

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

LOUISE EULA TURBEVILLE

, Complainant

vs.

AUBREY M. TURBEVILLE

, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Decree Pro Confesso~~ on 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 Louise Eula Turbeville is forever divorced from the said Aubrey M. Turbeville 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 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 Louise Eula Turbeville the Complainant pay the cost herein to be taxed, for which execution may issue.

This \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_

\_\_\_\_\_  
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.

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

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

LOUISE EULA TURBEVILLE

Complainant

vs.

AUBREY M. TURBEVILLE

Respondent

DIVORCE DECREE

## The State of Alabama, Baldwin County

## CIRCUIT COURT, IN EQUITY

LOUISE EULA TURBEVILLE, Complainant

vs.

AUBREY M. TURBEVILLE, Respondent

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The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

LOUISE EULA TURBEVILLE

Complainant

vs.

AUBREY M. TURBEVILLE

Respondent

DIVORCE DECREE

The State of Alabama, Baldwin County

CIRCUIT COURT, IN EQUITY

LOUISE BULA TURBEVILLE, Complainant

vs.

AUBREY M. TURBEVILLE, Respondent

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Cruelty

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Judge Circuit Court, In Equity.

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Register of Circuit Court, In Equity.

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

The State of Alabama  
BALDWIN COUNTY

In Circuit Court, In Equity

LOUISE EULA TURBEVILLE

Complainant

vs.

AUBREY M. TURBEVILLE

Respondent

DIVORCE DECREE

**THE STATE OF ALABAMA**  
Baldwin County.

Circuit Court of Baldwin County, Alabama  
(In Equity)

LOUISE EULA TURBEVILLE

Complainant

VS.

AUBREY M. TURBEVILLE

Respondent

I, LOUISE MORRIS

as Register and Commissioner \_\_\_\_\_ in the above styled cause  
have called and caused to come before me \_\_\_\_\_ Louise Eula Turbeville and Aubrey M.  
Turbeville

witness es named in the Requirement for Oral Examination, on the 23 day of March  
194 50, at the office of Arthur C. Epperson  
in Bay Minette, Alabama, Alabama, and having first sworn said Witness es to speak the  
truth, the whole truth, and nothing but the truth, the said Louise Eula Turbeville and  
Aubrey M. Turbeville doth depose and say as follows:

My name is Louise Eula Turbeville. I am over twenty-one years of age and a resident of Baldwin County, Alabama. The Respondent Aubrey M. Turbeville, is over twenty-one years of age and a resident of Baldwin County, Alabama. The Respondent and I married at Lucedale, Mississippi, on January 30th, 1947. We lived together as husband and wife from time to time, until January 24, 1950.

The Respondent on January 24, 1950, and on the last occasion prior thereto committed actual violence to me by hitting me; that he often threatened me. That the conduct of the Respondent was such as to give me every reasonable apprehension to believe and I did actually believe that if I continued to live with him he would carry out his threats and commit further actual violence upon my person which would necessarily endanger my life and health.

The Respondent and I have once child, Sally Suzette Turbeville, who is now 9 months old. It has been some 6 years since I have lived with my parents who live in White House Fork. I have no place that I can call home. I am presently working in the home of Mr. and Mrs. W. W. Watson, who live at Nocomus, Alabama, and I am receiving \$10.00 per week and board. I have no one with whom to leave my minor child. The Respondent lives at Loxley in Baldwin County, Alabama, with his father and mother. He has a good home for the baby and I am sure that it will be properly cared for. It is my opinion that under the circumstances that the custody of the minor child be awarded to the Respondent, who is willing to assume the responsibility of caring and providing for her. I feel that I am fully able and capable of taking care of myself and do not now, or wish to make any claim against the Respondent for my own support.

Louise Eula Turbeville

Aubrey M. Turbeville, being duly sworn, deposes and says; I am the father of the minor child, Sally Suzette Turbeville. I have a home for the baby at Loxley, in Baldwin County, Alabama. I am fully capable of caring and providing for the baby and think that its custody should be awarded to me. I as respondent in this cause filed a cross bill requesting that the court award the custody of the baby to me. I am agreeable that the Complainant, the mother of the baby visit with it at reasonable times.

Aubrey M. Turbeville

ORAL EXAMINATION.

I, Louise Morris, as Register and Commissioner hereby certify that the foregoing deposition on Oral Examination was taken down by me in writing in the words of the witness es and read over to them and they signed the same in the presence of myself and H. M. Hall at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness es or had proom 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 23 day of March, 1940.

Louise Morris (L. S.)

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

THE STATE OF ALABAMA  
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

LOUISE EULA TURNBULL

vs. Complainant

AUBREY M. TURNBULL

Respondent.

Oral Deposition

Filed 4-3, 1940

Chief Clerk, Register.

Recorded in

Record

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

Register.



THE FOLEY ONLOOKER

BALDWIN NEWS-HERALD

FOLEY, ALA., Febr. 16 1950

## HOWELL PUBLISHING CO.

Alice J. Duck

Bay Minette, Ala.

HIGH QUALITY JOB PRINTING

BROUGHT FORWARD

Febr: 9  
" 16

Legal notice  
for Louise Eulla  
Turberville

2. 63

## LEGAL NOTICE

### NOTICE TO NON-RESIDENT

Louise Eulla Turberville, Complainant, vs. Aubrey M. Turberville, Respondent.

In the Circuit Court of Baldwin County, Alabama, in Equity.

To Aubrey M. Turberville, Respondent:

You are hereby notified that Louise Eulla Turberville did on the 7th day of February, 1950, file in this court a bill of complaint against the above named Aubrey M. Turberville, and you are hereby required to answer or demur by the 8th day of March, 1950, to the bill of complaint or in thirty days thereafter a decree pro confesso may be taken against the said respondent.

This the 7th day of February, 1950.

ALICE J. DUCK,  
Register of the Circuit Court.  
ARTHUR C. EPPERSON,  
Foley, Ala., Solicitor for the  
Complainant. 2-9-4t

## AFFIDAVIT OF PUBLICATION

I, M S Lawrence

Editor

\_\_\_\_\_ of The Onlooker, published at  
Foley, Ala., do solemnly swear that a copy of the above notice,  
as per clipping attached, was published once each week in the  
regular and entire edition of said newspaper, and not in any  
supplement thereof, for Two consecutive weeks, com-

mencing with the issue dated Feb. 9, 1950, and

ending with the issue dated Feb. 16, 1950.

M. S. Lawrence

Subscribed and sworn to before me this 17 day  
of February, 1950.

[Signature]  
Notary Public.

MY COMMISSION EXPIRES AUGUST 14, 1951

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA

Baldwin County

Circuit Court

TO:

*Louise Morris*

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

*Enla Louise Subberville*  
*Gubrey M. Subberville*

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

*Louise Enla Subberville*

and

*Gubrey Subberville*

Complainant

Respondent

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 *23<sup>rd</sup>* day of *March*, 194*5* *0*

*Archie W. Wicks*

Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. 2427

THE STATE OF ALABAMA  
Baldwin County

CIRCUIT COURT

Inverville

Complainant

vs.

Inverville

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

WITNESSES:

LOUISE EULLA TUBERVILLE

COMPLAINANT

VS.

AUGUST M. TUBERVILLE

RESPONDENT

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 2127

Now comes the Respondent and for answer to the Bill of Complaint heretofore filed in this cause, says:

1. He denies each and every allegation therein contained not herein specifically admitted and demands strict proof of the same.

2. He admits that the Complainant is over twenty-one years of age, but denies that she is a resident of Baldwin County, Alabama, but on the contrary is a resident of the State of Florida.

3. He admits the allegation of paragraph two, that he and the Complainant married in Lucedale, Mississippi, on January 30th, 1947.

4. He admits the allegations contained in paragraph three and demands strict proof of the same, and further answering to the third count of the Bill of Complaint, he says that on January 24th, 1950, he and the Respondent were residents of the State of Florida and not of the State of Alabama.

4. And further answering the said Bill of Complaint, the Respondent says that while he and the Complainant were living in the State of Florida the Respondent voluntarily abandoned his bed and board and that she has remained away voluntarily and continuously since that time.

5. That Respondent, for further answer, says that he and the Complainant have one child, a minor nine months old; that the Complainant has the child with her in the State of Florida; that conditions in the home in which the Complainant is living or not conducive to the best welfare and interest of the said minor child.

  
Solicitor for Respondent

RECORDED

LOUISE EULLA TUBERVILLE

COMPLAINANT

VS.

AUBREY M. TUBERVILLE

RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

NO. 2427

In law office of Hubert M.  
Hall,

Dated this day of March, 1950.

FILED

MAR 10 1950

ALICE J. BUCK, Register

Louise Lula Turberville

vs.

Aubrey M. Turbeville

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, \_\_\_\_\_

~~Bill of Complaint, Respondent's Answer, Complainant's Testimony.~~

and in behalf of Defendant upon \_\_\_\_\_

*Arthur C. Epson*  
attorney for Complainant

Register.

*Recd. check*

No. ....

**THE STATE OF ALABAMA**  
**Baldwin County**

**IN EQUITY**  
**Circuit Court of Baldwin County**

Louise Eula Turbeville

vs.

Aubrey M. Turbeville

**NOTE OF TESTIMONY**

Filed in Open Court this 3rd .....

day of April, 1948

W. J. [Signature]  
Register.

Printed By The Baldwin Times



EX PARTE

SALLY SUZETTE TURBERVILLE

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA.

TO THE HONORABLE TELEAIR J. MASHEURN, Jr., JUDGE OF THE CIRCUIT  
COURT OF BALDWIN, COUNTY, ALABAMA:

This matter coming on to be heard on the petition of Louise E. Turberville, for habeas corpus, and upon return of Aubrey Turberville as father of said infant to the writ of habeas corpus issued by this court, and it appearing to the undersigned Judge that the said infant's interest and welfare should be considered in the matter, and being considered should be in the care, custody and control of the petitioner, their mother.

IT IS THEREFORE, ORDERED AND ADJUDGED BY THE UNDERSIGNED JUDGE that the petition for the writ of habeas corpus be and the same is hereby granted, and the infant subject of said petition is hereby placed in the care, custody and control of their mother, Louise E. Turberville until further notice and that the father, Aubrey Turberville is granted the right to see her at reasonable times and reasonable hours and that the father pay the costs in this habeas corpus proceedings.

Dated at Bay Minette, Alabama, this 8<sup>th</sup> day of March, 1950.

Teleair J. Masheurn, Jr.  
Circuit Judge

RECORDED

Filed 3-8-50  
Alice J. Weller  
Registrar

EX PARTE

SALLY SUZETTE TURBERVILLE

IN THE CIRCUIT COURT OF BALDWIN  
COUNTY, ALABAMA.

TO THE HONORABLE TELFAIR J. MASHBURN Jr., Judge of the Circuit Court of  
Baldwin County, Alabama:

The petition of Louise E. Turberville, who is over the age of twenty-one  
years and who is a resident citizen of Baldwin County, Alabama, respectfully  
represents and shows to your Honor:

First.

That she is the Mother of Sally Suzette Turberville, who is now restrained  
in the custody of Aubrey Turberville, illegally.

Second.

That the child of foresaid is of tender years being of eight months of age  
and that the proper party to have the custody of said child would be the mother  
your petitioner, and that such restraint is against the welfare of said child ~~inasmuch~~  
inasmuch as said child was taken from your Petitioner's custody and control by force  
and against the will and wishes of your said Petitioner.

Third

That the child was taken by force, intimidation and in a threatening manner  
on to-wit: 2 day of March, 1950

Fourth

That the said Sally Suzette Turberville is the fruit of a marriage between  
your Petitioner and the said Aubrey Turberville and that the said Aubrey Turberville  
is over twenty-one years of age. that the said infant is in the custody and control  
of the named Aubrey Turberville, at Loxley, Alabama.

Your Petitioner prays that a Writ of habeas corpus be issued, directed to said  
Aubrey Turberville, commanding him to bring the body of the said infant before  
your Honor at such time and place to be by you appointed, together with the cause  
of the infants detention

Louise Turberville  
Petitioner

STATE OF ALABAMA  
COUNTY OF BALDWIN

Before me Alice J. Duck, personally appeared Louise E Turberville, Petitioner  
above named, who first by me being duly sworn doth depose and say that the facts sta-  
tuted in said petition are true.

Louise Turberville  
Petitioner

Sworn to and subscribed before me this 3rd day of March 1950

Alice J. Duck

STATE OF ALABAMA

BALDWIN COUNTY,

CIRCUIT COURT

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to have the body of Sally Suzette Turberville, alleged to be detained by Aubrey Turberville with the cause of such detention, before me Telfair J. Mashburn, Jr., Judge of the Circuit Court of Baldwin County, Alabama, on the 4<sup>th</sup> day of March at the Court House at Bay Minette, Alabama, at 11:00 A.M. to do and receive what shall then and there be considered concerning the said Sally Suzette Turberville.

Dated this the 3 day of March 1950.

Telfair J. Mashburn, Jr.  
Circuit Judge.

STATE OF ALABAMA

BALDWIN COUNTY

To any Sheriff of the State of Alabama:

You are hereby commanded to serve a copy of the above and foregoing writ on Aubrey Turberville by delivering a copy of said writ to them, and by showing the original if demanded.

CLERK OF COURT

Witness my hand this, the 3rd day of March 1950.

Bessie H. Hester  
Circuit Clerk

Executed 3-3-50

By serving copy of the  
Within writ on  
Ambrey Tuberville

Taylor Wilkins Sheriff  
H F Hall D.S.

County

RECORDED  
2427

Tuberville

LOUISE EULLA TURBERVILLE

Complainant

VS.

AUBREY M. TURBERVILLE

RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

In this cause, it appearing to the Register from the affidavit of Arthur C. Epperson, Solicitor for the complainant, that the residence and post office address of the respondent AUBREY M. TURBERVILLE are unknown and that he conceals himself so that process can not be served and further that in the belief of the affiant, the respondent AUBREY M. TURBERVILLE is over the age of twenty-one years, it is therefore ordered by the register that publication be made once a week for four consecutive weeks, in the Onlooker, a newspaper published in Baldwin County, Alabama, requiring the said AUBREY M. TURBERVILLE to plead, answer or demur to the bill of complaint in this cause by the 8th day of March, 1950, or, in default thereof, thirty days thereafter a decree pro confesso may be taken against the said respondent.

Done at office this the 7th day of February 1950.

Alice J. Dush  
Register

RECORDED

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

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

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

LOUISE EULLA TURBERVILLE  
COMPLAINANT

VS.

AUREY M. TURBERVILLE  
RESPONDENT

ORDER OF PUBLICATION

FILED

FEB 7 1950

ALICE J. QUACK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

LOUISE EULLA TURBERVILLE  
Complainant

VS.

AUBREY M. TURBERVILLE  
Respondent

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

TO AUBREY M. TURBERVILLE, Respondent:

Your are hereby notified that LOUISE EULLA TURBERVILLE did on the 7th day of Febuary, 1950, file in this court a bill of complaint against the above named AUBREY M. TURBERVILLE and you are hereby required to answer or demur by the 8th day of March 1950, to the bill of complainant or in thirtydays thereafter a decree pro confesso may be taken against the said respondent.

This the 7th day of Febuary, 1950.

Alice J. Duck  
Register of the Circuit Court

ARTHUR C. EPPERSON  
FOLEY, ALABAMA  
SOLICITOR FOR THE COMPLAINANT



RECORDED

No. 2427

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

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LOUISE EULLA TURBERVILLE  
COMPLAINANT  
VS.

AUBREY M. TURBERVILLE  
RESPONDENT

---

NOTICE TO RESPONDENT

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FILED

FEB 8 1950

ALICE J. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

LOUISE EULLA TURBERVILLE  
Complainant

VS.

AULREY M. TURBERVILLE  
Respondent

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

Before me, Alice J. Duck, Register of said Court, personally appeared Arthur C. Epperson, who being first duly sworn, deposes and says that he is Solicitor of Record in the above entitled cause and the respondent in the above stated cause conceals himself so that process can not be served and that his place of residence is unknown, his last known address being, Foley, Alabama, and that his place of residence can not be ascertained after reasonable effort, and further, that in the belief of said affiant the said respondent is over the age of twenty-one years.

Arthur C. Epperson

Sworn to and subscribed before me this the 7th day of  
February, 1950.

Alice J. Duck  
Register.

No. 2427

RECORDED Page

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

LOUISE EULLA TURBERVILLE  
COMPLAINANT

VS.

AUBREY M. TURBERVILLE  
RESPONDENT

AFFIDAVIT

FILED

FEB 7 1950

AUZE L. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

LOUISE SULLA TURBERVILLE

Complainant

vs.

AUBREY M. TURBERVILLE

RESPONDENT

IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA

IN EQUITY

In this cause, it appearing to the Register from the affidavit of Arthur C. Epperson, Solicitor for the complainant, that the residence and post office address of the respondent AUBREY M. TURBERVILLE are unknown and that he conceals himself so that process can not be served and further that in the belief of the affiant, the respondent AUBREY M. TURBERVILLE is over the age of twenty-one years, it is therefore ordered by the register that publication be made once a week for four consecutive weeks, in the Onlooker, a newspaper published in Baldwin County, Alabama, requiring the said AUBREY M. TURBERVILLE to plead, answer or demur to the bill of complaint in this cause by the 8th day of March 1950, or, in default thereof, thirty days thereafter a decree pro confesso may be taken against the said respondent.

Done at office this the 7th day of February 1950.

*Archie J. Epperson*  
Register

No. 2427

Page \_\_\_\_\_

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

LOUISE EULLA TURBERVILLE  
Complainant

VS,

AUBREY M. TURBERVILLE  
Respondent

ORDER OF PUBLICATION

FILED

FEB 7 1950

ALICE J. DUCK, Register

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
FOLEY, ALABAMA

LOUISE EULLA TURBERVILLE  
Complainant

VS.

AUBREY M. TURBERVILLE  
Respondent

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

In this cause, it appearing to the Register from the affidavit of Arthur C. Epperson, solicitor for complainant, that the residence and post office address of the respondent AUBREY M. TURBERVILLE are unknown and that he conceals himself so that process can not be served and further that in the belief of said affiant, the respondent AUBREY M. TURBERVILLE is over the age of twenty-one years, it is therefore ordered by the Register that publication be made once a week for four consecutive weeks, in the Onlooker, a newspaper published in Baldwin County, Alabama, requiring the said AUBREY M. TURBERVILLE to plead, answer or demur to the bill of complaint in this cause by the 8th day of March, 1950, or, in default thereof, thirty days thereafter a decree pro confesso may be taken against said respondent.

Done at office this the 7th day of February, 1950.

Register.

No. 2427

Page \_\_\_\_\_

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
IN EQUITY

LOUISE EULLA TURBERVILLE  
Complainant

vs.

AUBREY M. TURBERVILLE  
Respondent

ORDER OF PUBLICATION

FILED  
7 1950

ARTHUR C. EPPERSON  
ATTORNEY AT LAW  
POLEY, ALABAMA

LOUISE EULLA TURBERVILLE  
Complainant

VS.

AUBREY M TURBERVILLE  
Respondent

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

To the Honorable Telfair J. Mashburn Jr., Judge of the Circuit Court  
of Baldwin County, Alabama, Sitting in Equity:

Your complainant LOUISE EULLA TURBERVILLE, respectfully represents  
and shows unto your Honor:

1. That the complainant is over the age of twenty-one years and  
is a resident of said County and State, and has been a Bona fide  
resident of said state for more than one year next preceding the  
filing of this bill of complainant: that the respondent AUBREY M.  
TURBERVILLE is over the age of twenty-one and that his present res-  
idence is unknown, his last known address being Foley, Alabama.

2. That your complainant and respondent were lawfully married  
on or about, to-wit 30 January, 1947, at Lucedale, Mississippi.

3. Your complainant avers and charges that the said respondent  
did on or about the to-wit, 24th day of January, 1950, and many  
times previously thereto assault, strike, and beat the 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 and health.

The premises considered, your complainant makes the said AUBREY  
M. TURBERVILLE a party respondent to this bill of complainant, and  
in order that complainant may have the relief herein prayed for, may  
it please your Honor to cause the State's writ of subpoena to be issued,  
directed to the said AUBREY M. TURBERVILLE, commanding him to answer  
plead or demur to this bill of complaint within the time required by law;  
and on a final hearing of this cause, that your Honor will enter a decree  
divorcing your complainant from said respondent, granting the complainant  
the right to remarry and the right to resume her maiden name; and that  
your Honor will grant such other, further, and different relief as unto  
your Honor may seem just and proper, and your Complainant will ever pray.

S *Arthur C. Epperson*  
Attorney for Complainant



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MEMBER: SOUTH BALDWIN CHAMBER OF COMMERCE

Dear Mr. Duck 2/8/50

I have already given the  
onlooker the notice to be  
published and the first notice  
appeared to-day. Please file  
these as of the 7<sup>th</sup> of  
Feb. I expected to mail them  
up to you Monday but was  
delayed - (no cash) I am enclosing  
a check for \$20.00 to cover costs. I  
hope that is enough.

Sincerely

Arthur E.