

Circuit Court, In Equity

vs.

GOES 115

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

Orpheus N. King Jr.

Complainant

vs.

Audrey King

Respondent

DIVORCE DECREE

FILED
DEC 5 1951
ALBANY, ALA.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons AUDREY KING to appear and plead, answer or demur within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by ORPHEUS N. KING JR., as Complainant and against Audrey King as Respondent.

WITNESS my hand this the ____ day of _____, 1951.

Register

ORPHEUS N. KING JR.

COMPLAINANT

VS

AUDREY KING

RESPONDENT

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

TO HONORABLE TELFAIR J. WASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant Orpheus N. King Jr., respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age, a bona fide resident of Baldwin County, Alabama, and has been all of his life; that the Respondent is over twenty-one years of age, a resident of Baldwin County, Alabama, but presently residing at Rt. 1, Box 255, Woods Frost, Utah.

2.

That your Complainant and the Respondent married at Reno, Nevada, on November 22, 1947, and lived together as husband and wife, until March 19, 1949.

3.


That on March 19, 1949, the Respondent voluntarily abandoned the bed and board of your Complainant, and has remained away voluntarily and continuously since that time.

4.

The Complainant and the Respondent have no children.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Audrey King, party Respondent to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant prays that upon a hearing hereof, your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

no 2708

ORPHEUS N. KING JR.

COMPLAINANT

VS

AUDREY KING

RESPONDENT

BILL OF COMPLAINT

*Cap. 11-1000
H. 11-1000
9-10-57*

Orpheus N. King Jr.

vs.

Andrey King

THE STATE OF ALABAMA
Baldwin County

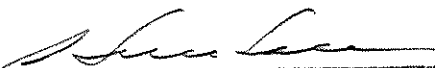
IN EQUITY
Circuit Court of Baldwin County

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

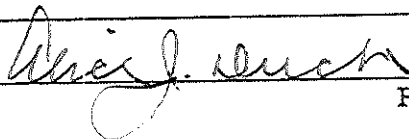
Decree pro confesso on Respondent, and testimony of Orpheus N. King Jr.

and Nora King

and in behalf of Defendant upon _____



Solicitor for Complaintant



Register.

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Deputy King

vs.

Deputy King

NOTE OF TESTIMONY

Filed in Open Court this

4th

day of

Dec

1947

Deputy King
Register.

Printed by The Baldwin Times, Bay Minette.

In the Superior Court of the State of California

IN AND FOR THE
CITY AND COUNTY OF SAN FRANCISCO

Department No. 21

THE ANNEXED INSTRUMENT IS A CORRECT
COPY OF THE ORIGINAL ON FILE IN THE
OFFICE. ATTEST: CERTIFIED

SEP 20 1951

MARTIN MONGAN, COUNTY CLERK OF SAN
FRANCISCO, AND EX-OFFICIO CLERK OF THE
SUPERIOR COURT OF THE STATE OF CALIF-
ORNIA, IN AND FOR THE COUNTY OF SAN
FRANCISCO.

BY J. L. Perusio DEPUTY

AUDREY C. KING,

Plaintiff

vs.

ORPHEUS N. KING,

Defendant

No. 404071

INTERLOCUTORY JUDGMENT OF DIVORCE

This cause came on regularly for trial on the 9th day of May, 19 51,
upon plaintiff's complaint taken as confessed by the defendant, whose default for not answering, after
having been regularly served with summons, has been duly entered, and upon the proof taken it
appears, and the Court finds, that all the allegations of the complaint are true and are sustained by
evidence free from all legal exceptions, and from which the Court finds and determines that a divorce
ought to be granted upon the ground of defendant's extreme cruelty.

Wherefore, it is hereby ORDERED, ADJUDGED AND DECREED that plaintiff is entitled to
a divorce from defendant and that, upon the expiration of one year from the entry of this judgment,
a final judgment be entered herein granting said divorce and restoring said parties to the status of
single persons.

It is further ORDERED, ADJUDGED AND DECREED that defendant
ORPHEUS N. KING pay to plaintiff's attorney VARNUM PAUL the sum
of \$150.00 attorney's fees and pay to plaintiff her costs of
suit incurred herein in the amount of \$15.00.

Done in open Court this 9th day of May, 19 51

MELVYN I. CRONIN

Judge of the Superior Court.

RECORDED

VOL. 886 PAGE 134

MAY 9 - 1951

MARTIN MONGAN, Clerk

By R. D. CARROLL

Deputy Clerk

FILED

May 9 - 1951

MARTIN MONGAN, Clerk

By*** J. L. PERUSIO
Deputy Clerk

CAUTION—This is NOT a judgment of divorce. The parties are still husband and wife and will be until a final judgment
of divorce is entered. This can not be done until one year after the entry of this interlocutory judgment and decree.
Final judgment will not be granted unless requested by one of the parties. A marriage anywhere before the final
judgment of divorce is entered is illegal.

INTERLOCUTORY JUDGMENT OF DIVORCE

Cepheus N. Kings Jr.

Vs.

Audrey King

CIRCUIT COURT OF
Baldwin County.

IN EQUITY

In this cause it being made to appear to the Register that on the 11th
day of September, 1945, a copy of the Bill of Complaint filed in this cause was
sent to Audrey C. King

Defendant, by registered mail, postage prepaid, marked "For delivery only to the person to whom addressed," and return receipt demanded addressed to the Register of this Court; and that on the 1st day of October, 1945, such receipt was duly received and filed in this cause:

And it further appearing to the Register that the said Defendant has failed to plead, answer or demur to the said Bill to the date hereof, it is now, therefore, on motion of Complainant, ordered, adjudged and decreed by the Register that the said Bill of Complaint be, and it hereby is in all things taken as confessed against the said Audrey C. King

This the 26 day of November, 1945
Wingfield Register.

No. _____

CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA

In Equity.

Orpheus N. King Jr.

Vs.

Audrey King

DECREE PRO CONFESSO AFTER
NOTICE BY REGISTERED MAIL

Filed in office this 26th day of
November, 1947
W. J. French, Register

Entered in O. B. _____ Page _____

APPROPRIATE - 601-144

COMMISSION TO TAKE DEPOSITIONS

THE STATE OF ALABAMA
Baldwin County

Circuit Court

TO: Evelyn Watts

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 Orpheus N King Jr, and Nora King

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

Orpheus N. King Jr.

and Andrew King, Complainant

Respondent

on oath, to be by you administered, upon Orpheus N. King, Jr., and Nora King to take and certify the deposition^d of the witness^s and return the same to our Court, with all convenient speed, under your hand.

Witness 1st day of Dec, 1947

Alfred. Leuch
Register.

Commissioner's Fee, \$

Witness' Fees, \$

No. _____

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Complainant _____

VS.

Defendant _____

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Little

WITNESSES:

Orpheus H. King Jr.

Kora King

THE STATE OF ALABAMA
Baldwin County.

Circuit Court of Baldwin County, Alabama
(In Equity)

Orpheus N. King Jr.

Complainant

VS.

Audrey King

Respondent

I, Evelyn Watts

as Register and Commissioner

have called and caused to come before me Orpheus N. King Jr. and Nora King

witness as named in the Requirement for Oral Examination, on the 1st day of December
194 51, at the office of Hubert M. Hall

in Bay Minette, Alabama, and having first sworn said Witness as to speak the
truth, the whole truth, and nothing but the truth, the said Orpheus N. King Jr., and
Nora King doth depose and say as follows:

My name is Orpheus N. King, Jr., I am over twenty-one years of age and a bona fide resident of Baldwin County, Alabama, and have been all my life. The Respondent is over twenty-one years of age and a resident of Baldwin County, Alabama, my home, but is presently residing at Route 1, Box 255, Woods Cross Utah.

The Respondent and I married at Reno, Nevada, on November 22, 1947. I was out there at that time having just finished a period of service in the Navy. The Respondent and I lived together as husband and wife until March 19, 1949.

The Respondent on March 19, 1949, voluntarily abandoned my bed and board and has remained away voluntarily and continuously since that time.

The Respondent and I have no children and no community property.

The Respondent has refused absolutely to live with me.

Orpheus N. King Jr.

My name is Nora King. I am the mother of the Complainant in this cause. I know of my own personal knowledge that the Complainant and the Respondent have not lived together as husband and wife for more than one year next preceding the filing of the bill of complaint in this cause.

The Complainant and the Respondent have no children and no community property.

The Complainant lives in the home with me and his father.

Nora King

ORAL EXAMINATION.

I, Evelyn Watts, 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 as and read over to them and they signed the same in the presence of myself and Hubert M. Hall

at the time and place herein mentioned; that I have personal knowledge of personal identity of said witness as or had proom made before me of the identity of said witness as; 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 1st day of December, 1945

Evelyn Watts (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Orpheus N. King Jr.

vs. Complainant

Audrey King

Respondent.

Oral Deposition

Filed 12-4, 1945

Wm. A. Leuchs, Register.

Recorded in

Record

Vol. _____ Page _____

, Register.

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons AUDREY KING to appear and plead, answer or demur within thirtydays from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by ORPHEUS N. KING JR., as Complainant and against Audrey King as Respondent.

WITNESS my hand this the 27th day of August, 1951.

Register

ORPHEUS N. KING JR.
COMPLAINANT

VS.

AUDREY KING
RESPONDENT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
IN EQUITY: NO. 2708

TO HONORABLE TELFAIR J. WASHBURN, JR., JUDGE OF THE CIRCUIT COURT OF BALDWIN
COUNTY, ALABAMA, IN EQUITY:

Your Complainant Orpheus W. King Jr., respectfully represents unto your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age, a bona fide resident of Baldwin County, Alabama, and has been all of his life; that the Respondent is over twenty-one years of age, a resident of Baldwin County, Alabama, but presently residing at Rt. 1, Box 255, Woods Frost Utah.

2.

That your Complainant and the Respondent married at Reno Nevada, on November 22, 1947, and lived together as husband and wife until March 19, 1949.

3.

That on March 19, 1949, the Respondent voluntarily abandoned the bed and board of your Complainant, and has remained away voluntarily and continuously since that time.

4.

The Complainant and the Respondent have no children.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Audrey King, party Respondent to this cause

of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant prays that upon a hearing hereof, your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.

(S) H. M. Hall
Solicitor for the Complainant

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Bill of Compliance

STATE OF ALABAMA
BALDWIN COUNTY

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summons AUDREY KING to appear and plead, answer or demur within thirty days from the service hereof, to the Bill of Complaint filed in the Circuit Court of Baldwin County, Alabama, in Equity, by ORPHEUS N. KING JR., as Complainant and against Audrey King as Respondent.

WITNESS my hand this the 27th day of August, 1951.

Alvin J. Leach
Register

ORPHEUS N. KING JR.

COMPLAINANT

VS.

AUDREY KING

RESPONDENT

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

TO HONORABLE TELFAIR J. MASHBURN JR., JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY:

Your Complainant Orpheus N. King Jr., respectfully represents unto
Your Honor and this Honorable Court as follows:

1.

That your Complainant is over twenty-one years of age, a bona fide
residents of Baldwin County, Alabama, and has been all of his life; that
the Respondent is over twenty-one years of age, a resident of Baldwin
County, Alabama, but presently residing at Rt. 1, Box 255, Woods Frost
Utah.

2.

That your Complainant and the Respondent married at Reno Nevada,
on November 22, 1947, and lived together as husband and wife, until
March 19, 1949.

3.


That on March 19, 1949, the Respondent voluntarily abandoned the bed
and board of your Complainant, and has remained away voluntarily and
continuously since that time.

4.

The Complainant and the Respondent have no children.

WHEREFORE, the premises considered, the Complainant prays that your Honor will by proper process make the said Audrey King, party Respondent to this cause of action, requiring her to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

Your Complainant prays that upon a hearing hereof, your Honor will enter an order and decree granting to him an absolute decree of divorce, forever barring the bonds of matrimony existing between him and the Respondent; Complainant prays for such other, further, different or general relief as she may be in equity and good conscience entitled to receive.


Solicitor for the Complainant

no 2708

RECORDED

ORPHEUS N. KING JR.

COMPLAINANT

VS

AUDREY KING

RESPONDENT

BILL OF COMPLAINT

FILED

AUG 27 1951

ALICE J. DUCK, Register

The State of Alabama,
Baldwin County.

No. CIRCUIT COURT, IN EQUITY.

Orpheus N. King Jr.

Complainant

Vs.

Audrey King

Defendant

Motion is hereby made for a Decree Pro Confesso against Audrey King

Defendant

in the above stated cause, on the ground that more than thirty days have elapsed since service of summons upon said Defendant....., and that said summons was duly served by Registered Mail, according to law, and that said Defendant.....ha...s.... failed to demur, plead to or answer the Bill of Complaint in this cause to this date.

This 23 day of Nov, 1951

Solicitor.

No.

Page

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT, IN EQUITY

Orpheus N. King Jr.

Vs.

Audrey King

MOTION FOR DECREE PRO CONFESSO
AFTER NOTICE BY REGISTERED MAIL

Filed 11-26, 1957

Archie R. Duke
Register.

Recorded in Record,

Vol. Page

Register.

7 December 1954

PRM

County Clerk's Office
Bay Minette,
Alabama

Dear Sir:

Enclosed is a check for
\$1.50 (the price quoted to me
several years ago) for a copy
of the Divorce Decree of
Orpheus W. King vs. Audrey
C. King obtained in December
1951.

Self-addressed, stamped
envelope also enclosed.

Sincerely,

841 Dolores St.
San Francisco 10,
Calif.

Mrs. Paul René Tula
(formerly Audrey C. King)

3708
RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1 _____
(Signature or name of addressee)

2 *Earl C. Anderson*
(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery *9-4-* 19 *51*

*Recd. 9-4-51
Earl C. Anderson
Recy*

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300

(GPO)

POSTMARK OF DELIVERING
OFFICE

SEP 1

1951

UTAH

Return to

(NAME OF SENDER)

Street and Number,
or Post Office Box,

REGISTERED ARTICLE

No.

INSURED PARCEL

No.

Post Office Bay Minette, Ala

16-12421

State

RETURN RECEIPT

Received from the Postmaster the Registered or Insured Article, the original number of which appears on the face of this Card.

1

Andrew C. King
Deliver to Addressee Only

(Signature or name of addressee)

2

Deliver to Addressee Only

(Signature of addressee's agent—Agent should enter addressee's name on line ONE above)

Date of delivery

Sept. 28, 19*51*

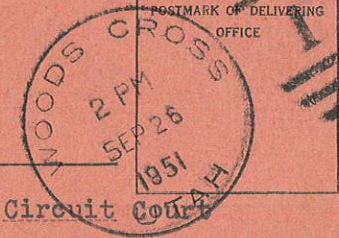
U. S. GOVERNMENT PRINTING OFFICE

16-12421

*Filed 10-1-51
Miss. State*

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, \$300



Return to Alice J. Duck, Clerk of Circuit Court

(NAME OF SENDER)

Street and Number,
or Post Office Box,

P. O. Box 239,

REGISTERED ARTICLE

No. 228

Post Office Bay Minette, Ala.

INSURED PARCEL

No. _____

16-12421

State _____

RECEIPT FOR REGISTERED ARTICLE No.

Fee paid 25

(Date)

190

Class postage paid 1st

Return receipt fee

Special delivery fee

Declared value, \$

Surcharge paid, \$

Restricted delivery
(Accepting employee will place
initials in proper space)

in person

or order

Fee paid 20

From

(Sender)

(Street and number)

(Post office and State)

Addressed to

(Addressee)

(Street and number)

(Post office and State)

Postmaster, per

GPO c9-16-12666-5



Andrew King
Rt 1 Box 255
Woods Cross, Utah



Air mail

VIA AIR MAIL

Alice J. Duck Circuit Clerk
Baldwin County
Day Innette,
Alabama, *etc*

San Francisco, Calif.
September 18, 1951

State of Alabama
Baldwin County

Re: Orpheus D. King, Jr.
vs. Audrey King # 2708

Dear Sir:

Approximately ten days ago I received the above-named summons in the mail. As I have been very ill the past three weeks I haven't had a chance to seek legal advice or to contact your court before this.

It is my wish to obtain an extension of time on the above matter so I can present proof that Mr. King has perjured himself on two separate counts as follows.

1- That I, Audrey King, was never

2- a resident of the state of Alabama or the county of Baldwin, and that Orpheus D. King, Jr. was ever a resident of said state & county during the term of our marriage. The Bureau of Statistics of the state of California, City and County of San Francisco can verify this plus many personal verifications of our residence here.

2- That I, Audrey King left Orpheus D. King, Jr. on March 19, 1949 voluntarily. Mr. King and I lived as man and wife until December, 1950 when Mr. King left at my request for reasons stated in my divorce suit against him and for which I received an interlocutory

3. decree of divorce on May 9, 1951.
To be specific, adultery on the part
of Mr. King. I'm sure my attorney
can obtain a copy of the decree.

If I must be represented
in your court to contest this
second divorce would you
please advise me as I know
no friends or attorneys there.
I know you do not wish to
grant a divorce obtained by
perjury and with an extension
of time I can present sufficient
proof of my statements. Having
worked for attorneys the past
three years I know the penalty
for perjury. Orpheus D. King
Jr. seems to have neither
the morals nor the mental
capacity to appreciate honesty.
Sincerely,
Audrey C. King.

RECEIPT FOR REGISTERED ARTICLE No. 228

Fee paid 25

(Date)

19

Class postage paid

Return receipt fee

Special delivery fee

Declared value, \$

Papers

Surcharge paid, \$

Restricted delivery
(Accepting employee will place initials in proper space)

in person

20

or order

Fee paid

From

Alice J. Duck, Clerk

(Sender)

(Street and number)

(Post office and State)

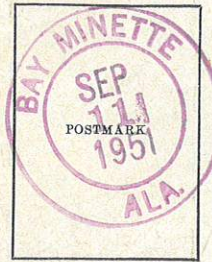
Addressed to

Postmaster, per

(Street and number)

PO 09-16-12660-5

(Post office and State)



Audrey C. King

~~PILLSBURY, MADISON & SUTRO~~

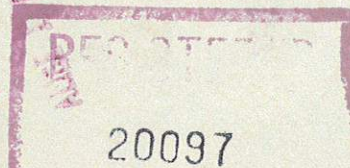
~~STANDARD OIL BUILDING~~

~~SAN FRANCISCO, CALIF.~~

Rt. 1 Box 255
Woods Cross, Utah



FILED
1961
SEP 25
JAN 1961



RETURN RECEIPT REQUESTED

Alice J. Duck, Circuit Clerk
Baldwin County
Bay Minette, Alabama

REGISTERED

