

No. 13 Page.....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Jessie Paul

Complainants.

vs.

John D Paul

Defendants.

MOTION FOR DECREE PRO
CONFESSO ON PUBLICATION.

Filed June 25 1917

J. W. Rice

Register.

Recorded in.....Record,

Vol.....Page.....

Register.

2-6

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT, IN EQUITY.

No. Vacation Term, 1917

Jessie Paul

Complainants

vs.

John D. Paul

Defendants

Motion is hereby made for a Decree Pro Confesso against

John D. Paul

Defendant

in the annexed stated cause, on the ground that more than thirty days have elapsed since the perfection of publication was made under the order of this Court; and it having been shown by due proof to the Court that said Defendant is a non-resident of the State of Alabama, and has failed to answer, plead or demur to the Bill in this cause, to the date hereof.

This 25th day of June 1917

W. H. Haukma

Solicitor.

13

THE STATE OF ALABAMA,
Baldwin County.

Jessie Paul
vs.
No. _____
John D. Paul.

CIRCUIT COURT, IN EQUITY.

To the Hon. A. E. Gamble, Judge of the Circuit Court of
Baldwin County, State of Alabama:

THE BILL OF COMPLAINT of Jessie Paul

exhibited in the Baldwin Circuit Court against John D. Paul

humbly complaining, your oratrix shows your Honor as follows:

That your oratrix and John D. Paul, are over the age of 21 years.

That your oratrix is a bona fide resident of the State of Alabama, and has been a bona fide resident of Baldwin County, Alabama for more than three years next before the filing of the bill of complaint in this cause. That your oratrix and defendant, John D. Paul were married on or about August 27, 1906. That on or about November 1st 1913, defendant abandoned your oratrix, voluntarily, without any fault on the part of your oratrix, and defendant has not lived with your oratrix since said separation, but he has lived separate and apart from her since said separation. That when your oratrix heard from him last, he was living at or near Millville, Florida. Plaintiff requests that service be obtained upon the said defendant by registered mail, in accordance with the Act of the the Legislature of 1915, and also by publication, if defendant can not be reached by registered mail.

WHEREFORE, Your said oratrix prays that a Writ of Subpoena may issue to said

John D. Paul commanding him to appear and answer this Bill of Complaint; that John D. Paul be made a party Defendant hereto, and that your Honor will make a decree annulling said marriage, granting your oratrix a divorce, and permitting her to again marry, and as in duty bound she will ever pray.

W. J. Hawkins
Solicitors for Complainant.

NOTE.—The Defendant is required, but not under oath, to answer the above Bill.

W. J. Hawkins
Solicitors for Complainant.

ORIGINAL.

No. 15 Page.....

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Jessie Paul

Plaintiff.....

vs.

John D. Paul

Defendant.....

BILL OF COMPLAINT.

Filed April 4th. 19 17

D. W. Peterson
Register.

W. H. Hawkins.
Plaintiff's Attorney.

Defendant's Attorney.

THE STATE OF ALABAMA,

Baldwin County.

No. 13

CIRCUIT COURT, IN EQUITY.

Jessie Paul

Complainant

vs.

John D. Paul

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso

and testimony as noted by the Register; and, upon consideration thereof, the Court is of 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 the said

Jessie Paul

is forever divorced from the said

John D. Paul

for and on account of

Voluntary abandonment

as alleged in said Bill of Complaint;

It is further ordered, that the said Jessie Paul

be, and she is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said Jessie Paul

pay the costs herein taxed, for which execution may issue, and if such execution is returned "no property found," then execution for such costs may issue against the said John D. Paul

It is further ordered, adjudged and decreed that said Jessie Paul

shall not again marry except to said John D. Paul until sixty days after this date, and that if an appeal is taken within sixty days she shall not marry again except to said John D. Paul during the pendency of said appeal.

This 20th. day of July 1917

[Signature] Judge of the Circuit Court of Baldwin County, Ala.

THE STATE OF ALABAMA,

County.

CIRCUIT COURT, IN EQUITY.

I, Register of said Circuit Court of said County,

Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by said Court on the day of 19, in the cause of

Complainant

vs.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the day of 19

Register.

No. 13

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Baldwin

COUNTY, ALA.

Jessie Paul

vs.

John D Paul

DECREE OF DIVORCE.

Filed in office this

24th

day of

July 1917

T. W. Richardson

Register.

E. O. M.

Recorded on Minutes

THE STATE OF ALABAMA,
Baldwin County.

CIRCUIT COURT OF
Baldwin COUNTY,
IN EQUITY.

To any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon John D Paul,

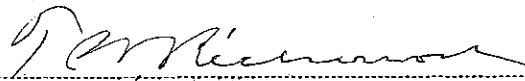
of ~~Alabama~~ County, to be and appear before the Judge of the Circuit Court
of Baldwin County, exercising Chancery jurisdiction, within thirty days after
the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited
by Jessie Paul

against said John D. Paul,

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defend-
ant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your
endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Register of said Circuit Court, this

4th day of April 1917.



Register.

Serve on John D. Paul,

CIRCUIT COURT OF

Baldwin COUNTY,

IN EQUITY.

No. 13.

SUMMONS.

Jessie Paul

*Copy of Complaint
& Summons Mailed
Sept 4/97 by Reg
Mail 4/4 9/7*

vs.

John D. Paul

W.H. Hawkins.

Solicitor for Complainant.

Recorded in Vol. _____ Page _____

THE STATE OF ALABAMA,

Baldwin, County.

Received in office this _____

day of _____ 19____

Sheriff.

Executed this _____ day of _____

19____

by leaving a copy of the within Summons

with _____

Defendant _____

Sheriff.

By _____

Deputy Sheriff.

Jessie Paul

vs.

John D. Paul

CIRCUIT COURT OF

Baldwin COUNTY,
IN EQUITY.

I, F.W. Richerson, Register of said Court. do hereby certify that I
did, on the 4th day of April 1917, send to

John D. Paul Defendant

whose address was Millville, Fla

by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," a copy of the
Bill of Complaint filed in this cause; that I demanded a return receipt addressed to the Register of this Court;
and that such receipt was duly received and filed by me in this cause, on the day of
19 17

Witness my hand, this day of 19 17

No. 13

CIRCUIT COURT OF

Baldwin COUNTY,
IN EQUITY.

Jessie Paul

vs.

John D Paul

CERTIFICATE OF REGISTER AS TO
NOTICE BY REGISTERED MAIL.

Filed in office on this
day of 19..7

Register.

Jessie Paul, Complainant.

THE STATE OF ALABAMA,
Baldwin County.

vs.

IN EQUITY,
CIRCUIT COURT OF

John D. Paul, Defendant.

Baldwin COUNTY.

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
decree pro con fesso, and note of testimony.

and in behalf of Defendant upon

No. 13

THE STATE OF ALABAMA,

Baldwin County.

IN EQUITY,

CIRCUIT COURT OF

Baldwin COUNTY.

Jessie Paul

vs.

John D Paul

NOTE OF TESTIMONY.

Filed in Open Court this 19th

day of July 1947

J. W. Richardson
Register.

No. 13

AFFIDAVIT OF NON-RESIDENCE.

THE STATE OF ALABAMA,

Baldwin County.

CIRCUIT COURT, IN EQUITY.

Junie Paul

vs.

John D Paul

Filed in office 4th day of

Apr 1917

D. W. Richmond
Register.

Jessie Paul.

Complainant.....

vs.

IN EQUITY,
CIRCUIT COURT OF

Baldwin.....

COUNTY.

John D. Paul.

Defendant.....

THE STATE OF ALABAMA,

Baldwin County. }

Personally appeared before me, W. H. Hawkins, a Notary Public ~~Register of said Court,~~

in and for said County and State, Jessie Paul

~~agent of~~ Complainant....., who being duly sworn, deposes and says that he is informed and verily believes that

the Defendant.....in the above stated cause is a non-resident.....of the State of Alabama, and the address of

Defendant.....cannot be ascertained after reasonable effort, but when heard from about two

years ago, he was living at Millville, Fla.

and that said Defendant....., in belief of affiant, over twenty-one years of age.

Jessie Paul
Affiant.

Sworn to and subscribed before me, this 4th day of April 1917.

W. H. Hawkins
Notary Public Register.

THE STATE OF ALABAMA, } No. 13
Baldwin County. } CIRCUIT COURT IN EQUITY.

Jessie Paul Complainant
vs.
John D Paul Defendant

DEPOSITION OF Jessie Paul

By virtue of the appointment to take the Deposition, indorsed in writing on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County,

I, T.W. Richerson, Register of said Court of said County,

have called and caused to come before me Jessie Paul

the witness named in the Interrogatories, and having first sworn the said witness to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

My name is Jessie Paul, I am the Complainant in the cause of Jessie Paul---vs-- John D Paul, I live in Baldwin County, Alabama, and have been a bonafide resident of Baldwin County, Ala, all- for more than ten years next before the filing of the bill in this cause, John D paul the defendant is over the age of 21 years and that John D Paul and I were married about August 27th, 1906. On ~~or~~ about November 1st 1914, John D Paul the Defendant abandoned me voluntarily, without any fault on my part and has not lived with me since said seperation and in no way contributed to my support since said seperation. While we lived together as man and wife I was always a good and dutiful wife to him, and said seperation was entirely without fault on my part, but was voluntarily made by him, I have not heard from or of him in over 2 years at that time I heard that he was living near Millville, Fla.,

Jessie Paul

I, T.W. Richerson the said Register, hereby certify that the foregoing testimony was taken down in writing by myself in the words of the witness, and were read over to her, that she assented, swore to and subscribed the same in my presence, the 19th day of July 1917, at Bay Minette, Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and that I am not of counsel or of kin to any of the parties to said cause, or in any manner interested in the result thereof.

And I enclose the said Deposition, together with the Interrogatories, Direct and Cross, and documents which were deposed to, in an envelope properly indorsed and sealed and placed the same on file in my office.

Given under my hand and seal, this 19th day of July 1917

T.W. Richerson (L. S.)
Register.

WITNESS' FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below :

Witness	Days attendance at \$1.50 per day, \$
.....	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
.....	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
.....	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
.....	Miles traveled at 5 cts. per mile,

REGISTER'S FEES.

Register	Days at \$1.50 per day, \$
.....	Words at 20c per 100,

No. 13 Page

THE STATE OF ALABAMA,
Baldwin County,
CIRCUIT COURT, IN EQUITY.

Jessie Paul
vs.
John D Paul

DEPOSITION TAKEN BEFORE
REGISTER

DEPOSITION OF
Jessie Paul

for

Filed July 19th, 1917.
Published by order of Court,
19

Register.

THE STATE OF ALABAMA, } No. 13.
Baldwin County. } CIRCUIT COURT IN EQUITY.

Jessie Paul Complainant
vs.
John D Paul Defendant

DEPOSITION OF Nancy Taylor

By virtue of the appointment to take the Deposition, indorsed in writing on the Interrogatories by the Solicitor filing the same, in the above stated cause pending in said Court of said County,

I, T.W. Richerson, Register of said Court of said County,

have called and caused to come before me Nancy Taylor

the witness named in the Interrogatories, and having first sworn the said witness to speak the truth, the whole truth and nothing but the truth, the said witness deposes and says as follows:

My name is Nancy Taylor. I know John D Paul and Jessie Paul
I have known Jessie Paul all her life, she is now 27 years old.
I have known John D Paul about ten years . I remember when
Jessie Paul and John D Paul were married, to the best of my recollection it was in August 1906, I remember about the time John D Paul and Jessie Paul seperated , it was about 3 and one half years ago , I do not remember the exact date, after they married I often visited them, sometimes staying 2 weeks with them.
I always found that Jessie Paul deported herself properly and was always a good and dutiful wife and from what I could see and hear John D Paul had no cause to seperate from her and said seperation was wholly without any fault on her part. He has never returned to to live with her as man and wife since said seperation 3 and one half years ago.

Nancy Taylor (handwritten signature)

I, T.W. Richerson the said Register, hereby certify that the foregoing testimony was taken down in writing by myself in the words of the witness, and were read over to her, that she assented, swore to and subscribed the same in my presence, the 19th day of July 1917, at Bay Minette, Baldwin County, Alabama; that I have personal knowledge of, or had proof made before me of the identity of the witness, and that I am not of counsel or of kin to any of the parties to said cause, or in any manner interested in the result thereof.

And I enclose the said Deposition, together with the Interrogatories, Direct and Cross, and documents which were deposited to, in an envelope properly indorsed and sealed and placed the same on file in my office.

Given under my hand and seal, this 19th day of July 1917.
T.W. Richerson (L. S.)
 Register.

WITNESS' FEES.

I hereby certify that the following named witnesses are entitled to the amounts stated below:

Witness	Days attendance at \$1.50 per day, \$
.....	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
.....	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
.....	Miles traveled at 5 cts. per mile,
.....	Days attendance at \$1.50 per day,
.....	Miles traveled at 5 cts. per mile,

REGISTER'S FEES.

Register, Days at \$1.50 per day, \$,
 Words at 20c per 100,

No. 13 Page

THE STATE OF ALABAMA,
Baldwin County.
 CIRCUIT COURT, IN EQUITY.

Jessie Paul
 vs.
John D Paul

DEPOSITION TAKEN BEFORE
 REGISTER
 DEPOSITION OF
Nancy Taylor.

for

Filed July 19th, 19 17.
 Published by order of Court,
 19

Register.

Largest Weekly Circulation in South Alabama

Bay Minette, Ala.,

May 18th, 1917

M

Jessie Paul
vs
John D. Paul

THE BALDWIN TIMES

ABNER J. SMITH, PROPR.

FINE JOB PRINTING. BEST ADVERTISING MEDIUM

PROMPT SERVICE. LOWEST PRICES.

LOCAL AND LONG DISTANCE TELEPHONE

To publishing Notice to Non-Resident in The above case in The Baldwin Times, in issues of April 19th and 26th and May 3rd and 10th, 1917...	\$3.50
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THE BALDWIN TIMES

ABNER J. SMITH, PROPRIETOR

DEVOTED TO THE INTEREST OF BALDWIN COUNTY AND HER PEOPLE

PUBLISHED EVERY THURSDAY

SUBSCRIPTION: \$1.00 PER YEAR IN ADVANCE

ADVERTISING RATES ON APPLICATION

TELEPHONE No. 7, LOCAL AND LONG DISTANCE

BAY MINETTE, ALA.,

AFFIDAVIT OF PUBLICATION

STATE OF ALABAMA,
BALDWIN COUNTY.

ABNER J. SMITH, being duly sworn, deposes and says that he is the PUBLISHER of THE BALDWIN TIMES, a Weekly Newspaper published at Bay Minette, Baldwin County, Alabama; that the notice hereto attached of

Non Resident Notice No. 13

Baldwin County Circuit Court in Equity.

Jessie Paul

vs

John D. Paul

Was published in said Newspaper for 4 consecutive weeks

in the following issues:

Date of first publication	<u>April 19th, 1917</u>	Vol. <u>28</u>	No. <u>9</u>
“ “ second “	<u>April 26th, 1917</u>	Vol. <u>28</u>	No. <u>10</u>
“ “ third “	<u>May 3rd, 1917</u>	Vol. <u>28</u>	No. <u>11</u>
“ “ fourth “	<u>May 10th, 1917</u>	Vol. <u>28</u>	No. <u>12</u>

Subscribed and sworn to before the undersigned

this 2 day of June 1917.

T. W. Richardson
Clerk Circuit Court
Baldwin Co. Ala.

Abner J. Smith
Publisher.

Notice to Non-Resident:
 Jessie Paul vs. John D. Paul. No. 13.
 The State of Alabama, Baldwin
 County, Circuit Court, in Equi-
 ty. This the 19th day of April,
 1917.
 In this cause it being made to ap-
 pear to the Clerk of this Court by
 the affidavit of Jessie Paul that the
 Defendant John D. Paul, is a non-
 resident of the State of Alabama,
 and further, that, in the belief of
 said Affiant the Defendant is over
 the age of 21 years, it is, therefore,
 ordered that publication be made in
 the Baldwin Times, a newspaper
 published in Bay Minette, Baldwin
 County, Alabama, once a week for
 four consecutive weeks, requiring
 him the said John D. Paul to answer
 or demur to the Bill of Complaint in
 this cause, by the 21st day of May,
 1917, or after thirty days there-
 from a decree Pro Confesso may be
 taken against him.
 T. W. Richardson, Register.
 W. H. Hawkins, Atty for Plaintiff.

THE STATE OF ALABAMA,

CIRCUIT COURT, IN EQUITY.

Baldwin

County.

No. 13

Spring

Term, 19 17.

Jessie Paul

Complainant

John D Paul

Defendant

In this cause it appears to the Register..... that the order of publication heretofore made in this cause, was published for four consecutive ~~weeks~~ ^{days}, commencing on the 19th day of April 1917, in the Baldwin Times a newspaper published in Bay Minette, Baldwin Co. Alabama, that a copy of said order was posted at the Court House door in Baldwin County on the 20th day of April 1917, and that another copy was sent by mail on the 19th day of 19....., to.....

And it now further appearing to the Register..... T. W. Richerson..... that the said

John D Paul

having to the date hereof failed to demur, plead to or answer the Bill of Complaint in this cause, it is now, therefore, on motion of Complainant....., ordered and decreed by the Register..... that the Bill of Complaint in this cause be, and it hereby is in all things taken as confessed against the said.....

John D Paul

This 25th day of June 19 17.

T. W. Richerson

Register.

No. 13..... Page.....

THE STATE OF ALABAMA,
Baldwin..... County.

CIRCUIT COURT, IN EQUITY.

Jessie Paul

vs.

John D. Paul

DECREE PRO CONFESSO ON
PUBLICATION.

Issued June 25th, 1917

T. W. Beaman
Register.

Recorded in..... Record

Vol..... Page.....

Register.