OMMISSION TO TAKE DEPOS	TIONS				-
THE STATE OF AL		1990 - 19900 - 19900 - 1990 - 1990 - 19900 - 1990 - 1990 - 1990 - 1990 -			2
Baldmin Cour		Cir	cuit Cour		i m s s m s s
	44 9				
				 Constraints Constraints Constraints Constraints Constraints Constraints Constraints Constraints 	
O: CATHERIN	E MASON, Foley, A	labama.		1 10 South	
se ago de ^{les} , r _{eco} regita delesará	ini Marina Antonio de la companya	1	2 2 4		:
n an	1.1 1.2 2.1 3.2 3.2 4.2 4.2 4.2 4.2 4.2 4.2 4.2 4.2 4.2 4	4,4%	nd .	-	
			wi ina		
KNOW YE: that we, havin ommissioner, and by these p o call before you and examine	presents do authorize you	, at such tim Mattei			
ommissioner, and by these p	Felen Marie	, at such tim Mattei			
ommissioner, and by these p call before you and examine	Dresents do authorize you <u>Felen Marie</u> <u>Cherie</u> Duck	, at such tim Mattei			
ommissioner, and by these p call before you and examine witnesses in behalf of _Hel	oresents do authorize you <u>Felen Marie</u> <u>Cherie Duck</u> en Marie Mattei	, at such tim Mattei Worth	e and place as		appoint
ommissioner, and by these p call before you and examine witnesses in behalf of _Hel	oresents do authorize you <u>Felen Marie</u> <u>Cherie Duck</u> en Marie Mattei	a, at such tim	e and place as	s you may	appoint
ommissioner, and by these p call before you and examine witnesses in behalf of _Hel	oresents do authorize you <u>Felen Marie</u> <u>Cherie Duck</u> en Marie Mattei	a, at such tim	e and place as	s you may	appoint
ommissioner, and by these p call before you and examine	oresents do authorize you <u>Felen Marie</u> <u>Cherie Duck</u> en Marie Mattei	a, at such tim	e and place as	s you may	appoint
ommissioner, and by these p call before you and examine witnesses in behalf of _Hel	oresents do authorize you <u>Felen Marie</u> <u>Cherie Duck</u> en Marie Mattei	a, at such tim	e and place as	s you may	appoint
ommissioner, and by these p call before you and examine witnesses in behalf of _Hel	oresents do authorize you <u>Felen Marie</u> <u>Cherie Duck</u> en Marie Mattei	a, at such tim	e and place as	s you may	appoint

Angelo Mattei

,

__ Respondent___

on oath, to be by you administered, upon <u>21 January</u>, <u>1950</u> to take and certify the deposition of the witness and return the same to our Court, with all convenient speed, under your hand.

Witness21 day ofJanuary	1950		
a series de la construcción de la c Construcción de la construcción de l Construcción de la construcción de l	na	and the second s	Juck
			Register.
Commissioner's Fee, \$			

Witness' Fees, \$_____

No. 2416	HE STATE OF ALABAMA Baldwin County	CIRCUIT COURT	HELEN MARTE MATTEI		mt	VS. ANGELO MATTEI		Defendant	MMISSION TO TAKE DEPOSITION		1 1950	WITNESSES; REGISTER		CHERNIE DUCKWORTH	ARTHUR C. EPPERSON	FOLEY, ALARANA
No. 2416	LATE OF A aldwin Co	RCUIT C	LEN MARTE MA			vs. Lo MA			TAKE	HRI	- - -	WITNESSES	MARIE		ARTHUR C. EPP	ATTOCNEY ATTOCNEY

ragaldy francisk para sealt spare to real any an an an angle for the sealt for an angle for an antipation of the sealt spare of the sealt of the sealth for a sealt of the sealth for a s

oor manjal ya yaa pir, Maar wajaayayo shariy		Fig. 1999. A state of the st	
1997 - 1999 - 1997 -	ал и стати у стати с са била стати с стати и сими и ума и у рими и ради и ради и стати.	· · · · · · · · · · · · · · · · · · · ·	
t na ann an tao	n,það ný ný förnda som "sama sagar mangða sagar, samagar sag		λαλομήμ α μα ματικρί το
ים בירו איז	, 1971 - 1970 - 1976 - 1977 - 1970 - 1980 (1980) (1980) (1980) (1980) (1980) (1980) (1980) (1980) (1980) (1980) (1		n an
an shara sharan ar san shara shara sharangan ar sa sharan sharangan ar shi San Sa San Sa			
Successive constants and the second second constants of the second constants of the second second constants of γ			a a sua a sua A sua a s A sua a s
nin a transmusiqui nudanda a sanan na na ana sana sa	· · · · · · · · · · · · · · · · · · ·		n nersen er sen mænne om er ster er sen er en ster en ster for for er sen forsterne forsterne ster er under so I
י אווירי ברבי הידי ביני באני בעני בי הני הווירים ויצע הקוון בי אווירי בעוויור הידי האוויראי האוויר האני בי בי ה	ידי ביני איז אין איין איינער איז		
and a second			
Marked by Anna Andrew Port (1999) and a second			
, Mandaran ka anana sakata kana ka mana ana ana ana ana ana ana ana ana a			
	anaa ahaa ahaa ahaa ahaa ahaa ahaa ahaa	ning and a second se	lander en
1922.11 Oxford 12 Defense Conserva-	of still Sector with		nar an anna an ann an an an an an an an an
		a na garana a sa sangangangangangan ana ang ang ang ang an	
e where we as believed a first and Dealer Course in Believer Coursey.		a na garana a sa sangangangangangan ana ang ang ang ang an	

2012/2022

· · ·

THE STATE OF ALABAMA Baldwin County.

ř

Circuit Court of Baldwin County, Alabama (In Equity)

Complainant

Respondent

HELEN MARTE MATTET

ANGELO MATTET

CATHERINE MASON

as Register and Commissioner .

have called and caused to come before me <u>CHERTE DUCKWORTH</u>

witness_____named in the Requirement for Oral Examination, on the <u>21</u> day of <u>JANUARY</u>, <u>19</u>50 194_____, at the office of <u>CATHERINE MASON</u>

VS.

in _____FOLEY, ALABAMA_____, Alabama, and having first sworn said Witness______ to speak the truth, the whole truth, and nothing but the truth, the said ______CHERTE_DUCKWORTH______

_____ doth depose and say as follows:

My name is Cherie Duckworth. I am over twenty-one years of age and I reside at Robertsdale, Alabama. I am a sister of Helen Marie Mattei.

I remember the last time that Angelo beat up Helen, quite well. It was around the first week in December of last year Helen called me up that Sunday morning on the phone and said that Angelo had beat her up and tried to kill her and wanted me to come up to Loxley. My husband didn't want me to go but I went anyway. Angelo was not there when I got there. Helen's face was all puffed and bruised and one eye was turning black. Helen was very nervous and quite scared. I stayed all of that day and ran the place and also stayed that night as she was afraid Angelo might come back. I went home the next day and a couple of days later she called me again and said that Angelo was back acting funny and would I come up and stay with her because she was afraid Angelo might try to do something serious to her. I went up and stayed with her the rest of the week until Angelo left. Angelo stayed in another cabin while he was there. Helen hasn't had anything to do with Angelo since that night He beat her up so.

 J. J. V.I.6 THE STA BALD BALD IN CIRCUIT HELEN MARI ANGELO 	
	Filed Vol.
	andra 1995 - Angeles Maria, andra andra andra andra andra andra andra andra 1996 - Angeles Angeles andra andr
(ethered Maran (L.S.)	n an
761	
velope to the Register of said Court.	I enclose the said Oral Examination in an en Given under my hand and seal, this 71
to ton me I tent ;	said witness — or had proom made before me of counsel or of kin to any of the parties to said ca
o riterial knowledge of personal identity of	I the time and place herein mentioned; that I said witness
and 212 signed the same in the presence	MOSVH ENTHEBINE WVZOM
was taken down by me in writing in the more	the foregoing deposition
as Register and Commissioner hereby certify that	I, CATHERINE MASON
554	an a
Bellever de de Bellever	ORAL EXAMINATION.
an an anna an an ann an ann an ann ann	(1 + 1) = (1 + 1) + (1 +
and the second	Office of a strategy of a strategy as

-, Register, - Record vs. Complainant -, 194 Respondent. I COURT, IN EQUITY. eposition Page _____ PAGE ATE OF ALABAMA DWIN COUNTY LE MATTEI corded in MATTEI

ORAL DEPOSITION

THE STATE OF ALABAMA

Baldwin County.

Circuit Court of Baldwin County, Alabama (In Equity)

Respondent

HELEN MARTE MATTEI Complainant

VS.

ANGELO MATTEL

CATHERINE MASON

as Register and Commissioner ____

have called and caused to come before me ______ Helen Marie Mattei

witness_____named in the Requirement for Oral Examination, on the <u>20</u> day of <u>January</u> 1940, at the office of <u>Catherine Mason</u>

My name is Helen Marie Mattei. I am thirty-three years of age and have resided in Baldwin County, Alabama for the past ten years and still do. Angelo Mattie, my husband is over the age of twenty-one years and he is a resident of Baldwin County, Alabama.

Angelo Mattie and I were marries on the second of May 1942 in Pascagoula, Mississippi. We do not have any children.

I left my husband on the night of December the third, 1949. That Saturday afternoon Angelo went to Mobile to see aman about doing some hauling up the state for the man. He was suprosed to be back before supper time to help me at the place as Saturday is always our busy day. I closed a little after midnight and he still hadn't come back. I was a little worried but mostly supected the truth, that was that he was fooling with some woman. I don't remember exactly what time it was when he did come in, probably around three o'clock. I asked him where he had been all night and he said none of my dam business. I told him it was and that I was tired of looking after the place trying to make a living while he chased all over the country spending money on fast women who were only making a fool out of him. We got into quite an argument and thenwhen he took his shirt off He had lip stick on his undershirt. I don't remember much of what was said after that but I do know that I told him that if he could do that I gussed I could to as there was plenty of men hanging around. He jumped onme and started beating me with his fists and said he would teach me once and for all where my place was or he would kill me one. He was so mad I believe he would have killed me then if he hadn't have soared me so bad that I got strenghh from somewhere to dump him off of me on to the floor between the bed and the wall just as he started to choke me. I ran out of the cabin and just made it to the next one, which luckily the door had been left open, before he caught me. When I slammed the door It locked and he beat onit and cussed me. He said he would get me later and then in a few minutes I heard his truck drive away. He didn't come back for about three days. I am afraid to let him get close to me. What few nights he has been there since he has stayed in another cabin. I wouldn't stay with him because he is extremly jealous and high tempered. He beat me up prettybad several times before but this was the first time he ever tried to choke me. I

. Helen Marie Mattei

name in the second s		
(i) Construction and the second se	Conservation of the second	
(T' 2')		
(athenne Meren (L.S.)	te transponde la constante de l	
	and a second	
	Given under my hand and seal, this 6	
cause, or any manner interested in the result thereof		
of the identity of said witness	said witnessor had proom made before me	
I have personal knowledge of personal identity of	at the time and place herein mentioned; that	
	myself <u>Catharina Mason</u>	1.1
and and the same in the presence of	of the witnessand read over to	•
on was taken down by me in writing in the words	the foregoing deposition on Oral Examinati	
ertify that hereby certify that	noseM entredtsD ,1	

ORAL EXAMINATION.

--, Register. , 194 . Record Register. Complainant Respondent. IN CIRCUIT COURT, IN EQUITY. **Deposition** THE STATE OF ALABAMA HELEN MARIE MATTEI Page + BALDWIN COUNTY ARTHUR C. EPPERSON Attorney at Law Foley, Alabama PAGE ALLE L. DUCK, Rodiki ANGELO MATTET Recorded in VS. • NO. 2416 Filed _ Vol.

HELEN MARIE MATTEI Complainant

ð

Ő,

ð

õ

CIRCUIT COURT IN EQUITY BALDWIN COUNTY ALABAMA

ANGELO MATTEI Respondent

τs.

AGREEMENT OF PARTIES

WHEREAS, an action for divorce is pending between the parties, and WHEREAS, the parties are desirous of settling the issue relative to the disposition of joint property of the parties without litigation in regards to the same:

IT IS MUTUALLY UNDERSTOOD AND AGREED By and between the parties as follows:

1. That all of the property real and personial pertaining to the place of business located on U. S. Highway No. 90, Loxley, Alabama known as "The Roost", is to be upon the signing of this agreement the entire property of Helen Marie Mattei free from all liens or claims of the respondent, Angelo Mattei.

2. That the Complainant Helen Marie Mattei assumes all responsibility for payment of all debts, liens, or encumbrances on said property, and that the respondent Angelo Mattei is forever freed from all obligations pertaining to said property.

3. That in event of a final decree of divorce is rendered in this cause the terms of this agreement may be incorporated therein:

WITNESS our hands this 18 day of January 1950.

molainent Respondent

AGREEMENT OF PARTIES EXMLAT A No. 2416 ********************************* THE STATE OF ALABAMA BALDWIN COUNTY In Circuit Court, In Equity ALICE J. DUCK, Register ARTHUR C. EPPERSON ATTORNEY AT LAW . FOLEV. ALADAMA HELEN MARIE MATTEI Compleinent JAN 21 1950 Angelo Mattel Respandent ΔS

HELEN MARIE MATTEI Complainant

CIRCUIT COURT IN EQUITY BALDWIN COUNTY ALABAMA

vs.

ANGELO MATTIE Respondent

Now comes the respondent, Angelo Mattei, and for answer to the bill of complaint says as follows:

I. He denies each and every allegation contained in said bill of complaint and demands strict proof of same.

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

Respondent 288 less



HELEN	MARIE MATTEI Complainant.		IN THE CIRCUIT COURT OF
	VS.	X	BALDWIN COUNTY, ALABAMA
ANGELO) MATTEI, Jr.	Ĭ	IN EQUITY.

This cause being submitted for final decree in behalf of the complainant, the complainant offers the following testimony, to-wit:

Original bill of complaint lst. Answer and waiver of respondent 2nđ. Commission to take testimony 3rd. 4th. Oral depositions of Complainants Witness Agreement of parties. 5th. 軍軍軍令部軍軍軍官官官軍軍軍軍軍 gerere occare Solicitor for Comola Deice L. rence Regin



Jusaislamod ISTTAM SIRAM NELEH

AMAHAIA BALDWIN COUNTY

CIRCUIT COURT IN EQUITY

'SA

JuebnogeeA ISTTAM OISONA

•2

:VJIUDE II Saittie vytauod niwbisd to truod tirouit court of Baldwin County,

:ronoH rucy otau swods bas streserg -er Vlultbegser ,iettsM eirsM neleH ,tnanislgmo0 ruoY

Eno-vinewi to egs shi revo at insnituo uov taft

-rem Vilulwsi erew drebrodseA bus dreafsigmod end dear .smsdalA .vjuuoD niwblaS ni zebizer bns sisey eno-vinewi to egs shi ievo si , inebnogsei shi , isttsM oleanA tant thrisidmoo to ilid sint to anilit ent antheserg tran arsay owt mand erom tol stata biss to trabizer abil anod a veed sad fis a resident of said State and County, and has been

-zef biss end tant segrado bus greve thanislymo0 ruoY • € .iqdississim, to may 2, 1942 at Pascagoula, Mississipi.

. Alleed to slil red of regame with bebaests, actended with danger to -mos Iliw en tant beautvoo videnosser ai ena tren brawot toub -nos bus rennem sid mort bus musd lesist provision for stserut plainant sham sad thebrogses that segrads has areve thanisig -moD ;elil to ddlsed ted of regneb ddiw bebnedds nosreg ted no eoneloiv leutos bettimmoo sed tnebnogsef biss tedt ;tasnisig -mos exirts bus tid theed thusses oteredt theuperdus semit pondent did on or shout the 3rd day of December 1949, and many

tol viilidianogset LLs semusas iettaM eitaM neleH tuanisig -mol end tend, the fettem olegna, the progress end to smislo to aneil LLs mort sert isttam siram neleH to vtregorg eritne ent ed of si ,"tsoof edT" as nwon's smsdala, velvol, 00 .oV vewagit .2 .U no betasol aseniaud to eseld of gninistred fanoared bus Lesi Viregorg ent lo LLs themeerse doinw to smret ent vd bus Poered drag a sham bus A dididxE as bedeatds ofered at doidw to vgos a vituio; berwo viregorg of esnereler div interestss ns otal beretae eved taebaogeef bas tasaislamoo tsaT • 7

.VJregord biss of gninistred anoitsgildo Lls mort tasnislymoo end vd beerl reverol si iettsM olegnA trebnogser ent tsat bus vyregorg biss no secnerdmuone to , areit , stdeb Lis to themyso

Ι

Jusaislymoð Solicitor for

The premises considered, your Compleinent makes the said Angelo Mattei a party respondent to this bill of Complaint, and in order that the Compleinent may have the relief herein prayed for, may it please your Honor to cause the State's writ of subpeons to be issued, directed to the said Angelo of compleint, within the time required by law; and that on a final hearing of this cause, that your Honor will enter a decree divorcing your compleinent from the said respondent, the Compleinent the right to remarry, and grantfing the compleinent the right to remarry, and granting the compleinent the right to remarry, and granting the compleinent such other, furthur and different relief ing the compleinent such other, furthur and different relief ing the sour Honor may seem just and proper, and your com-

Complainent avers that this is a reasonable, just and proper agreement and prays the Court in the event a decree of divorce is given in this cause that the Court will decree that the parties keep and abide by the terms of said agreement.

AMAHAJA	ANGELO MATTEI I Inspirate I Inspirate
BALDWIN COUNTY	
CIRCUIT COURT IN EQUITY	IETTAM ELHAN NELEH JUSNISIQMOO 1

This cause coming on to be heard was submitted upon Bill of Complaint, and Testimony as noted by the Register, and upon consideration thereof, the Court is of the opinion that the Complainent 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 HELEN MARIE MARIE MARTEL is forever divorced from the said ANGELO MARTEI for and on accfount of ornelty.

Upon consideration of the written agreement entered into between the Complainant and Respondent touching the property of the marriage, it is further ordered, adjudged and decteed by the Court as follows:

1. That all of the property real and personal pertaining to the place of business located on U. S. Highway No. 90, Loxley, Alabama known as "The Roost", is the property of the Complainant, Helen Marie Mattei, free from all claims of the respondent, Angelo Mattei.

-elties bus themyed for eldell is then settles for payment and settlement of all debts, liens, or encumbrances on said property as her sole property and the respondent Angelo Mattei is forever freed from all obligations pertaining to said property. It is further ordered, adjudged that mither party to this

suit shall **ggain** 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.

Ι

It further ordered and decreed that the Compleinant can

.emen nebism Ted emuser

It is further ordered that Helen Marie Mattei the Complainant pay the cost herein to be taxed, for which execution euse.

.0261 . Ju and 10 Tab Jole sint

Jelles Circuit Court, In Equity

I, Alice J. Duck Register of the Circuit Court of Baldwin County, Alsbama, 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 thas are stated in my office.

ent sint lses bas bash ym ssentiW

•056T

day of

Register of Circuit Court, In Equity.

