The State of Alabama, Baldwin County

Circuit Court, In Equity

	Mary Alice Ard	, Complainant
	vs.	-, Companient
	Samuel Ard Jr.	Danner I. d
mente en arrenne (gregoria en proposition) (proposition) (, Respondent
· · · · · · · · · · · · · · · · · · ·		Bill of Complaint, Decree Pro Confesso of
Answer	and Testimony a	s noted by the Register, and upon con
sideration thereof, the Court is o	f the opinion that the Complains	ant is entitled to the relief prayed for in
It is therefore ordered,	adjudged and decreed by the Co	urt that the bonds of matrimony heretofor
existing between the Complainar	it and Defendant be, and the sar	me are hereby, dissolved, and that the
said Mary Alice Ard		
		is forever divorced from the
said Samiot And In.		for and on account of
Graelty, IT IS FURTH		DECREED, by the Court that
the Complainant be an	of she is hereive superdad	the custody, care and control baron Fller and subject to
the right of the resp	ondent to visit with the	m at reasonable times.
It IS FURTHER OR	DERED, ADJUDGHD AND DECR	EED, by the court, that the
said children, Eldon per month as permanen	wearon and and onaron at	maintenance and support of
Transport and Transport	A Commensionary.	
·		•
It is further ordered, adjud	ged and decreed that neither pa	rty to this suit shall again marry except
to each other until sixty days afte	er the rendition of this decree, an	nd that if appeal is taken within sixty
days, neither party shall again ma	arry except to each other during	the pendency of said appeal.
It is further ordered that the	he Complainant and Respondent	be, and they are hereby permitted to
again contract marriage upon the	payment of the cost of this suit.	, and are never permitted to
It is further ordered that _	Mary Alice Ard	
		700
he	pay the cost herein to be tax	xed, for which execution may issue.
Thisday of		10
		Judge Circuit Court, In Equity.
Ι,		Register of the Circuit
	toregoing is a correct copy of	, Alabama, do hereby certify that the the original decree rendered by the the above stated cause, which said demy office.
	Witness my hand and	seal this theday
	of	, 19
		Register of Circuit Court, In Equity.
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The Sta BALDW	te of IN	Alal COU	oam NŢ	a Y	
In Circuit	Сош	et, In	Equ	ity	
Mary Ali	re A	2013			THE REAL PROPERTY AND THE PARTY AND THE PART
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* :	vs.	Com	olain	ant	
Samuel A	rd J	in e	:		STATES TO SERVICE STATES
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		Res	pond	ent	
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		* *		11	No.

The State of Alabama, Baldwin County

Circuit Court, In Equity

		Complainant
	Samuel Ard Jr.	, Respondent
This cause coming or	o to be heard was submitted upor	Bill of Complaint, December of
en e		en and the state of the state o
sideration thereof, the Court is	and restimony	as noted by the Register, and upon con nant is entitled to the relief prayed for i
said bill.	or the optiment that the Comptan	mant is entitled to the relief prayed for i
It is therefore ordered	l, adjudged and decreed by the C	ourt that the bonds of matrimony heretofor
existing between the Complain	ant and Defendant be, and the s	ame are hereby, dissolved, and that th
said Mary Alloe Ard		
Salu		is forever divorced from th
said Same I am a said		for and an assure
Creelty. IT is fur		for and on account o
	the designation of the contract of the contrac	D DECREED, by the Court that
- 02 the minor objects	400 400 15 Derety awarded 301 11301 Norther Ard and	the custody, care and control Sharon Ellen ird, subject to
the right of the res	spondent to visit with th	em at reasonable time.
It is further (MADERER ATLIBUSED SEED THAT	
AND THE PERSON NAMED AND PARTY OF THE PERSON	MATERIAL PROPERTY AND AND AND AND ADDRESS OF THE PARTY OF	AND THE REAL PROPERTY AND ADDRESS OF THE PARTY
ber mouth as became	l newlon ard and Mharon H	Lien Ard the sum of 350.00
		estable and the state of the st
It is further and and add		
to each other until sixty days af	ter the rendition of this decree	arty to this suit shall again marry except
days, neither party shall again i	marry except to each other durin	and that if appeal is taken within sixty
again contract marriage upon th	the Complainant and Respondent te payment of the cost of this suit	at be, and they are hereby permitted to
	'	: -
It is further ordered that		
the <u>Complainant</u>	pay the cost herein to be to	axed, for which execution may issue.
Inis———day o	of-	
The first section of the first	engaran () and () an	
		Judge Circuit Court, In Equity.
Ι,		Register of the Circuit
	Court of Baldwin County	V. Alabama, do hereby certify that the
	Judge of the Circuit Court i cree is on file end enrolled i	of the original decree rendered by the n the above stated cause, which said den my office.
e de la companya de l	Witness my hand and	l seal this theday
	of	10
		, 19
	, * -	Parist
		Register of Circuit Court, In Equity.

The State of Alabama BALDWIN COUNTY In Circuit Court, In Equity Kary Alice Ard Complainant vs. Samuel Ard Jr. Respondent

DIVORCE DECREE

The State of Alabama, Baldwin County

Circuit Court, In Equity

	Mary Alice Ard		_, Complainant
	vs.		
	Samuel Ard Jr.		
connection graph and the state of the state			_, Respondent
This cause coming on t			int, Decree Pro Confesso he Register, and upon co
leration thereof, the Court is o		117.11 (6.1	,
id bill.			The state of the s
Comment of the Commen	adjudged and decreed by	the Court that the b	onds of matrimony heretofo
isting between the Complainar	· · · · · · · · · · · · · · · · · · ·		
Mary Alice Ard		0., • *** - ***	· , · · · · · · · · · · · · · · · · · ·
d		· · · · · · · · · · · · · · · · · · ·	is forever divorced from t
Samuel Ard Jr.		141.7	
Cruelty. IT IS FURT	HER ORDERED, ADJUD	GED AND DEGREED.	by the Court that
the Complainant be a	. s yê . T	And the second of the second o	
of the minor childre			
the right of the res			
	PRESENT ANTHOUGH A	NTO TERMODERATE A 4-1	ne court, that the
Respondent pay to th			
said children, Eldon			
per month as permane	nt alimony		
	er grand the		p = p - p
WE WIND THE			
	No. in the second		
It is further ordered, adju	idged and decreed that n	either party to this su	it shall again marry exce
each other until sixty days aft	ter the rendition of this o	decree, and that if ap	peal is taken within six
ys, neither party shall again n	narry except to each oth	er during the pendenc	ey of said appeal.
It is further ordered that	the Complainant and Pa	secondant has and the	our our bourship more stand
ain contract marriage upon th	the second secon		ey are hereby permitted
	Mary Alice Ard	this suit.	
It is further ordered that			
Complainant	pay the cost herein	to be taxed, for whi	ch execution may issue
	Tay and and		om encounter may rooms.
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	of		
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Thisday o	Construction of the second of	Juć	, 19 lge Circuit Court, In EquiRegister of the Circ
Thisday o	Court of Baldwir foregoing is a corre Judge of the Circui	Jud a County, Alabama,	, 19
Thisday o	Court of Baldwir foregoing is a corre Judge of the Circui cree is on file end e	Jud a County, Alabama, ect copy of the origin t Court in the above senrolled in my office.	Register of the Circuit do hereby certify that the last decree rendered by the circuit of the circuit.
Thisday o	Court of Baldwin foregoing is a corre Judge of the Circui cree is on file end e	Jud a County, Alabama, bet copy of the origin t Court in the above searrolled in my office. hand and seal this the	Register of the Circuit do hereby certify that to tal decree rendered by to stated cause, which said of
Thisday o	Court of Baldwin foregoing is a corre Judge of the Circui cree is on file end e	Jud a County, Alabama, ect copy of the origin t Court in the above senrolled in my office.	Register of the Circuit do hereby certify that to tal decree rendered by to stated cause, which said of

The State of Alabama BALDWIN COUNTY In Circuit Court, In Equity Complainant vs. Samuel Ard Jr. Respondent DIVORCE DECREE	(学)		-
The State of Alabama BALDWIN COUNTY In Circuit Court, In Equity Pary Alice Ard Complainant vs. Samuel Ard Jr. Respondent DIVORCE DECREE	100		
In Circuit Court, In Equity Lary Alice Ard Complainant vs. Respondent DIVORCE DECREE		TL - C1-1	(Alabama
In Circuit Court, In Equity Lary Alice Ard Complainant vs. Samuel Ard Jr. Respondent DIVORCE DECREE		BALDWIN	COUNTY
Complainant vs. Samuel Ard Jr. Respondent DIVORCE DECREE		In Circuit Co	urt, In Equity
Complainant vs. Samuel Ard Jr. Respondent DIVORCE DECREE		Hary Alie	ee Ard
Samuel Ard Jr. Respondent DIVORCE DECREE			•
Samuel Ard Jr. Respondent DIVORCE DECREE		v	
Respondent DIVORCE DECREE			
Respondent DIVORCE DECREE			
DIVORCE DECREE		. :	Respondent
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THE STATE OF ALABAMA

Circuit Court of Baldwin County, Alabama

witness on amed in the Requirement for Oral Examination, on the log day of August witness of a manage and a m	Baldwin County.	J	(In Equity)	
Samuel Ard Mr. Respondent I, Evelyn Matts as Register(and Commissioner nave called and caused to come before me Nary Alice and and Mrs. Samuan Taylor witness S. named in the Requirement for Oral Examination, on the 10 day of 194 Sl, at the office of Midert M. Mall. "ay Minette Alabama, and having first sworn said Witness St to speak the truth, the whole truth, and nothing but the truth, the said 1947 Alabama. The Respondent Samuel Ard Jr., is over twenty-one years of age and a bona fide resident of Falchin County, Alabama. The Respondent Samuel Ard Jr., is over twenty-one years of age and a resident of Balchin County, Alabama, The Respondent And I married at Fensacola, Florida, on October 9, 1937. We lived together as husbani and wife in Salkhin County, Alabama, until on to-wit, August 21, 1950. That on to-wit, August 22, 1950, and many times prior thereto, the Respondent threatened me and did actual violence tony person by striking me, which necessarily endangered up life and health. I have every reasonable apprehension to believe and the actually believe if the Respondent and Sarron Ellan And age five. These whildren, Eldon Newton Ard age lo and Sarron Ellan And age five. These whildren are now and have been all of theil life with me. I am the suitable, fit and proper person to have their custod care and control. The Respondent and I have made a full and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home and also all the firstures; equipment and stock of goods in the store. I am conveying to the Respondent and I may interest in all the other properties owned by the Respondent or by the Respondent and me jointly. The Respondent and I have also agreed that I am to keep the children subject to the right of the Respondent to visit them at reasonable times and that the Respondent and I pay toward the maintenance and support of the children the sun of \$50.00 per morn between the 25th; and the last of each		Warv Alice and	Completion	* * * * * * * * * * * * * * * * * * * *
Semmel Ard Fr. Respondent I, Evelyn Watts Register, and Commissioner have called and caused to come before me Many Alice and Mrs. Serman Taylor Witness S named in the Requirement for Oral Examination, on the 10 day of August 194 51, at the office of Midder M. Hall Tay Minette Alabama, and having first sworn said Witness S to speak the truth, the whole truth, and nothing but the truth, the said Many Alice Ard and Ts. Herman Taylor doth depose and say as follows: If Name is Many Alice Ard. If an over twenty-one years of age and a bona fide resident of Beldwin County, Alabama. The Respondent Samuel Ard Jr., is over twenty-one years of age and a resident of Deldwin County, Alabama. The Respondent and I married in Fensacola, Florida, on October 9, 1937. We lived together as husband and wife in Beldwin County, Alabama, until on to-wit, August 21, 1950. That on to-wit, August 21, 1950. That on to-wit, August 21, 1950. That on to-wit, August 21, 1950. The Respondent threatened me and did natural violence togy person by striking me, which necessarily endangered my life and health. I have every reasonable approhension to believe and do actually believe if the Respondent and Lawrence to the season which would necessarily endanger my life and health. The Respondent and I have two children, Eldon Newton Ard age lo and Sarron Ellen Ard age five. These whildren are now and have been all of theil life with me. I am the suitable, fit and proper person to have their custod care and control. The Respondent and I have made a full-and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home and also all the fixtures; equipment and stock of goods in the store. I am conveying to the Respondent all my interest in all the other properties owned by the Respondent or by the Respondent and me specific to the right of the Respondent to visit them at reaccomble times and that the Respondent will pay toward the maintenance and support of the children t	,		Comprainan	16
I, Evelyn Watts as Register(and Commissioner nave called and caused to come before me Mary Akics and Mrs. Regnan Taylor witness es named in the Requirement for Oral Examination, on the 10 day of August (194 51, at the office of Mubert E. Wall and a Munatte Alabama, and having first sworm said Witness es to speak the must, the whole truth, and nothing but the truth, the said Mary Alacs Ard and Mrs. Herman Taylor doth depose and say as follows: Alabama. The Respondent of Baldwin County, Alabama. The Respondent Samuel Ard Jr., is over twenty-one years of age and a bona fide resident of Baldwin County, Alabama. The Respondent and I married at Pensacola, Florida, on October 9, 1937. We lived together as husbani and wife in Baldwin County, Alabama, until on to-wit, August 21, 1970, and many times prior thereto, the Respondent threatened me and did actual violence tomy person by striking me, which necessarily endangered my life and health. I have every reasonable apprehension to believe and the actually believe if the Assondent and Lalawa bogoth-encomble varry very the bursons and do further violence to my person which would necessarily indanger my life and health. The Respondent and I have two children, Elden Newton Ard age lo and Sarron Ellen Ard age five. These whildren are now and have been all of theilife with me. I am the suitable, fit and proper person to have their custod care and control. The Respondent and I have made a full and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home and store adjoining the home, depther with all furnishings in the home and also all the furtures, equipment and stock of goods in the store. I am conveying to the Respondent or by the Respondent and me jointly. The Respondent and I have made a full and respondent and me jointly. The Respondent and in the agreed that I am to keep the collider. The Respondent will pay award the maintenance and support of the children the sum of \$50.00 per mount b	and the second of the second o	٧۵.		
Registercand Commissioner nave called and caused to come before me Mary Alice Ard and Mrs. Merman Taylor witness S named in the Requirement for Oral Examination, on the 10 day of August 194 51 at the office of Hubert M. Hall "Albama, and having first sworm said Witness SS to speak the ruth, the whole truth, and nothing but the truth, the said Mary line Ard and Mrs. Herman Taylor doth depose and say as follows: MY Name is Mary Alice Ard. I am over twenty-one years of age and a bona fide resident of Baldwin County, Alabama. The Respondent Samuel Ard Jr., is over twenty-one years of age and a resident of Baldwin County, Alabama. The Respondent and I married at Fensacola, Florida, on October 9, 1937. We lived together as husbani and wife in Baldwin County, Alabama, until no to-wit, August 21, 1950. That on to-wit, August 21, 1950, and many times prior thereto, the Respondent threatened me and did actual violence towy person by striking me, which recessarily endangered to life and health. I have every reasonable apprehension to believe and the actually believe if the Respondent and Lulawategethermore which are arry art its threatenest and to further violence to my person which would necessarily undanger my life and health. The Respondent and I have two children, fladen Hewton Ard age lo and Sarvon Ellen Ard age five. These whildren are now and have been all of theilife with me. I am the suitable, fit and proper person to have their custod care and control. The Respondent and I have made a full and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home, and store adjoining the home, together with all furnishings in the home and also all the fixtures, equipment and stock of goods in the store. I am conveying to the Respondent or by the Respondent and me jointly. The Respondent and I have also agreed that I am to keep the children subject to the right of the Respondent to visit them at reasonable times and that the Respondent will pa	<u> </u>	Samuel Ard Jr.	Respondent	r e e e e e e e e e e e e e e e e e e
witness 98 named in the Requirement for Oral Examination, on the 10 day of August 194 51, at the office of Hubert M. Hall Alabama, and having first sworn said Witness 98 to speak the much, the whole truth, and nothing but the truth, the said Mary Alice Ard and 175. Herman Taylor doth depose and say as follows: MY Name is Namy Alice Ard. I am over twenty-one years of age and a bona fide resident of Baldwin County, Alabama. The Respondent Lamell Ard Jr., is over twenty-one years of age and a resident of Daldwin County, Alabama. The Respondent and I married at Fensacola, Florida, on October 9, 1937. We lived together as husbard and wire in Baldwin County, Alabama, until on to-wit, August 2h, 1950. That on to-wit, August 2h, 1950, and many times prior thereto, the Respondent threatened me and did actual violence tomy person by striking me, which necessarily endangered by Mife and health. I have every reasonable apprehension to believe and the actually believe if the Respondent and I have two children, fileden health. The Respondent and I have two children are now and have been all of theil life with me? I am the suitable, fit and proper person to have their custod care and control. The Respondent and I have made a full and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home and also all the fixtures; equipment and stock of goods in the store. I am conveying to the Respondent all my interest in all the other properties owned by the Respondent all my interest in all the other properties owned by the Respondent or by the Respondent and am 5 differen subject to the right of the Respondent or by the Respondent and sport of the children and that the Respondent will pay toward the maintenance and support of the children the sum of \$50.00 per morns between the 25th and the last of each children the sum of \$50.00 per morns between the 25th and the last of the children the sum of \$50.00 per morns between the 25th and the last of the	The second of th		7 02140110	in the second
witness so named in the Requirement for Oral Examination, on the 10 day of August (194 51, at the office of Mubert M. Hall Alabama, and having first sworn said Witness to speak the muth, the whole truth, and nothing but the truth, the said Mary Alice Ard and Mars. Herman Taylor doth depose and say as follows: 17 Name is Mary Alice Ard. If an over twenty-one years of age and a bona fide resident of Baldwin County, Alabama. The Respondent Samuel Ard Jr., is over twenty-one years of upe and a resident of Baldwin County, Alabama. The Respondent and I married at Fensacola, Florida, on October 9, 1937. We lived together as husband and wife in Baldwin County, Alabama, until on to-wit, August 2h, 1950. That on to-wit, August 2h, 1950, and many times prior thereto, the Respondent threatened me and did netual violence tomy person by striking me, which necessarily endangered at life and health. I have every reasonable apprehension to believe and do actually believe if the Respondent and I have two children, Eldon Mewton Ard age lo and Sarron Ellen Ard age five. These whildren are now and have been all of theilife with me. I am the suitable, lit and proper person to have their custod care and control. The Respondent and I have made a full and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home and store adjoining the home, together with all furnishings in the home and also all the firstures; equipment and stock of goods in the store. I am conveying to the Respondent all my interest in all the other properties owned by the Respondent and man age of the firstures of the children subject to the right of the Respondent to visit them at reasonable times and that the Respondent will pay toward the maintenance and support of the children the sum of \$50.00 per morth between the 25th and the last of each	I,	, , , , , , , , , , , , , , , , , , , ,		· · · · · · · · · · · · · · · · · · ·
witness so named in the Requirement for Oral Examination, on the 10 day of August 194 £1, at the office of hibert M. Hall Tay Minette Alabama, and having first sworm said Witness to speak the ruth, the whole truth, and nothing but the truth, the said Mary Alice Ard and Mrs. Mornan Taylor doth depose and say as follows: Alabama. Alabama. The Respondent and I married at Fensacols, Florida, on Cotober 9, 1937. We lived together as husbant and wife in Baldwin County, Alabama, until on to-wit, August 21, 1950. That on to-wit, August 21, 1950, and many times prior therets, the Respondent threatened me and did actual violence tomy person by striking me, which necessarily endangered by life and health. I have every reasonable apprehension to believe and the actually believe if the Respondent and Laws together actually madanger my life and health. The Respondent and I have two children, Eldon Hewton Ard age to and Sarron Ellen Ard age five. These phildren are now and have been all of theilife with me. I am the suitable, lift and proper person to have their custod care and control. The Respondent and I have made a full-and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home and store adjoining the home, together with all furnishings in the home and also all the fixtures; equipment and stock of goods in the store. T am conveying to the Respondent or by the Aespondent and me jointly. The Respondent and I have also agreed that I am to keep the children subject to the right of the Respondent to visit them at reasonable times and that the Respondent will pay award the maintenance and support of the children the sum of \$50.00 per morth between the 25th, and the last of each	as Register/and Commissioner			
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194 51, at the office of Hubert M. Hall Tay Minette Alabama, and having first sworm said Witness so to speak the fruth, the whole truth, and nothing but the truth, the said Harv Alice Ard and Has. Herman Taylor doth depose and say as follows: NY Name is Mary Alice Ard. If am over twenty—one years of age and a bona fide resident of Baldwin County, Alabama. The Respondent Sammel Ard Jr., is over twenty—one years of age and a resident of Baldwin Sounty, Alabama. The Respondent and I married at Pensacola, Florida, on October 9, 1937. We lived together as husbani and wife in Baldwin Sounty, Alabama, until on to—wit, August 2h, 1950. That on to—wit, August 2h, 1950, and many times prior therete, the Respondent threatened me and did Atual violence tomy person by striking me, which necessarily endangered at life and health. I have every reasonable apprehension to believe and do actually believe if the Respondent and I have two children, Eldon Newton Ard age lo and Sarron Ellen Ard age five. These children are now and have been all of theil life with me. I am the suitable, fit and proper person to have their dustod care and control. The Respondent and I have made a full and complete settlement of our respective property rights whereby the Respondent is conveying to me the real property including the home and store adjoining the home, together with all furnishings in the home and store adjoining the home, together with all furnishings in the home and stock of goods in the store. I am conveying to the Respondent all my interest in all the other properties owned by the Respondent all my interest in all the other properties owned by the Respondent or by the Respondent and me jointly. The Respondent and I have also agreed that I am to keep the children subject to the right of the Respondent to visit them at reasonable times and that the Respondent will pay toward the maintenance and support of the children the sum of \$50.00 per morth between the 25th, and the last of each				
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I am resonally acquainted with the Complainant and the Beaucaderi in this case and have known them for more than five years. I know that they have not lived together as hurband and wife during the past year. I know that the Complainant, Mary Alice Ard is the suitable, fit and proper person to have the care, custody and control of their two minor children.

THE STATE OF ALABAMA
BALDWIN COUNTY

IN CIRCUIT COURT, IN EQUITY.

VS. Complainant

VS. Complainant

Respondent.

Respondent.

Filed Deposition

Filed Recgraff in

Aug. 14

1951

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Register.

MARY ALICE ARD		Ž
Complainant	:	IN THE CIRCUIT COURT OF
⊽s		BALDWIN COUNTY, ALAB AMA
SAMUEL ARD JR.		M EQUITY
Respondent		Q

TO THE HONORABLE TELFAIR J. MASHBURN JR., JUDGE OF SAID COURT:

Comes your Petitioner, Mary Alice Ard, and respectfully represents and shows unto your Honor as follows:

- 1. That she has filed in this Honorable Court a bill seeking alimony for support and maintenance against the Respondent, Samuel Ard, Jr.
- 2. That she is without means of support during the pendency of this suit, and that said Respondent is well able to provide support and maintenance for your Complainant, but that said Respondent has refused and failed so to do.

The premises considered, your Petitioner prays that your Honor will order a reference ore tenus and to ascertain what will be a reasonable amount to be allowed to your Petitioner during the pendency of this suit, to determine a proper attorney fee for your Petitioner's Attorney in this matter, and your Petitioner prays for general relief.

Attorney for Petitioner

MARY ALICE ARD	Ž	
Complainant	X	IN THE CIRCUIT COURT OF
٧s	. Š	PALDWIN COUNTY, ALABAMA
SAMUEL ARD JR.	Ž.	IN EQUITY
Respondent	and the second s	See Expression of the second superscript and t

TO THE REGISTER IN CHANCERY OF SAID COURT:

Upon consideration of the Petition of Mary Alice Ard filed in this cause, the same being duly read, considered and understood by the Court, it is, therefore, the Judgment of this Court, and it is ordered, adjudged and decreed by the Court that the Register of this Court hold a reference according to law, under the rules of this Court, and ascertain and report to this Court what will be a reasonable amount to be allowed to the Complainant, Mary Alice Ard, for her support and maintenance during the pendency of this suit, and that the Register of this Court give notice of holding of said reference according to law.

Done this the Z day of September, 1950.

Jelfoir A. Mallebury, A. Ofronit Judge

THE STATE OF ALABAMA Baldwin County

Circuit Court

TO: Evelyn Watts				
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nd <u>Samuel Ard Jr.</u>				
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No. 25100			
THE STATE OF AL Baldwin Cour	ABA nty	MA	
CIRCUIT CO	UR	T	
Mary, Alice Ard			-
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vs.	Comp	lainan	and the second s
Samuel Ard		:	
	Def	endan	 t
COMMISSION TO TAKE	DEPO	SITIO	N
COMMISSIONE	er:		
Evelyn Watts			
WITNESSES Mary Alice Ar			
Mrs. Herman T	aylor		:

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Printed by The Baldwin Times, Bay Minette.

THE STATE OF ALABAMA Baldwin County

IN EQUITY Circuit Court of Baldwin County

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Herman	Taj	alor:						and a said	Access to make Apparel 1971 a		man, Indian toy
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and in behalf of Defendant upon ____

H.M.HALL

CONTRACTOR OF THE SECOND SECON	Baldwin C		-
Circui	IN EQI it Court of Ba		unty
	Mary Alice Ard		2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
	vs.		
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COMPLAINANT	IN THE CIRCUIT COURT OF
CONSTINCT	BAIDWIN COUNTY, ALABAMA,
VS	Ž
SAMUEL ARD JR.	0 IN EQUITY
RES PONDENT	NO. 2540
PARO FORDER L	X

Now comes the Respondent and for answer to the Complaintant's Bill of Complaint says:

1.

He denies each and every allegation contained therein, not expressly admitted, and demands strict proof of the same.

2.

He admits the allegations contained in paragraphs one and two of the Bill of Company.

3.

He denies all the allegations contained in paragraph three and demands strict proof of the same.

1,

He denies the allegations contained in paragraphs four, five and six, and demands strict proof of the same.

5.

He admits the allegations to paragraph seven as to the two children, but denies that the Complainant is a suitable, fit and proper person to have their care, custody and control.

Solicitor for the Respondent

RECORDED

MARY ALICE ARD

COMPLAINAM

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SAMUEL ARD JR.

RESPONDENT

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NARY ALICE ARD

COMPLAINANT

VS

SAMUEL ARD JR.

RESPONDENT

IN THE CIRCUIT COURT OF
BALLWIN COUNTY, ALAPADA,
IN EQUITY
NO. 2540

enswer, heretofore filed in this cause so that the same shall read as follows:

He denies the allegations contained in paragraphs 4, 5, and 6, however, agrees to pay to the respondent toward the maintenance and support of the two minor children the sum of FINTY (\$50.00) DOLIARS per month.

_

He amends his answer to paregraph seven of the bill of complaint so that the same shall read as follows: He admits the allegations that there was born to the marriage between the Complainant and the Respondent Eldon Newton Ard and Sharon Eller Ard, and that the complainant, the mother of said children, is a suitable, fit and proper person tohave their custody, care and control.

Solicitor for the Respondent

RECORDED

MARY ALICE ARD

COMPLATMANT

. VS

SAMUEL ARD

RESPONDENT

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ALICE 1. DUCK, Register

STATE OF ALABAMA & BALDWIN COUNTY &

You are hereby commanded to summon SAMUEL ARD JR., 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 MARY ALICE ARD, as Complainant, and against SAMUEL ARD JR., as Respondent.

WITNESS my hand this 2 day of September, 1950.

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MARY ALICE	E ARD	7	2000 talk June 1400 talk dash dash dash dash dash dash dash dash	ــ حب سب خ
	Complainant	Š	IN THE CIRCUIT COURT OF	
	Vs	Ž.	BALDWIN COUNTY, ALABAMA	
SAMUEL ARI	JR.	Ž	IN EQUITY	eta eta
	Respondent	ð		

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

Your Complainant, Mary Alice Ard, respectfully shows and represents unto your Honor and this Honorable Court as follows:

l.

That your Complainant is over the age of twenty-one years of age and a bona fide resident of Baldwin County, Alabama; your Respondent is over the age of twenty-one years and a bona fide resident of Baldwin County, Alabama, also.

2.

That your Complainant and the Respondent married in Pensacola, Florida, on October 9, 1937, and lived together as husband and wife in Haldwin County, Alabama until on to-wit, August 24, 1950.

3.

Your Complainant avers and charges that the said Respondent did on or about the 24th day of August, 1950, and many times apprior thereto assault, beat, hit and strike Complainant; that said Respondent has committed actual violence on her person attended with danger to her health or life; Complainant avers and charges that Respondent has made numerous threats of doing her physical harm and from his manner toward her, she is reasonably convinced that he will commit an actual violence upon her person, attended with danger to her life or health.

That your Complainant and Respondent through their common efforts have established a wholesale oil and gas business near Summerdale, in Baldwin County, Alabama. The gross value of which business together with other holdings approximates the sum of Sixty Thousand (\$60,000.00) Dollars to which your Complainant is entitled an undivided one-half interest.

5.

There are also certain bank accounts the deposits in which your Complainant is not informed as to the amounts of these deposits. Your Complainant also is entitled to one-half thereof, because of her joint effort with the Respondent in so earning and accumulating said monies all of which your Complainant is denied access to.

6.

Your Complainant further avers that the said Respondent is a man of considerable income, to-wit; approximately One Thousand (\$1,000.00) Dollars per month being the income from the joint enterprise and effort of your Complainant, who is denied access to her share of said business.

7.

There was born as fruits of this marriage of your Complainant and the Respondent two children; Eldon Newton Ard, age nine, and Sharon Ellen Ard, age four; that said children are with your Complainant who is a suitable, fit, and proper person to have their care, custody and control.

WHEREFORE, the premises considered, your Complainant prays that your Honor will by proper procedure make the said Samuel Ard, Jr., party Respondent to this bill of complaint requiring him 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 further prays that upon final hearing hereof your Honor will grant to her an absolute divorce forever barring the bonds of matrimony existing between your Complainant and Respondent.

Your Complainant further prays that she be awarded the custody, care and control of the minor children, Eldon Newton Ard, age nine, and Sharon Ellen Ard, age four, and that your Honor will grant to the Complainant alimony pendent lite maintenance for herself and for said children in the amount of Five Hundred (\$500.00) Dollars per month and inasmuch as your Complainant is without funds it is suggested that Five Hundred (\$500.00) Dollars be allowed as a reasonable solicitor's fee to your Complainant's Solicitor for his services herein and

and that your Honor will order the Register of this Court to hold a reference and report to this Court what would be a reasonable amount to be allowed your Complainant as alimony for her support and maintenance pending this suit, and what will be a reasonable amount to be allowed your Complainant's Solicitor for his services herein, and that upon a final hearing of this cause, that your Honor will render a decree granting to your Complainant her proper and rightful share of said properties accumulated through her joint effort with the Respondent and further that your Honor will render a decree granting to your Complainant a suitable allowance as maintenance and support for said children and your Complainant prays for such other, further or general relief to which she may be entitled, and your Complainant ever prays, etc.

Solicitor for Complainant

Received In Spare Office

Executed This 7- Sept 1950 By Serving Copy on. Samuel Ard, Jr.

Sheriff Daylor Wilkins By Elleigh Steadham

202540

MARY ALICE ARD

Complainant

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SAMUEL ARD JR.

Respondent

Coot & Source

SUMMONS AND COMPLAINT

ALICE I. DUCK, Register

From the law office of C. LeNoir Thompson Attorney@at-Law

and that your Honor will order the Register of this Court to hold a reference and report to this Court what would be a reasonable amount to be allowed your Complainant as alimony for her support and maintenance pending this suit, and what will be a reasonable amount to be allowed your Complainant's Solicitor for his services herein, and that upon a final hearing of this cause, that your Honor will render a decree granting to your Complainant her proper and rightful share of said properties accumulated through her joint effort with the Respondent and further that your Honor will render a decree granting to your Complainant a suitable allowance as maintenance and support for said children and your Complainant prays for such other, further or general relief to which she may be entitled, and your Complainant ever prays, etc.

Sølicitor for Complainant

Received in State Office this TAYLO PNS, Sheriff

Executed This 7-Sept 1950 By Serving Copy on. Samuel ard, Jer.

Sheriff Taylor Wilburo Edleigh Steadham 202545

MARY ALICE ARD

RECORDED

Complainant

Vs

SAMUEL ARD JR.

Respondent

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SUMMONS AND COMPLAINT

FILED SEP 2 1950

ALICE 1. DUCK, Register

From the law office of C. LeNoir Thompson Attorney@at-Law MARY ALICE ARD Complainant
VS. SAMUEL ARD, JR. Respondent

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA IN EQUITY. NO. 2540

NOTICE

TO: Samuel Ard, Jr.
Respondent in the above styled cause;

You will take notice that on the 2nd day of September, 1950, the Judge of the Circuit Court made a Decree ordering the Register of this Court to hold a reference according to law, to ascertain and report:

1. What will be a reasonable amount to be allowed to the Complainant, Mary Alice Ard, for her support and maintenance during pendency of this suit.

You will further take notice that I have set the 27th day of September, 1950 as the day to hear the said reference, which will be held at my office in the Court House in Bay Minette, Alabama, at 10:00 A. M.

Witness my hand this 14th day of September, 1950.

Register in Equity.

Received in Sherili's Office this day of 195 J

Executed 9-2080 By leave a copy with Somuel Ord Dr. The Holly Statish Establish Delbar Do No. 2540

RECORDED

MARY ALICE ARD, Complainant

VS.

SAMUEL ARD, JR. Respondent

NOTICE

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