

LE CLA	WHITE JUNES.	Complainant
	VS	
PA	UL ARNOLD JONES.	Respondent
		•
	the state of the s	n Bill of Complaint, Moorees BrayConfesso
on Answer & walver consideration thereof, the Cou for in said bill.	and Tes ort is of the opinion that the	stimony as noted by the Register, and upor Complainant is entitled to the relief prayed
It is therefore ordered, a ofore existing between the	djudged and decreed by the Complainant and Defendar	e Court that the bonds of matrimony here at be, and the same are hereby, disolved
and that the said <u>Leol</u> s forever divorced from the		
,	aul Arnold Jones.	
for and on account of	Abandonment.	
	Annual Communication of the Co	
within sixty days, neither pa appeal.  It is further ordered tha	rty shall again marry excep	of this decree, and that if appeal is taken to each other during the pendency of said and Faul Arnold Jones, rriage upon the payment of the cost of
his suit.	<del>-</del>	
It is further ordered tha	t <u>Leole White Jones</u>	
he <b>Respondant</b> p	ay the cost herein to be tax	ked, for which execution may issue.
This 4 m day of	March.	,19 44.
<b>.</b>		9. W. Harl
		Judge Circuit Court, in Equity.
		, Register of the Circui
,	foregoing is a correct of Judge of the Circuit C decree is on file and e	anty, Alabama, do hereby certify that the copy of the original decree rendered by the court in the above stated cause, which said nrolled in my office.
	Witness my hand	and seal this theday
	of	, 19
·	, F	Register of Circuit Court, in Equity.

The State Of Alabama Page

In Circuit Court, In Equity Baldwin County 

DIVORCE DECREE

Respondent.

vs. Complainant.

Leola White Jones,
Complainant,
IN THE CIRCUIT COURT
VS
OF BALDWIN COUNTY, ALABAMA.
IN EQUITY.
Paul Arnold Jones,
Respondent.

### APPLICATION FOR ORAL EXAMINATION

Now comes the complainant by H. E. Smith, solicitor of record, and makes application to the clerk of said court to issue a commission to take the testimony in said cause, on oral examination, of the following testimony in said who reside in said county, viz:

Name of witnesses: Leola White Jones Verda Mingus Residence of witnesses:
Bay Minette, Alabama
Bay Minette, Alabama

And complainant suggests the name of Mary S. Dubuisson, who resides at Bay Minette, in said county, as a suitable person to be appointed commissioner to take the testimony of said witnesses.

This 311 day of March, 1944.

Solicitor for Complainant.

WITNESS' FEES, \$\_\_

# The State of Alabama, Baldwin County

### CIRCUIT COURT

To Mary S. Dubuisson			
			:
			<del></del>
			•
KNOW YE: That we, having full faith in you	r prudence and compete	n <b>cy, ha</b> ve appointed	you Com-
missioner, and by these presents do authorize you, at su	ich time and place as you	ı may appoint, to cal	ll before you
and examine Leola White Jones, and Ver			
and examine.	<u> </u>		
Tanla Wilefto Towns			
as witnesses in behalf of Leola White Jones		in a cause pending in	n our Circuit
Court of Baldwin County, of said State, wherein	Leola White Jone	S	
	•		
		·····	
-	ASSESSED		· •
		Com	ıplainant
and Paul Arnold Jones			
and			
			Defendant,
on eath to be by you administered, upon	oral examinat	ion	
to take and certify the deposition of the witness	and return the same to	our Court, with a	i convenient
speed, under your hand.			
Witness 3rd day of March	19 44		
	R	Duch	
	and the same of th	ر المراحد المحمد الم	REGISTER
COMMISSIONER'S FEE, \$			

Leela White Jones, Complainant,

V8

Paul Arnold Jones, Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY.

### ANSWER OF RESPONDENT

Now comes the respondent, Paul Arnold Jones, and for answer to the bill of complaint filed against him in the above entitled cause, he denies each and every allegation of the said bill of complaint and demands strict and legal proof thereof.

And respondent does hereby waive all notice of the filing of the said bill of complaint and further waives all service thereof, and further waives all notice of the taking of testimony in said cause and of the submission of said cause for final decree.

Paul Alone Respondent.

Hond Withow A Che. UN NO. Leola White Jones, Complainant,

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Paul Arnold Jones, Respondent. IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA. IN EQUITY.

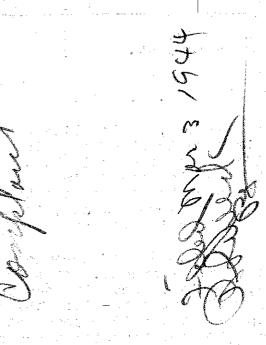
TO THE HONORABLE F. W. HARE, JUDGE OF SAID COURT, IN EQUITY:

Your orator, Leola White Jones, respectfully represents that she is a resident of Baldwin County, Alabama, and has been a bona fide resident of said state and county for more than one year next preceding the filing of this her bill of complaint, that she is over the age of twenty-one years, and that the respondent, Paul Arnold Jones, is over the age of twenty-one years and resides in said state and county.

on the 19th day of December, 1942, your orator was married to the respondent, the said Paul Arnold Jones, in Pensacola, Florida, Escambia County, and that they lived together as man and wife until to-wit: the 15th day of January, 1943, Your orator and the said respondent have not lived together as man and wife or otherwise since said last date. On said last date respondent voluntarily abandoned the bed and board of complainant. That said abandonment occurred more than one year next preceding the filing of this, your orator's bill of complaint.

WHEREFORE, the premises considered, your orator prays that a summons be issued directed to the said respondent, Paul Arnold Jones, requiring him to appear, and plead, answer or demur to this your orator's bill of complaint within the time required by law; and that upon a final hearing your Honor will grant to your orator a decree of absolute divorce from the said Faul Arnold Jones, with permission to your orator to again marry should she see fit to do so, and that such other relief may be granted to your orator as your Honor may deem proper, the premises considered.

Solicitor for Complainant.



Dan 28

1076 RECORD

## THE STATE OF ALABAMA Baldwin County

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

	Leola White Jones	COMPLAINANT
•	. vs.	
	Paul Arnold Jones	RESPONDENT
T	Mary S. Dubuisson	
I,		•
Registeran	Commissioner	
	Taole Whit	e Tones and Venda Wingus
ve called an	d caused to come before meLecla Whit	e somes and verda wingus
·		
	amed in the requirement for Oral Examination e office of H. E. Smith, attorney-	
'4, al ,till	e office of	
Bay Mi	nette, , Alabama, and having firs	st sworn said witness es to speak th
uth, the who	le truth, and nothing but the truth, the said —	Leola White Jones
	doth depose	and say as follows:
y name is	Leola White Jones. I am a res	ident of Baldwin County,

My name is Leola White Jones. I am a resident of Baldwin County, Alabama, and have been a bona fide resident of said state and county for more than one year next preceding the filing of my bill of complaint, in this cause. I am over the age of twenty-one years and the respondent, Paul Arnold Jones, is over the age of twenty-one years and resides in said state and county.

On the 19th day of December, 1942, I was married to the respondent, the said Faul Arnold Jones, in Pensacola, Escambia County, Florida, and we lived together as man and wife until January 15, 1943. I and the said respondent have not lived together as man and wife or otherwise since said last date. On said last date, the respondent voluntarily abandoned my bed and board. The said abandonment occurred more than one year ago next preceding the filingiof my bill of complaint in this cause. He did not have any cause for leaving me, as I always treated him the best I could. He just became dissatisfied and without any cause went off and left me and has never returned. I did not consent to the separation and tried to get him to come back but he would not do so. I therefore charge him with voluntary abandonment for more than one year next preceding the filing of my bill of complaint in this cause.

Lools. White dans a

I, Mary S. Dubuisson 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 witnesses and read over to then and they signed the same in the presence of my-
self and H. E. Smith, solicitor for complainant,
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.
3rd Jones March 1944
Given under my hand and seal, this day of Sulviviose (L. S.)
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STATE OF ALABAMA, BALDWIN COUNTY  COMPLAINA  VS.  RESPONDE  RECORDED IN  Regis  Recorded in  Regis  Regis

DEPOSITION

RESPONDENT

COMPLAINANT

\_Record

, Register.

, Register

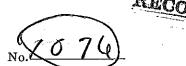
#### DEPOSITION OF VERDA MINGUS.

Being first by me duly sworn, testified as a witness in behalf of complainant as follows:

"My name is Verda Mingus. I have known Leola White Jones, the complainant in this cause, and Paul Arnold Jones, the respondent, for many years and remember when they got married in December of 1942, I remember when they separated in January, 1943. I have seen the complainant almost every day since the separation, and know that they have not lived together as man and wife, or otherwise, since January 15, 1943. I did not know of any reason why the respondent should have abandoned the complainant, except that he just became dissatisfied and left. She has been working and making her own living since they separated, which was more than one year before the bill of complaint was filed in this cause. I know that she treated him well and as a dutiful wife should have, and as I stated before, his abandonment of her was without fault on her part, and without her consent. The said abandonment occurred at Perdido, Baldwin County, Alabama. I am a resident of Baldwin County, Alabama, and have been for many years."

Verda Mugus

Leola White Jones	THE STATE OF ALABAMA,  BALDWIN COUNTY
VS. Paul amold Jones	IN EQUITY  CIRCUIT COURT OF BALDWIN COUNTY
This cause is submitted in behalf of Complainant auswer and waive of witnesses for complainant	respondent oral depositions amount, namely: Leola White
Jones and Verda n	ringus
nd in behalf of Defendant upon	



### The State of Alabama,

BALDWIN COUNTY

### IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Jones

VS.

NOTE OF TESTIMONY

Filed in Open Court this

day of\_

\_194<u>\</u>

Register.

Moore Printing Co.