

.....Edna Mae Washburn.....
Complainant,
VS.
.....Robert Washburn.....
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.
NO.....

DEMAND FOR ORAL EXAMINATION.

COMES the Complainant, by attorney, and represents to the Court as follows:

1. That the following named witnesses reside within one hundred miles from

.....Bay Minette,....., in the County ofBaldwin.....

Alabama, the place of trial of said cause, to-wit:.....Bay Minette, Alabama.....

.....
.....
.....
.....

2. That said complainant requires an oral examination of said witnesses before a co.
missioner appointed by the Register of this Court.

Beebe & Hall
By: *J. C. Beebe*
Solicitor for Complainant.

NOTE:

Complainant suggests the name of.....Virginia Keel.....

as a suitable and competent person to act as commissioner upon the examination of said witnesses.

Beebe & Hall
By: *J. C. Beebe*
Solicitor for Complainant.

EDNA MAE MASHBURN
COMPLAINANT

VS.

ROBERT MASHBURN
DEFENDANT

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

And now comes the Defendant in his own proper person and accepts service of the summons and complaint in the above styled cause, and denies each and every allegation contained in the bill of complaint, and demands strict proof of the same.

The Defendant waives notice of the time of taking testimony on behalf of Complainant, the right to cross examine Complainant's witnesses, and agrees that this cause be submitted forthwith for final decree without further notice.


Defendant

Witnesses:



The State of Alabama, }
Baldwin County

CIRCUIT COURT

To Virginia Keel

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 Edna Mae Marshburn and L.C. Yussor

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

and Robert Marshburn ^{is} Complainant

is Defendant,

on oath to be by you administered, upon oral examination to take and certify the deposition of the witness of and return the same to our Court, with all convenient speed, under your hand.

Witness 25 day of March 1944

Robert

REGISTER

COMMISSIONER'S FEE, \$ 5.00 Pd.

WITNESS' FEES, \$ none

NO 1084

RECORDED
The State of Alabama

BALDWIN COUNTY

CIRCUIT COURT

Esther Mae Marshburn

Complainant

VS.

Robert M. Marshburn

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Virginia Steel

WITNESSES:

Esther Mae Marshburn

J. C. Duvier

1085
RECORDED

Edna M. M. Scherer

By

Robert M. Scherer

Amner M. M. Scherer

Filed March 20, 1944

R. J. D. Scherer
Register

1084

RECORDED

DEMAND FOR ORAL EXAMINATION.

Etna Mackhouse

Complainant,

Vs.

Robert Mackhouse

Respondent.

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

Filed this *27* day of *March*,

194*4*

R. Ducl

Register.

THE STATE OF ALABAMA }
Baldwin County }

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

EDNA MAE MASHBURN COMPLAINANT

VS.

ROBERT MASHBURN RESPONDENT

I, Virginia Keel

as ~~Register and~~ Commissioner

have called and caused to come before me

Edna Mae Mashburn and Calvin Vinson

witnesses named in the Requirement for Oral Examination, on the _____ day of _____

19____, at the office of Beebe & Hall

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

the whole truth, and nothing but the truth, the said Edna Mae Mashburn

L. C. Vinson doth depose and say as follows:

My name is Edna Mae Mashburn. I am the Complainant in the cause of Edna Mae Mashburn versus Robert Mashburn for divorce in the Circuit Court of Baldwin County, Alabama, in equity. I am 32 years of age and a resident of Baldwin County, Alabama where I have resided all of my life. The Defendant, Robert Mashburn, my husband is 37 years of age. His residence is in Baldwin County but he is now in the military service of the United States. We were married in Mobile, Alabama, on, to-wit: February 28, 1930. We lived together as husband and wife until March 23rd, 1944 and we separated at Bay Minette, Alabama. Robert Mashburn is a man of violent and ungovernable temper and for several years prior to his induction into the service was cruel and inhuman to me. On numerous occasions he became enraged without just cause and without any excuse cursed and abused me and bear me with his fist and at one time threw an electric lamp at me. He has threatened at various times to kill me and I feel that if I should continue to live with him he would do me bodily harm attendant with danger to my life and health. He recently came home on a furlough and is now in Bay Minette. He had only been here a day or two when he flew into one of his fits of anger and but for the intervention of others would have done me bodily harm. We separated and have not lived together since.

L. C. Edna Mae Mashburn
Calvin Vinson, first having been sworn doth depose and say:

My name is Calvin Vinson. I am 42 years of age and I am the brother of Edna Mae Mashburn. They have lived close to us for a number of years and for some time prior to Robert Mashburn going into the service he had been cruel to Edna Mae and on several occasions bear her severely with his fist. He is now in the military service. He came back home on a furlough a few days ago and had only been here a day or two when in a fit of anger he beat her severely about the face and body, and if she should continue to live with him he would do her bodily harm attendant with danger to her life and hearth. They are both over the age of 21 years and live in Baldwin County, Alabama.

L. C. VINSON

ORAL EXAMINATION

I, Virginia Keel, 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 them and They signed the same in the presence of myself J. C. Beebe, Attorney for Complainant at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness or had proof made before me of the identity of said witness; 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 25 day of March, 1944
Virginia Keel (L. S.)

No. 1082 Page _____

THE STATE OF ALABAMA
Baldwin County

IN CIRCUIT COURT, IN EQUITY

Edna Mae Maxthum

Complainant

vs.
Robert Maxthum

Respondent

ORAL DEPOSITION

Filed March 25, 1944

Robert Keel, Register

RECORDED IN _____ Record

Vol. _____ Page _____

Register _____, Register

STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY.

No. _____ Term, 194_____

Edna Mae Mashburn, Complainant

Vs.

Robert Mashburn, Defendant

To R. S. Duck, Register

In the above stated cause a Decree Pro Confesso having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by _____

Beebe & Hall Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Beebe & Hall
B. C. Beebe
Solicitor for Complainant.

RECORDED

No. 1084

Page _____

**The State of Alabama,
Baldwin County
CIRCUIT COURT, IN EQUITY**

Edna Mae Mashburn

Vs.

Robert Mashburn

**REQUEST FOR DECREE IN
VACATION**

Filed

March 25

, 1944

Robert

Register.

Recorded in _____

Record _____

Vol. _____

Page _____

Register.

Edna Mae Mashburn

VS.

Robert Mashburn

THE STATE OF ALABAMA,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

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

Note of Testimony, answer and waiver of Defendant and depositions
of Edna Mae Mashburn and Calvin Vinson

and in behalf of Defendant upon _____

R. Deech Register.

RECORDED

No.

1084

The State of Alabama,
BALDWIN COUNTY

IN EQUITY

CIRCUIT COURT OF BALDWIN COUNTY

Edna Mae Markburn

Robert Markburn

VS.

NOTE OF TESTIMONY

Filed in Open Court this 27

day of March 1944

Robert

Register.