.00; that the first party shall have thirty days in which to locate a buyer at a price equal to or greater than \$1500.00, and that if a purchaser cannot be found at a price of \$1500.00 or more, within said thirty days, then it shall be optional with the first party as to whether or not she shall pay the second party \$750.00 for his interest or accept from the Second party \$750.00, for her interest that in the event of a sale both parties bind themselves to execute such papers and conveyances as may be necessary to perfect a sale.

IN WITNESS WHEREOF, The parties have hereunto set their hands and seals in duplicate, on this the 2nd day of December, 1949.

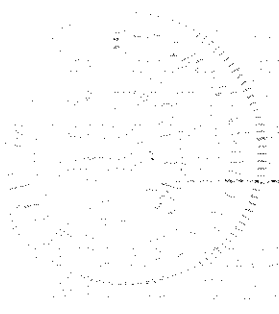
Julia Martin Thompson
Raymond Ed. Thompson (SEAL)

STATE OF ALABAMA
BALDWIN COUNTY

I, Tom M. Hall, a Notary Public, in and for said County, in said State, hereby certify that Julia Martin Thompson and Raymond Edward Thompson, whose names are signed to the foregoing conveyance, and who are known to me, acknowledged before me on this day that, being informed of the contents of the conveyance, they executed the same voluntarily on the day the same bears date.

Given under my hand and seal on this the 2 day of December, 1949.

Tom M. Hall
Notary Public



2408

Agreement

FILED
DEC 23 1949
U.S. DEPT. OF JUSTICE, REGISTER

THE STATE OF ALABAMA, }

BALDWIN COUNTY. }

Circuit Court

TO: Peggy Guy

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

Julia Martin Thompson and Ruth C. Freeman

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

Julia Martin Thompson, Complainant

and

Raymond Edward Thompson, Respondent

on oath, to be by you administered, upon Peggy Guy to take and certify the depositions of the witnesses and return the same to our Court, with all convenient speed, under your hand.

Witness 10th day of December, 1949

W. J. H. H. H.
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No.

2408

THE STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Julia Martin Thompson

Complainant

VS.

Raymond Edward Thompson

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Peggy Guy

WITNESSES:

Julia Martin Thompson

Ruth C. Freeman

JULIA MARTIN THOMPSON	Ø	
Complainant	Ø	IN THE CIRCUIT COURT OF
VS	Ø	BALDWIN COUNTY, ALABAMA
RAYMOND EDWARD THOMPSON	Ø	IN EQUITY
Respondent	Ø	

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

Comes the Complainant, Julia Martin Thompson, who shows unto your Honor the following state of facts:

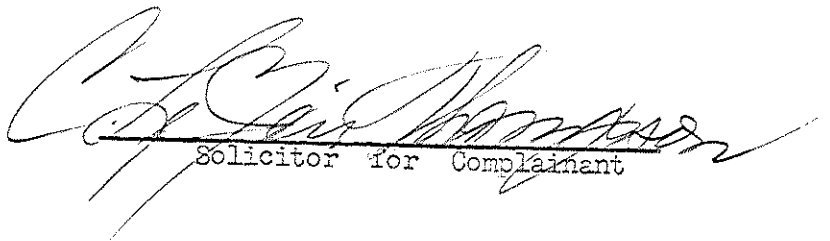
1. That your Complainant is over the age of twenty-one years and the Respondent is over the age of twenty-one years and both are bona fide residents of Baldwin County, Alabama, and have been more than four years next preceding; however the Respondent is temporarily sojourning in Mobile, Alabama.
2. That the Complainant and Respondent were married October 28th, 1928 at Crestview, Florida and have lived together since that time as husband and wife.
3. Your Complainant avers and charges that the said Respondent did on or about the Twenty-fifth day of August, 1949, and many times prior thereto assault, beat, hit and strike Complainant; that said Respondent has committed actual violence on her person attended with danger to her health or life; Complainant avers and charges that Respondent has made numerous threats of doing her physical harm and from his manner and conduct toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.
4. That as fruits of this marriage there were five children; Marie, age nineteen and married; Ray, age seventeen; Harold, age fifteen; Jerry, age ten; and Geraldine, a girl, age seven.

PRAYER

WHEREFORE, the premises considered the Complainant prays that your Honor will by proper process, make the said Raymond Edward Thompson, party Respondent to this caus of action in order that Complainant may have the relief hereinafter prayed for, 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.

EX-102

That on final hearing of this cause, that your Honor will grant unto her an absolute divorce, forever dissolving the bonds of matrimony existing between your Complainant and the Respondent, and at the time of rendering this decree, your Honor will grant to your Complainant the care, custody and control of their infant daughter, Geraldine Thompson, and will provide that your Complainant shall have the care, custody and control of the other children, fruits of this marriage, who may reside with your Complainant with the further understanding that the Respondent shall be permitted to see these children at reasonable times or have them visit with him at the convenience of the parties; that your Honor will grant to the Complainant maintenance for said children in the amount as follows; Ten Dollars (\$10.00) per week for one child, Fifteen Dollars (\$15.00) per week for two children, Eight Dollars and Fifty Cents (\$8.50) per week for each additional child residing with your Complainant and that upon a final hearing of this cause that your Honor will render a decree granting your Complainant permanent maintenance for the children aforesaid and that a suitable property division having been agreed upon between the parties, your Complainant prays for such other further or general relief to which she may be entitled.


Solicitor for Complainant

[Handwritten signature]

2408
Julia Martin Thompson
VS
Raymond Edward Thompson

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FILED
DEC 28 1949