

1076

The State Of Alabama, Baldwin County  
CIRCUIT COURT, IN EQUITY

LEOLA WHITE JONES. Complainant

VS

PAUL ARNOLD JONES. Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, ~~Records Pro Confesso~~ on Answer & 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 Leola White Jones, is forever divorced from the said

Paul Arnold Jones.

for and on account of Abandonment.

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 Leola White Jones. and Paul Arnold Jones, be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Leola White Jones, the Respondant pay the cost herein to be taxed, for which execution may issue.

This 4th day of March, 19 44.

J. W. Hare

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. 1026 Page

**The State Of Alabama**

Baldwin County

In Circuit Court, In Equity

vs. Complainant.

Respondent.

**DIVORCE DECREE**

Leola White Jones,  
Complainant,  
vs  
Paul Arnold Jones,  
Respondent.

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

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:	Residence of witnesses:
Leola White Jones	Bay Minette, Alabama
Verda Mingus	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 3rd day of March, 1944.

H. E. Smith  
Solicitor for Complainant.

The State of Alabama, }  
Baldwin County

CIRCUIT COURT

To Mary S. Dubuisson

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 Leola White Jones, and Verda Mingus

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

\_\_\_\_\_ Complainant  
and Paul Arnold Jones

\_\_\_\_\_ 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 3rd day of March 19 44

*R. R. [Signature]*

REGISTER

COMMISSIONER'S FEE, \$ \_\_\_\_\_

WITNESS' FEES, \$ \_\_\_\_\_

Leola White Jones, )  
Complainant, )  
vs )  
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 Jones  
Respondent.

Floyd Withrow  
A.C.C. W.N.R.

Leola White Jones,  
Complainant,

vs

Paul Arnold Jones,  
Respondent.

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

H. E. Smith  
Solicitor for Complainant.

1076

James  
J. Jones

Complaint

1944

James  
J. Jones

RECORDED

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Grant

Grant

Admission

File 1003/049  
Bureau  
of



1076

James  
91

James

Apprentice - James  
Dad Grantham

James  
1944  
Dad Grantham

THE STATE OF ALABAMA }  
Baldwin County }

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

Leola White Jones COMPLAINANT

vs.

Paul Arnold Jones RESPONDENT

I, Mary S. Dubuisson

as ~~Register and~~ Commissioner

have called and caused to come before me Leola White Jones and Verda Mingus

witness<sup>es</sup> named in the requirement for Oral Examination, on the 3rd day of March

1944, at the office of H. E. Smith, attorney-at-law,

in Bay Minette, Alabama, and having first sworn said witness<sup>es</sup> to speak the

truth, the whole truth, and nothing but the truth, the said Leola White Jones

doth depose and say as follows:

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 Paul 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 filing of 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.

*Leola White Jones*

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 witness<sup>es</sup> and read over to then and they signed the same in the presence of myself 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<sup>es</sup> or had proof made before me of the identity of said witness<sup>es</sup>; 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 3rd day of March 1944.

Mary S. Dubuisson (L. S.)

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**THE STATE OF ALABAMA,**  
BALDWIN COUNTY

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IN CIRCUIT COURT, IN EQUITY

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COMPLAINANT

vs.

RESPONDENT

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**ORAL DEPOSITION**

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Filed Mar 3, 1944

RECORDED IN \_\_\_\_\_, Register.

Record \_\_\_\_\_

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

\_\_\_\_\_, 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 Mingus

*Leola White Jones*

THE STATE OF ALABAMA,  
BALDWIN COUNTY

VS.

*Paul Arnold Jones*

IN EQUITY  
CIRCUIT COURT OF BALDWIN COUNTY

This cause is submitted in behalf of Complainant upon the original Bill of Complaint, \_\_\_\_\_

*answer and waiver of respondent, oral depositions  
of witnesses for complainant, namely: Leola White  
Jones and Verda Mings*

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

*Reed* Register.

**RECORDED**

No.

7076

The State of Alabama,  
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

*Jones*

VS.

*Jones*

NOTE OF TESTIMONY

Filed in Open Court this

*3*

day of

*March* 194*4*

*R. H. Jones*

Register.