(2708)

DIVORCE DECREE

MOORE PTG. CO.

The State of Alabama, Baldwin County

Circuit Court, In Equity

Orpheus N. King Jr., Complainant

vs.

Audrey King, Respondent

This cause coming on to be heard was submitted upon Bill of Complaint, Decree Pro Confesso on Registered mail 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 Orpheus N. King Jr. is forever divorced from the said Audrey King for and on account of Voluntary 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 the Complainant and Respondent be, and they are hereby permitted to again contract marriage upon the payment of the cost of this suit.

It is further ordered that Orpheus N. King Jr. the Complainant pay the cost herein to be taxed, for which execution may issue.

This 5th day of December, 1951.

Telfair J. Mashburne Jr.
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.

m

No. _____ Page _____

The State of Alabama
BALDWIN COUNTY

In Circuit Court, In Equity

Orpheus M. King Jr.

Complainant

vs.

Audrey King

Respondent

DIVORCE DECREE

FILED
DEC 5 1951

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	)	IN THE CIRCUIT COURT OF
VS	)	BALDWIN COUNTY, ALABAMA,
AUDREY KING	)	IN EQUITY
RESPONDENT	)	

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 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.

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

Certified
2-10-87

8581. NOTE OF TESTIMONY

Printed by The Baldwin Times, Bay Minette.

Orpheus N. King Jr.

vs.

Aubrey 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 as Respondent, and testimony of Orpheus N. King Jr. and Nora King

and in behalf of Defendant upon

Solicitor for Complainant

Register.

m

No. _____

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

Andrew H. King Jr.

vs.

Esther King

NOTE OF TESTIMONY

Filed in Open Court this 4th

day of Dec, 1967

Aerie A. Hirsch
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 MY 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 CALIFORNIA, IN AND FOR THE COUNTY OF SAN FRANCISCO.

BY _____ 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

F. 1293

8602 DECREE PRO CONFESSO AFTER NOTICE BY REGISTERED MAIL B.T.-10-46-200

Orpheus 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, 1951, 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, 1951, 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 Defendant

This the 26 day of November, 1951

Register.

No. _____

CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

In Equity.

Orpheus H. King Jr.

Vs.

Audrey King

DECREE PRO CONFESSO AFTER NOTICE BY REGISTERED MAIL

Filed in office this 26th day of November, 1947

Eric J. Renck, Register

Entered in O. B. _____ Page _____

The Baldwin Times, Bay Minette, Ala.

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.

, Complainant

and Andrey King

Respondent

on oath, to be by you administered, upon Orpheus N. King, Jr., and Nora King

to take and certify the deposition~~s~~ of the witness~~es~~ and return the same to our Court, with all convenient speed, under your hand.

Witness 1st day of Dec, 1967

Register.

Commissioner's Fee, $

Witness' Fees, $

No.

THE STATE OF ALABAMA
Baldwin County

CIRCUIT COURT

Complainant

VS.

Andrew King

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

Evelyn Gibbs

WITNESSES:

Orpheus H. King Jr.

Nora King

ORAL DEPOSITION Printed by the Baldwin Times, Bay Minette, Alabama.

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 es named in the Requirement for Oral Examination, on the 1st day of December 1951, at the office of Hubert M. Hall in Bay Minette, Alabama, and having first sworn said Witness es 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 knowledged that the Complainant and the Respondent have not lived together as husband and wife for more than one year next proceeding 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 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 or had proom 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 1st day of December, 1951.

Evelyn Watts (L. S.)

NO. _____ PAGE _____

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

Orpheus M. King Jr.

vs. Complainant

Audrey King

Respondent.

Oral Deposition

Filed 12-4, 1951

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	)	IN THE CIRCUIT COURT OF
	)	BALDWIN COUNTY, ALABAMA
VS.	)	IN EQUITY: NO. 2708
AUDREY KING RESPONDENT	)	

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 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 continously 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

Bill of complaint

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 ofComplaint 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 21th day of August, 1951.

Register

- -

ORPHEUS N. KING JR.	)	
		IN THE CIRCUIT COURT OF
COMPLAINANT	)	
		BALDWIN COUNTY, ALABAMA,
VS	)	
		IN EQUITY
AUDREY KING	)	
RESPONDENT	)	

TO HONORABLE TILLFAIR 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.

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 M. KING JR.

COMPLAINANT

VS

AUDREY KING

RESPONDENT

BILL OF COMPLAINT

FILED
AUG 27 1951
ALICE J. DOCK, Register

8600 - Motion for Decree Pro Confesso After Service by Registered Mail.

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.....has..... 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

Register.

Recorded in ..... Record,

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

Register.

The Baldwin Times, Bay Minette, Alabama

7 December 1954

PRT

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 N. King vs. Audrey C. King obtained in December 1951.

Self-addressed, stamped envelope also enclosed.

Sincerely,

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

841 Dolores St.
San Francisco 10,
Calif.

2708

Form 3811
Rev. 1-4-40

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

Date of delivery 9-4- _____, 19 51

U. S. GOVERNMENT PRINTING OFFICE 16—12421

Filed 9-4-51
Deputy Clerk
Reg

Post Office Department
OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300
(GPO)

POSTMARK OF DELIVERING OFFICE

WC
SEP 1
1951
UTAH

Return to _____
(NAME OF SENDER)

Street and Number, or Post Office Box, _____

REGISTERED ARTICLE

No. _____

Post Office Bay Minette, Ala

INSURED PARCEL

No. _____

16—12421

State _____

Form 3811
Rev. 1-4-40

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
(Signature or name of addressee)
Deliver to Addressee Only

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, 1951

U. S. GOVERNMENT PRINTING OFFICE 16—12421

Filed 10-4-51
Dist. Court
Clerk

Post Office Department
OFFICIAL BUSINESS

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

POSTMARK OF DELIVERING OFFICE

WOODS CROSS
2 PM
SEP 26
1951
UTAH

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. 190

Fee paid 25 ..... 8/29 ....., 19

(Date)

Class postage paid 1st Letters

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 .....

From Alice J Dunn
(Sender)

Bay Minette Ala
(Street and number) (Post office and State)

Addressed to Lindsay Lang Box 1/203
(Addressee)

Wendover Utah
(Street and number) (Post office and State)

GPO c9—16—12666-5

Postmaster, per ..

POSTMARK
BAY MINETTE ALA
AUG 29 1951

Andrew King
Rt 1 Box 250
Woods Cross, Ut

SAN FRANCISCO, CALIF.
SEP 19
1 - PM
1951

UNITED STATES POSTAGE
3 CENTS 3
UNITED STATES POSTAGE
3 CENTS 3

Airmail

VIA AIR MAIL

Alice J. Quick Circuit Clerk
Baldwin County
Day Bynette,
Alabama.

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 <u>never</u>

2- a resident of the state of Alabama or the county of Baldwin, and that Orpheus N. 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.

3- That I, Audrey King left Orpheus N. 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. 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. Orphens 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

9-11, 19 51
(Date)

Class postage paid /

Declared value, $ Papers

Surcharge paid, $

Return receipt fee 05

Special delivery fee

Restricted delivery
(Accepting employee will place initials in proper space)
in person 20
or order
Fee paid

BAY MINETTE
SEP 11
POSTMARK
1951
ALA.

From Alice J. Duck, Clerk
(Sender)
Bay Minette
(Street and number) (Post office and State)

Addressed to Audrey Perry
(Addressee)
Pl. Bess Marvel Trust Estate
(Street and number) (Post office and State)

PO c9—16—12666-5

Postmaster, per

Audrey C. King
~~PILLSBURY, MADISON & SUTRO~~
~~STANDARD OIL BUILDING~~
~~SAN FRANCISCO 4, CALIF.~~

Rt. 1 Box 255
Woods Cross, Utah

FILED
SEP 25 1951
MARY ROSCH

REGISTERED
20097
RETURN RECEIPT REQUESTED

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

REGISTERED

SAN FRANCISCO, CALIF.
SEP 21 1951
STA. D

FAY MINETTE
SEP 23 1951
ALA.

SAN FRANCISCO, CALIF.
SEP 21 1951
STA. D